

RECORD OF PROCESSING ACTIVITIES

M365 COPILOT CHAT

1. PROCESSING PARTIES

1.1 CONTROLLER NAME

AMLA
Authority for Anti-Money Laundering and Countering
the Financing of Terrorism (AMLA)
MesseTurm | Friedrich-Ebert-Anlage 49
60308 Frankfurt am Main | Germany

RESPONSIBLE UNIT

Executive Director/IT Unit

1.2 DATA PROTECTION OFFICER name

DPO

CONTACT DETAILS

Dpo@amla.europa.eu

1.3 PROCESSOR NAME (IF APPLICABLE)

Microsoft Corporation.

CONTACT DETAILS

<https://aka.ms/privacyresponse>
Microsoft EU Data Protection Officer
One Microsoft Place
South County Business Park
Leopardstown
Dublin 18
D18 P521
Ireland

1.4 JOINT CONTROLLERS NAME (IF APPLICABLE)

CONTACT DETAILS

2. PROCESSING ACTIVITY

2.1 NAME OF THE ACTIVITY

Use of Microsoft Copilot Chat in Work Mode for productivity tasks

2.2 PURPOSE OF THE PROCESSING OF PERSONAL DATA

The purpose of the processing is to support AMLA staff in performing operational tasks such as:

- Translating and rephrasing text
- Drafting emails and letters
- Writing reports and briefing notes
- Summarising long documents
- Preparing meeting minutes and action items
- Performing data analysis and creating visualisations
- Developing or reviewing code (where appropriate)

While the tool is not intended to process personal data, incidental processing may occur through user-generated prompts or references to publicly available personal data. The processing serves AMLA's public interest mandate under Regulation (EU) 2024/1620 and is limited to productivity enhancement.

2.3 OTHER PURPOSES

n/a

2.4 LEGAL BASIS

Choose applicable as per Article 5(1) of Reg. (EU) 2018/1725:

Check
(YES/NO)

Art. 5(1)(a) For the performance of a task carried out in public interest or under AMLA Regulation	X / ☐	The use of Microsoft Copilot is aligned with the strategic and operational objectives of AMLA as defined in Regulation (EU) 2024/1620. While the Regulation does not explicitly mandate the use of artificial intelligence, it provides a clear legal and functional basis for the adoption of innovative digital tools to support AMLA's mission. AMLA's mission involves: - Coordinating national AML/CFT authorities - Ensuring consistent application of EU rules - Managing cross-border supervisory tasks These tasks require high-volume document handling, analysis, and reporting, which AI tools like Copilot can support efficiently, especially when human resources are not yet fully deployed in the starting-up phase of AMLA. This use is not a replacement for human oversight, but a strategic augmentation to meet regulatory deadlines and operational expectations.
Art. 5(1)(b) For complying with a legal obligation upon the Unit/Authority	☐ / ☐	
Art. 5(1)(c) For contractual reasons of the Data Subject	☐ / ☐	
Art. 5(1)(d) The Data Subject has given consent for one (or more) purposes as listed above	☐ / ☐	
Art. 5(1)(e) For protecting the vital interests of the data subject	☐ / ☐	

2.5 NECESSITY OF THE PROCESSING OF PERSONAL DATA

The processing supports staff productivity and efficiency in drafting, summarising, analysing, and coding tasks.

