

Record of Processing Activity

Processing data in the context of AMLA GUEST Microsoft 365 (M365) Portal, including AMLA Extranet

1. Introduction

The Authority for Anti-Money Laundering and Countering the Financing of Terrorism (AMLA) processes your personal data to grant you guest access AMLA GUEST M365 Portal.¹ The AMLA processes your personal data based on Regulation (EU) 2018/1725 (EUDPR).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of AMLA with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

2. Who is the controller?

The Authority for Anti-Money Laundering and Countering the Financing of Terrorism ("AMLA" or the "Agency") is the controller with regard to the data processing activities described in this data protection notice.

For more information on the AMLA, please consult the AMLA website [Homepage - AMLA](#).

3. What personal data do we process, for what purpose and how?

Purpose of the processing operation:

AMLA GUEST M365 Portal is a digital workplace based in M365 environment provided by Microsoft Ireland Operations Limited. It will offer a collaboration platform for AMLA staff, the representatives from European Economic Area (EEA) national authorities and EU institutions and bodies to efficiently perform their tasks within AMLA. By offering secure, remote access, users invited to AMLA GUEST M365 Portal can manage and share information globally. This makes AMLA GUEST M365 Portal particularly beneficial given the diverse organizational backgrounds of its users from across the EEA.

Categories of personal data processed:

1. Identification data:

- Contact details: name, surname, email address.

¹ Those services include Teams, Office 365, Azure AD and per case SharePoint Online.

- Function-related data: organization to which the data subject belongs, city and country of residence, nationality (when the data subject represents a national authority).

Logging into the AMLA GUEST M365 Portal is done with the email address and allows the user to access the AMLA GUEST M365 Portal at any place worldwide.

Contact details are visible to everyone having access to the AMLA GUEST M365 Portal. Function-related data can be easily deducted from the email address.

2. **Content data** is any content uploaded to the AMLA GUEST M365 Portal by users, such as documents (e.g. Word, Excel documents), and multimedia (e.g. video recordings). Such data is stored in Office 365 but not otherwise processed by the service.
3. **Service generated data (SGD)** contains information related to the usage of online services, which are the user IP address, creation time, site URL and user email address. This data is generated by events that are related to user activities in Office 365.

AMLA and Microsoft do NOT process special categories of personal data in the context of A AMLA GUEST M365 Portal. The users are strongly discouraged from sharing any personal information through the platform, for example in documents or messages exchanged between members of a specific group or team. AMLA does not take any responsibility for an inappropriate use of AMLA GUEST M365 Portal.

Description of the processing related to each data category:

The purpose of the AMLA GUEST M365 Portal is to offer a secure digital workplace for authorized participants to manage and exchange information related to their tasks within AMLA. The AMLA GUEST M365 Portal is based in an M365 environment operated by Microsoft as the processor.

The Agency processes personal data to allow participants to access and use collaboration functionality, especially:

- communication and collaboration using Microsoft Teams; collaboration on documents using Microsoft SharePoint Online; and use of integrated Office 365 functionality within these tools.

The operation of the AMLA GUEST M365 Portal requires processing of data categories specified above by AMLA for the following specific purposes:

- Set-up configuration and maintenance of Office 365 capabilities
- Identification,
- Management of the content and SGD
- Administration of the rights allocated to a user account
- End-user support for issues with Office 365
- Prevention, detection and resolution of security events (e.g. cyber-attack)
- Assistance to data subjects in exercising their rights in relation to data processed within Office 365

The operation of the AMLA GUEST M365 Portal requires processing of data categories

specified above by Microsoft for the following specific purposes:

- Providing the Office 365 service to the Commission:
- Identification, content management, SGD
- Technical support to IT teams for issues with Office 365
- Prevention, detection and resolution of security events (e.g. cyber-attack)
- Assistance to data subjects in exercising their rights in relation to data processed within Office 365

