

RECORD OF PROCESSING ACTIVITIES

ASSESSMENT OF STAFF SKILLS & EXPERIENCE FOR WORKFORCE DISTRIBUTION

1. PROCESSING PARTIES

1.1 CONTROLLER NAME

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

RESPONSIBLE UNIT

Executive Director – HR
hr@amla.europa.eu

1.2 DATA PROTECTION OFFICER

DPO

CONTACT DETAILS

dpo@amla.europa.eu

1.3 PROCESSOR NAME (IF APPLICABLE)

N/A

CONTACT DETAILS

1.4 JOINT CONTROLLERS NAME (IF APPLICABLE)

N/A

CONTACT DETAILS

2. PROCESSING ACTIVITY

2.1 NAME OF THE ACTIVITY

Assessment of staff skills and experience for workforce distribution.

2.2 PURPOSE OF THE PROCESSING OF PERSONAL DATA

The purpose of this processing activity is to support the AMLA with the allocation of tasks and assignments to the recruited staff members during the development phase of the Authority. The processing of the capabilities, experience and interest of the staff members will allow their possible allocation to tasks and activities within a new organizational structure that could maximize their performance and effectiveness.

The processing activity will take place through an analysis: a) a survey that will collect personal data related to the previous professional experience, knowledge, skills and interests of the data subjects. The survey will be conducted in the EU-survey platform, and b) of interviews conducted with the staff related to the previous professional experience, knowledge, skills and interests of the data subjects for a possible better placement within the organizational structure.

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	<input checked="" type="checkbox"/> / <input type="checkbox"/>	<i>Please name the task:</i> Recital 22 EUI DPR: “Processing of personal data for the performance of tasks carried out in the public interest by the Union institutions and bodies includes the processing of personal data necessary for the management and functioning of those institutions and bodies” which allows the processing based on Article 5 of the AMLA Regulation, together with applicable Executive Board Decision from 2026 on AMLA organizational structure for 2026
Art. 5(1)(b) For complying with a legal obligation upon the Unit/Authority	<input checked="" type="checkbox"/> / <input type="checkbox"/>	<i>Please specify the legal obligation:</i> Article 7 of the EU Staff Regulations and Conditions of Employment for Other Servants for the medical check
Art. 5(1)(c) For contractual reasons of the Data Subject	<input checked="" type="checkbox"/> / <input type="checkbox"/>	Performance of the individual contracts of staff based on their individual Vacancy Notices (mainly AMLA/TA/2025/4 and AMLA/TA/2025/2) but there are some data subjects whose recruitment was based on other Vacancy Notices, or contracts related to the performance of their tasks for the SNEs
Art. 5(1)(d) The Data Subject has given consent for one (or more) purposes as listed above	<input type="checkbox"/> / <input checked="" type="checkbox"/>	<i>Please explain how the consent is gathered:</i> Click or tap here to enter text.
Art. 5(1)(e) For protecting the vital interests of the data subject	<input type="checkbox"/> / <input checked="" type="checkbox"/>	<i>Please specify:</i> Click or tap here to enter text.

2.5 NECESSITY OF THE PROCESSING OF PERSONAL DATA

AMLA has been facing a phase of great expansion in 2025, having to fill in few months an establishment plan of above 100 people. This has been done mainly with two large recruitment procedures for Economist and AML senior officer.

These (and other) procedures have been very useful to support the set-up of the Authority in its start-up phase in 2025. However, in 2026 AMLA is going in a more operational phase, it is designing an entirely new organigramme to respond to the needs of its programming document and there is a need to redistribute the staff in the most efficient way: according to their skills, experience and motivation.

The mapping of those capabilities is required to allocate the recruited to maximize their performance and effectiveness as staff in the new organigramme, this will be done by asking the staff to fill in a self-assessment survey to provide background information that will then be consolidated in a dialogue with the Team leaders. This will provide better information on the availability of skills and experience within AMLA staff and will then be paired with the request mapped in the organigramme to obtain the most meaningful redistribution of resources in the new organisational structure.

