# EDPB Personal data records of processing activities – proposed structure (article 31 of the Regulation 2018/1725[1])

Record of EDPB activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

| Nr. | Item | Description |
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| 1. | **Title of the processing operation** | EDPB and AMLA joint stakeholders event with technology providers on the joint AMLA - EDPB Guidelines on Partnerships for information sharing under Article 75 AMLR and their data protection implications |
| 2. | **Number of record** | EDPB-19 |
| 3. | **Last updated** | October 2026 |
| 4. | **Data controller** | European Data Protection Board<br>Edpb@edpb.europa.eu<br>Rue Montoyer, 30<br>Belgium, Brussels |
| 5. | **Joint controllers** | The Authority for Anti-Money Laundering and Countering the Financing of Terrorism (AMLA) |
| 6. | **Processor(s)** | • European Parliament for the provision of technical services, and<br>• CISCO acting as a processor of AMLA for the hosting of virtual events. |

[1] Regulation 2018/1725 on the protection of natural persons with regard to the processing of personal data by the EU institutions, bodies, offices and agencies.

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| 7. | **Data Protection Officer (DPO)** | EDPB Data Protection Officer<br>Edpb-dpo@edpb.europa.eu<br>Rue Montoyer, 30<br>Belgium, Brussels |
| 8. | **Description of the processing operation** | The Joint controllers process personal data to organise an online stakeholders event with technology providers on the joint AMLA-EDPB Guidelines on Partnerships for information sharing under Article 75 AMLR and their data protection implications in view of gathering input from interested technology providers for the elaboration of those guidelines. The selection of the technology providers to be invited to the event, which can only accommodate a limited number of participants, might lead to complaints by some providers who could not participate. Should it be the case, the organisation of the event includes the handling of such complaints. |
| 9. | **Purpose of processing operation** | The purpose of this online stakeholders event is to obtain views, information and expertise of technology providers, who will participate in the event, for the elaboration of the joint AMLA-EDPB Guidelines on Partnerships for information sharing under Article 75 AMLR and their data protection implications. |
| 10. | **Legal basis** | For the organisation, management and running of the event the EDPB processes personal data 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 under Article 5(1)(a) and (2) of Regulation (EU) 2018/1725[2] combined with Article 70(1) point (e) GDPR and Article 70(4) GDPR.<br><br>The EDPB relies on Article 10(2)(e) of Regulation (EU) 2018/1725 for the processing of any special categories of personal data[3] which participants might include when taking the floor in the event or in the |

[2] Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (Text with EEA relevance.).

[3] That is "personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. See Article 10(1) of Regulation (EU) 2018/1725.

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| | | chat function of the conference tool. When participants include such categories of personal data in written exchanges with the Joint Controllers, the EDPB relies on Article 10(2)(g) of Regulation (EU) 2018/1725.<br><br>Where the EDPB is required to process personal data to comply with a legal obligation (e.g. when a relevant EU body such as the European Court of Auditors carries out an audit or investigation, or for the purposes of requests for access to documents in accordance with Regulation (EC) 1049/2001[4]), the lawfulness of such processing rests on Article 5(1)(b) and (2) of Regulation (EU) 2018/1725. For the processing of any special categories of personal data, participants might refer to when taking the floor in the event or in the chat function of the conference tool or in written exchanges with the Joint Controllers, depending on the purpose, Article 10(2)(f) and (g) Regulation (EU) 2018/1725 may apply. |
| 11. | **Description of categories of data subjects** | Participants and potential participants to the stakeholders event. |
| 12. | **Description of processed personal data / categories** | (a) name and surname;<br>(b) business email address;<br>(c) name of the company the applicant represents;<br>(d) a short description of the company's business activities (maximum 500 words);<br>(e) a description of relevant active experience in the field of information-sharing platforms or arrangements;<br>(f) the EU/EEA member states in which the applicant to the event is providing services;<br>(g) any unredacted personal data contained in any files that applicants may choose to upload as part of an option to add support for their responses in the EU Survey;<br>(h) any personal data required by the service provider to ensure participation in the online event; and<br>(i) any personal data included in any views expressed during the event or any comments that participants to the event may type in the chat function of the conferencing tool. |

[4] Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents, OJ L 145, 31.5.2001, p. 43–48.