4. How long do we keep your data?

The AMLA will keep the personal data for the time necessary to fulfil the purpose of collection or further processing, more in particular:

- Identification data, i.e. guest user email address
 - for as long as the guest user account is active, and
 - 90 days after deletion of the guest user account
- Content data
 - up to 90 days upon deletion of the guest user account
- Service generated data
 - Up to six months after the business purposes for which the data was collected or transferred have been fulfilled

5. Under what legal basis do we process your personal data?

The processing of your personal data by the AMLA is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body.² All personal data connected to the use of AMLA GUEST M365 Portal are processed because they are necessary for the management and functioning of the Agency. More specifically, the objective of all processing activities related to AMLA GUEST M365 Portal is to support the management and the functioning of the Agency, by providing to the representatives of national authorities, other European institutions and bodies the necessary means and tools to perform the tasks related to their involvement in the work of AMLA, as foreseen by Regulation (EU) 2024/1620³. Moreover, using M365 Workplace adjusts the mechanisms and management systems to the new technological environment and advancements and allows the required efficiency.

6. Who can access your personal data?

Access to your personal data is provided to AMLA staff responsible for carrying out this processing operation and to authorised staff according to the “need-to-know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

For services related to the Office 365 cloud-based collaboration platform, Microsoft acts as

² Article 5.1 (a) of the Regulation 2018/1725.

³ Regulation (EU) 2024/1620 of the European Parliament and of the Council of 31 May 2024 establishing the Authority for Anti-Money Laundering and Countering the Financing of Terrorism and amending Regulations (EU) No 1093/2010, (EU) No 1094/2010 and (EU) No 1095/2010.

data processor. Contact details: Microsoft Ireland, South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland.

The information collected will not be given to any third party, except to the extent and for the purpose required by law.

7. Will the processing of your personal data involve any transfer outside of the EU?

Identification data and content data are stored with the EU/EEA and will not leave that territory. If users access the Office 365 service from outside the EU/EEA, personal data may be transferred to a corresponding location in order to provide the service.

For services related to the Office 365 cloud-based collaboration platform, Microsoft acts as data processor. Contact details: Microsoft Ireland, South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland.

Service generated data is not necessarily processed outside of the EU. Microsoft is authorized to transfer it to Microsoft Corp., located in the USA, and the network of sub-processors. This type of data contains information on the usage of the service. The data is aggregated before being transferred but may contain identifiable information. This data transfers are bound by Standard Contractual Clauses (SCC) and a custom Data Processing Agreement (DPA).⁴ Furthermore, Microsoft's privacy notice is accessible [here](#).

8. What are your rights regarding your personal data?

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular, the right of access to your personal data and to relevant information concerning how we use it. You have the right to rectify your personal data in case they are inaccurate or incomplete. Under certain conditions, you have the right to erase your personal data or restrict their use. You have the right to object to our processing of your personal data, on grounds relating to your particular situation, at any time. You have right to data portability.

You can send your request by post in a sealed envelope or via email (see section on contact details below).

9. Contact information

The Data Controller

If you have any comments, questions or concerns regarding the way we process your personal data, or you would like to submit a complaint regarding the collection and use of your personal data, we invite you to contact us on AMLA@amla.europa.eu. Please state in the subject "Data Protection Enquiry".

The postal address of the AMLA is: AMLA, Messeturm, Friedrich-Ebert-Anlage 49, 60308 Frankfurt am Main

⁴ Article 48 of the Regulation 2018/1725.

You can also contact AMLA through the AMLA's website: [Contact us - AMLA](#).

The Data Protection Officer (DPO) of AMLA

You may contact the Data Protection Officer (DPO@amla.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

The European Data Protection Supervisor (EDPS)

You have the right to [lodge a complaint with the European Data Protection Supervisor](#), our supervisory authority for data protection matters.

Where to find more detailed information

You may request the record of the processing operation which will provide you with further details via the following link: [Personal Data Protection Policy - AMLA](#)