2.6 DATA SUBJECTS

- ☒ Staff (TA/CA)
- ☒ SNEs

2.7 CATEGORIES OF PERSONAL DATA

- ☒ Name
- ☒ Surname
- ☒ Communication Data - Email address

	<input checked="" type="checkbox"/> Others - Data related to previous professional experience, knowledge, , skills, job related Interests, notes taken by team leader referring to motivation and demotivation triggers, expectations on work and skills development, motivation level (within a predefined range), motivational factors (within a range), effectiveness in using existing skills to current work demands.
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2.8 DATA RETENTION

Data category	Time limit
Survey, dialogue notes and allocation	2m since the decision to allocate the staff member is taken
AA – personnel file	10y after end of contract

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

3.1 INTERNAL UNITS

(Please list all internal entities to whom the data will be disclosed):

Corresponding Team Leader of the staff member only for the data of the staff member upon which the team leader is responsible for, HR Unit, Executive Director and Executive Board

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

N/A

3.3 THIRD COUNTRIES AND/OR INTERNATIONAL ORGANISATIONS

(If this is the case, please document the additional safeguards in compliance with Art. 48 of the DPR):

N/A

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

N/A

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:

Your personal data is processed by AMLA, who is the Controller, for the purpose of supporting AMLA with the allocation of tasks and assignments to the recruited staff members during the next development phase of the Authority. The processing of the capabilities, experience and interest of the staff members will allow their possible allocation to tasks and activities within a new organizational structure that could maximize their performance and effectiveness. You can contact the Controller at hr@amla.europa.eu

You may contact the Data Protection Officer of AMLA at: dpo@amla.europa.eu regarding issues related to the processing of your personal data.

The legal basis for processing your personal data is the obligation of the Authority under its own regulation to perform the tasks assigned in its Article 5, under the basis of Recital 22 of the EUI Data Protection Regulation, Additionally, the processing is performed under the basis of contractual obligations of the staff members to perform their duties as established in their corresponding Vacancy Notices, and based upon the Executive Board Decision on the AMLA organizational structure for 2026.

Your data will be kept for the duration of 2 months after the decision to allocate the individual staff member is taken. The decision of allocation will be filed in the staff

member's personnel file which is retained for a period of 10 years after the end of the contract.

The recipients of your data will be your corresponding team leader, the HR unit and the executive management (Executive Director and the Executive Board).

You have the right to lodge a complaint with the European Data Protection Supervisor (https://edps.europa.eu/data-protection/our-role-supervisor/complaints/edps-complaint-form_en) if you consider that your data protection rights have been infringed.

Your data will not be transferred to third countries or international organizations nor it will not be used for an automated decision-making including profiling.

You have the right to:

- Access your personal data under the conditions of Article 17 of Regulation (EU) 2018/1725
- Rectify your personal data under the conditions of Article 18 of Regulation (EU) 2018/1725,
- Erase your personal data under Article 19 of Regulation (EU) 2018/1725, when applicable,
- Restrict the processing concerning yourself under Article 20 of Regulation (EU) 2018/1725, when applicable or
- Exercise your right to object under Article 23 of Regulation (EU) 2018/1725.

If you would like to exercise any of these rights, contact the controller or the DPO.

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

For the survey, the PS will be inserted before the start of the Survey

For the dialogue with the team Leader, the Team leader will inform the Staff member about their privacy rights prior to the start of the dialogue.

5. DATA SECURITY

5.1 ORGANISATIONAL MEASURES

EU Survey stores the EU Login username as well as e-mail addresses of the survey owners at the Data Centre of the European Commission.

The European Commission has implemented security measures to protect server hardware, software and the network from accidental or malicious manipulations and loss of data. All data is stored on European Commission servers managed by DG DIGIT in line with the technical security provisions laid down in the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission, its subsequent versions, its implementing rules (as adapted from time to time) and the corresponding security standards and guidelines, as well as the Commission Decision (EU, Euratom) 2015/443 of 13 March 2015 on the security in the Commission, its implementing rules and the corresponding security notices. These documents (as adapted from time to time) are available for consultation at the following address: https://ec.europa.eu/info/publications/security-standards-applying-all-european-commission-information-systems_en

The Team Leaders shall collect their notes and provide them to a dedicated folder under the HR responsibility. The folder will have access rights restricted to HR staff and individual Team Leaders. A consolidated report is to be provided to executive management.

5.2 TECHNICAL MEASURES

	Check (YES/NO)	Description (if YES)
Pseudonymisation or Encryption	<input checked="" type="checkbox"/> / <input type="checkbox"/>	Both EU Survey and SharePoint are encrypted

Measures to ensure:		
– Confidentiality of Data	<input checked="" type="checkbox"/> /□	Click or tap here to enter text.
– Integrity of Data	<input checked="" type="checkbox"/> /□	Click or tap here to enter text.
– Availability of Data	<input checked="" type="checkbox"/> /□	Click or tap here to enter text.
Resilience of Systems and Services	<input type="checkbox"/> /☒	Click or tap here to enter text.
Restoration of availability and access to Personal Data in a timely manner	<input type="checkbox"/> /☒	Click or tap here to enter text.
Process for testing, assessing and evaluation of the effectiveness the measures	<input type="checkbox"/> /☒	Click or tap here to enter text.