



EUROPEAN COMMISSION  
SECRETARIAT-GENERAL

Directorate D - Jobs, Growth & Investment  
The Director

Brussels,  
SG.D.2/JS

Rebecca Vaughan  
40 Bermondsey Street  
London

*Advance copy by email: ask+request-7846-  
faea2977@asktheeu*

Dear Madam,

**Subject: Your application for access to documents – GESTDEM 2020/2028**

We refer to your e-mail of 9 April 2020 in which you make a request for access to documents, registered on 21 January, 12 and 19 February 2020 under the above mentioned reference number.

You request access to all documentation (including but not limited to all email correspondence, attendance lists, agendas, background papers, and minutes/notes) relating to the meetings listed below:

- between President von der Leyen and AXA on 21 January 2020;
- between Valeria Miceli and Deutsche Bank AG (DB) on 19 February 2020;
- between Valeria Miceli and Insurance Europe on 12 February 2020.

Your application concerns the following documents:

Author <sup>1</sup>	Addressee	Date	Title	ARES reference
Axa	President von der Leyen	Wednesday 18 December 2019	Ares(2019)7874610 email	Ares(2019)7874610
Axa	President von der Leyen	Thursday 3 October 2019	Ares(2019)7874610 reminder	Ares(2019)7874610
Cabinet von der Leyen	Axa	Sunday 5 January 2020	Ares(2020)40419 Reply to request for a meeting with President von der Leyen in Davos	Ares(2020)40419
Deutsche Bank	Cabinet von der Leyen	February 2020	Ares(2020)2355962 Basel III Implementation issues Feb 2020 final	Ares(2020)2355962
Deutsche Bank	Cabinet von der Leyen	Friday 28 February 2020	Ares(2020)2355962 Follow-up email	Ares(2020)2355962
Deutsche Bank	Cabinet von der Leyen	Thursday 6 February 2020	Ares(2020)2355962 Meeting request and confirmation	Ares(2020)2355962
Cabinet von der Leyen	Insurance Europe	Friday 1 May 2020	Ares(2020)2358454 - e-Pass	Ares(2020)2358454
Insurance Europe	Cabinet von der Leyen	Tuesday 7 January 2020	Ares(2020)2358454 - follow-up email 2	Ares(2020)2358454
Insurance Europe	Cabinet von der Leyen	Tuesday 7 January 2020	Ares(2020)2358454 - meeting request and confirmation	Ares(2020)2358454
Insurance Europe	Cabinet von der Leyen	Wednesday 12 February 2020	Ares(2020)2358454 - summary	Ares(2020)2358454
Insurance Europe	Cabinet von der Leyen	Thursday 13 February	Ares(2020)2358454 Follow-up email 1	Ares(2020)2358454

With regard to all the documents listed above, a complete disclosure of the identified documents 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;

<sup>1</sup> For email chains, this table refers to the first email of the chain.

- the names/initials and contact details of other natural persons;
- handwritten signatures/abbreviated signatures of natural persons.

Moreover, since document “Ares(2020)2355962 Basel III Implementation issues Feb 2020 final” comes from a third party, the originator of the document has been consulted.

Following an examination of document “Ares(2020)2355962 Basel III Implementation issues Feb 2020 final” under the provisions of Regulation (EC) No 1049/2001 regarding public access to documents and taking into account the opinion of the third party, I regret to inform you that your application cannot be granted, as disclosure is prevented by exception to the right of access laid down in Article 4 and first indent of Article 4(2) of this Regulation.

The document which you seek to obtain contains commercially sensitive business information of the company that submitted it. The authors of the document have objected to the disclosure of the document that they sent to the Commission and have motivated their position by explaining that its disclosure would impact negatively their intellectual property, as defined under Article 4(2) of the Regulation. We have considered whether partial access could be granted to the document requested but it is entirely covered by the exception under Article 4(2) of the Regulation.

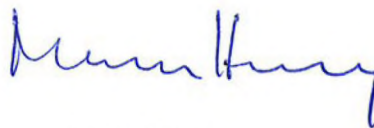
The exceptions laid down in Article 4(2) and 4(3) of Regulation (EC) No 1049/2001 apply unless there is an overriding public interest in disclosure of the document. We have examined whether there could be an overriding public interest in disclosure, but have not been able to identify such an interest.

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 Bruxelles  
or by email to: [sg-acc-doc@ec.europa.eu](mailto:sg-acc-doc@ec.europa.eu)

Yours faithfully,



Marcel Haag