Subject: Your application for access to documents – EASE 2024/3709

Dear Ms Verheecke,

We refer to your request registered on 11 July 2024 under the above-mentioned reference number.

You requested the access to the correspondence, attendance lists, agendas, background papers, transcripts and recordings and the meeting minutes/notes relating to the meeting between Sandra Bartelt, Suvi Leinonen and Fleishman-Hillard on Global Gateway on 29th April 2024.

Your application concerns the following documents:

- Ares(2024)2938323 - meeting request (SB): Global Gateway for Critical Raw Materials Development, Brussels, 29/04/2024 or 30/04/2024
- Ares(2024)5118826 - Debrief: meeting with Fleishman & Hillard, 29/04/2024

Protection of the privacy and the integrity of the individual:

A complete disclosure of document in annex is prevented by the exception concerning the protection of privacy and the integrity of the individual outlined in Article 4(1)(b) of Regulation (EC) No 1049/2001 because they contain the following personal data:

- the names/initials and contact information of Commission staff members not pertaining to the senior management;
- the names/initials and contact details of other natural persons;

Article 9(1)(b) of the Data Protection Regulation does not allow the transmission of these personal data, except if you prove that it is necessary to have the data transmitted to...
you for a specific purpose in the public interest and where there is no reason to assume that the legitimate interests of the data subject might be prejudiced.

In your request, you do not express any particular interest to have access to these personal data nor do you put forward any arguments to establish the necessity to have the data transmitted for a specific purpose in the public interest.

Consequently, I conclude that, pursuant to Article 4(1)(b) of Regulation (EC) No 1049/2001, access cannot be granted to the personal data contained in the requested documents, as the need to obtain access there to for a purpose in the public interest has not been substantiated and there is no reason to think that the legitimate interests of the individuals concerned would not be prejudiced by disclosure of the personal data concerned.

**Disclaimers:**

You may reuse public documents, which have been produced by the European Commission or by public and private entities on its behalf based on the Commission Decision on the reuse of Commission documents. You may reuse the documents disclosed free of charge and for non-commercial and commercial purposes provided that the source is acknowledged and that you do not distort the original meaning or message of the documents. Please note that the Commission does not assume liability stemming from the reuse.

In accordance with Article 7(2) of Regulation (EC) No 1049/2001, you are entitled to make a confirmatory application requesting the Commission to review this position.

Such a confirmatory application should be addressed within 15 working days upon receipt of this letter to the Secretary-General of the Commission at the following address:

European Commission  
Secretariat-General  
Transparency, Document Management & Access to Documents (SG.C.1)  
BERL 7/076  
B-1049 Brussels  
or by email to: sg-acc-doc@ec.europa.eu

Yours sincerely,

Electronically signed

Koen DOENS

Enclosures:

- Annex 1 Ares(2024)2938323 - meeting request (SB): Global Gateway for Critical Raw Materials Development, Brussels, 29/04/2024 or 30/04/2024  
- Annex 2 Ares(2024)5118826 - Debrief: meeting with Fleishman & Hillard, 29/04/2024