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| | | Participants can also use their device's camera and microphone to transmit personal data which will then be processed as part of their participation in the stakeholders event. These participants have the option to mute their microphone, if they do not wish to be heard and to deactivate their cameras, if they do not wish to be seen.<br><br>The Joint Controllers do not require the processing of any confidential information or special categories of personal data. For this reason, participants and speakers are not required or expected to include such information or data in views, substantive contributions and/or expertise expressed in connection to the stakeholders event – including those expressed orally during the event, those shared in writing through the chat function of the conferencing tool, or those otherwise shared by writing.<br><br>The Joint Controllers will take notes of the input and views expressed during the event with a view to taking such input into account while drafting the guidelines on Article 75 AMLAR.<br><br>The Joint Controllers will also create a report on the input from participants to the stakeholders event. The report will be written in a general form which does not allow for the identification of individual contributors or organisations, with input being aggregated where appropriate. The report will become public. |
| 13. | **Description of procedure to ensure data subjects' rights** | A specific privacy statement containing details on how data subjects can exercise their rights is made available on the EDPB and AMLA websites as well as via the EU Survey questionnaire. |
| 14. | **Description of recipients of personal data** | • AMLA acting as a joint controller.<br>• The European Commission:<br>  ○ acting as a processor of AMLA in relation to EU Survey; and/or<br>  ○ acting as a separate controller for any processing it carries out for its own purposes in relation |

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| | | to EU Survey[5] and EU Login[6];<br>• The European Parliament acting as a processor of the EDPB for the provision of technical services to the EDPB;<br>• CISCO acting as a processor of AMLA for the hosting of virtual events;<br>• The names of the participants joining online (as entered by the participants themselves) are made available to each participant for the duration of this online event;<br>• Members of the public in the context of requests for access to documents, in accordance with the provisions of Regulation (EC) 1049/2001 or Council Regulation (EEC, Euratom) 354/83[7]. |
| 15. | **Description of transfers** | AMLA will transfer personal data to the US company CISCO, which is AMLA's processor for the purposes of offering teleconferencing services. CISCO Systems Inc. has adhered to the EU-US Data Privacy Framework, in line with Article 47 of Regulation (EU) 2018/1725. |
| 16. | **Description of envisaged time limits for retention for each processing operation** | Personal data processed for the purposes of the stakeholders event are kept for 5 years[8].<br><br>Personal data may be part of documents with historical or administrative value, which are selected for preservation in the EDPB records. In this case, the personal data they contain will be kept indefinitely and – unless an exemption applies – be made public in accordance with Regulation (EEC, EURATOM) 354/83 on the opening to the public of historical archives after 30 years. |
| 17. | **General description of technical and organisational** | <u>IT Measures</u><br><br>Any personal data collected by the EDPB is kept in restricted access servers, available only to authorised staff through adequate IT security measures. In general, technical measures include appropriate actions |

[5] For more information on the processing of personal data by EU Survey of the European Commission you may read https://ec.europa.eu/eusurvey/home/dpa and https://ec.europa.eu/eusurvey/home/privacystatement

[6] For more information, please consult the relevant record of the European Commission, DPR-EC-03187.1, available at https://ec.europa.eu/dpo-register/detail/DPR-EC-03187.

[7] Council Regulation (EEC, Euratom) No 354/83 of 1 February 1983 concerning the opening to the public of the historical archives of the European Economic Community and the European Atomic Energy Community.

[8] An exception is made to contact details on the EDPB Single Contact List, which are kept for as long as data subjects wish to be part of said list or until the EDPB is requested its removal for any additional reasons (e.g. change of contact point).

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| | **security measures referred to in Article 33** | to systems from accidental or malicious manipulations and risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed.<br><br><u>Organisational measures</u><br><br>Appropriate organisational measures have been taken to protect the systems. Physical access to the EDPB premises is restricted to authorised staff and EDPB members. |