Categories of personal data that may be processed include:

- Names, roles, and other identifiers that users may include in prompts
- Publicly available personal data referenced in documents
- Interaction metadata (e.g. prompt history, Copilot responses)

To comply with the principle of data minimisation, AMLA has implemented organisational measures including user training and internal guidance to prevent the input of personal or sensitive data. Only operational content necessary for productivity tasks is processed, and no personal data is deliberately collected, stored, or analysed

2.6 DATA SUBJECTS

X Staff (TA/CA) X SNEs X Trainees X Outsourced personnel	X Member States/ Competent authorities contacts ☐ Other contacts (please specify) ☐ Other (please specify)
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2.7 CATEGORIES OF PERSONAL DATA

Input and session context Query text (user prompts), which can contain: Names and roles, Dates and locations, Publicly available personal data. Conversation context (previous prompts and responses in the same session) Session identifiers (temporary tokens linking user input to session) Operational/Usage Telemetry¹ Request metadata (timestamp, message length, processing duration) Error handling data (error codes, exception logs) Message routing metrics (latency, queue usage)	Aggregate and Anonymized Analytics Pattern analysis for latency/error improvement (Frequency of summarisation prompts) High-level usage statistics (Number of prompts per user per day , anonymized)
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2.8 DATA RETENTION

<i>Data category</i>	<i>Time limit</i>
Input and session context	Prompts and responses are stored in the user's Copilot interaction history and can be deleted by the user via the Microsoft 365 My Account portal. Session identifiers are ephemeral and discarded after the session ends.
Operational/Usage Telemetry	Retained temporarily during the session for immediate processing and troubleshooting. Not stored beyond session scope and not linked to individual users.
Aggregate and Anonymized Analytics	Retained internally by Microsoft for system optimization. Data is anonymized and not traceable to individual users. Subject to Microsoft's EU Data Boundary commitments ² .

¹ are explicitly excluded from Telemetry: persistent identifiers (e.g. IP address, User ID), behavioral profiling (no tracking across sessions or user profiling).

² [Microsoft EU Data Boundary Overview](#) | [Microsoft Trust Center](#)

3. DISCLOSURE OF PERSONAL DATA - RECIPIENTS WHERE PERSONAL DATA IS DISCLOSED

3.1 INTERNAL UNITS

3.2 MEMBER STATES AUTHORITIES OR THIRD PARTIES (i.e.: private sector) WITHIN THE EU

DG DIGIT, as the system integrator responsible for configuration, security settings, and user management of AMLA's Microsoft 365 environment.

3.3 THIRD COUNTRIES AND/OR INTERNATIONAL ORGANISATIONS

3.4 MEMBER STATES AUTHORITIES OR THIRD PARTIES (i.e.: private sector) WITHIN THE EU

Microsoft Corporation (data processing under EU-compliant safeguards)

4. PRIVACY STATEMENT/ DATA PROTECTION NOTICE

FOR MORE INFORMATION INCLUDING HOW TO EXERCISE YOUR RIGHTS TO ACCESS, RECTIFICATION, OBJECT AND DATA PORTABILITY (WHERE APPLICABLE).

FOR DRAFTING OF THE PRIVACY STATEMENT, PLEASE FOLLOW ART. 15-16 OF THE DPR.

4.1 Please insert a link if available, or the text of the Privacy Statement:

Privacy Statement is available on the Intranet <https://amlaeuropaeu.sharepoint.com/>

4.2 Please explain how you intend to provide the Privacy Statement to the Data Subjects (i.e. via email, teams, Website, etc.):

Via internal documentation, training materials, and intranet

5. DATA SECURITY

5.1 ORGANISATIONAL MEASURES

User training, internal guidance prohibiting input of personal/sensitive data

5.2 TECHNICAL MEASURES

	Check (YES/NO)	Description (if YES)
Pseudonymisation or Encryption	X/□	Microsoft applies encryption at rest and in transit
Measures to ensure:		
– Confidentiality of Data	X/□	Access controls, secure authentication
– Integrity of Data	X/□	Microsoft platform integrity controls

– Availability of Data	X/□	Cloud-based redundancy and uptime guarantees
Resilience of Systems and Services	X/□	Microsoft Azure infrastructure
Restoration of availability and access to Personal Data in a timely manner	X/□	Microsoft disaster recovery protocols
Process for testing, assessing and evaluation of the effectiveness the measures	X/□	Microsoft conducts regular audits and assessments