

Record of processing activity

M365 Copilot



1. General Information

Reference number	J033
Last update:	14/02/2025
Joint controllers:	EESC and CoR
Joint controllership arrangement	EESC-Cor JCA
Directorate/unit:	IIT3 DIP
Contact details:	m365-programme@cor.europa.eu
DPO - contact details	EESC Data Protection; data.protection@cor.europa.eu
Processor(s)	Microsoft
Data Processing Agreement	N/A

2. Purpose and description of the personal data processing

Purpose(s) of the personal data processing

Microsoft 365 Copilot is an Al-powered productivity tool designed to create, summarise, and analyse user's documents, messages, and data. It can also generate drafts, analyse spreadsheet data and create presentations using natural language request.

It provides real-time intelligence that enables users to complete tasks more efficiently, enhance their productivity & skills, and improve their overall work experience. From a business impact perspective, users get content relevant to their work tasks, like drafting, summarizing, and answering questions; all in the context of their work within their Microsoft 365 app.

The Directorate for Innovation and Information Technology of

	the Joint Services of the European Committee of the Regions and the European Social and Economic Committee aims to provide staff access to M365 Copilot to support their daily tasks.
Categories of persons whose personal data are processed	Everyone, including staff and members, whose personal data are stored on folders to which participants in the pilot have access, and where participants have chosen not to flag those folders as sensitive. It is important to note that, as far as processing of data, including personal data, is concerned, Copilot will not go beyond the access rights and privileges that users currently already have.
Categories of personal data processed	M365 Copilot has access to data in files and folders, but not to data in systems such as e.g. Sysper, Mima or EVA.
	It is possible that some personal data are included but processing personal data is not as such the aim of the project.
	In principle, no special categories of data, other than those used by CoR Dir E, being one of their shared drives that could contain personal data, will be in scope of Copilot.
Recipients of the personal data	No-one except the data subjects will have access to their personal data.
Transfers of personal data to a third country or an international organization	N/A
Retention period of the personal data	Appropriate retention policies will be defined in consultation with the user community, as one of the outcomes of the pilot phase.
	Currently we have only 1 retention policy in place which ensures that individual, group and meeting chats are preserved for period of 2 years, and then deleted.
General description of security measures, where possible	The IT security policies of the Committees apply.
Data Protection Notice	Data Protection Notice available internally