



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR FINANCIAL STABILITY, FINANCIAL SERVICES AND CAPITAL
MARKETS UNION

Sustainable Finance
Head of Unit

Brussels,
FISMA B2 AG/eg/2021/5868214

Ms Paula Castro
40 Bermondsey street
London
United Kingdom

Response per e-mail
ask+request-9397-
a2e87f18@asktheeu.org

Subject: Your request for access to documents (our ref. GESTDEM: 2021/2797)

Dear Ms Castro,

Thank you very much for your e-mail dated 30 April 2021, in which you make a request for access to documents, registered under the above mentioned reference number.

Your request is as follows:

“Under the right of access to documents in the EU treaties, as developed in Regulation 1049/2001, I am requesting documents which contain the following information:

All documentation, including but not limited to attendance lists, agendas, background papers, minutes/notes and email correspondence about or summarising, the following meetings of Cabinet members of Commissioner Mairead McGuinness with organisations:

- 1. Meeting with Association for Financial Markets in Europe (AFME) on 27/04/2021 regarding "Sustainable Finance"*
- 2. Meeting with EuropeanIssuers (EuropeanIssuers) on 20/04/2021 regarding "Financial sustainable - Taxonomy."*

As regards your request concerning meetings and written communications for cabinet members of Commissioner Mairead McGuinness, all relevant documents have been added to your request. After a search, we could identify 4 documents, which are enclosed with a list of documents.

Having examined the documents requested under the provisions of Regulation (EC) No 1049/2001 regarding public access to documents, I have come to the conclusion that they may be only partially disclosed as they contain personal data, in particular names and contact details.

Personal data can only be transmitted under specific exceptional conditions, including if *'the recipient establishes that it is necessary to have the data transmitted for a specific purpose in the public interest'*. According to Article 9(1)(b) of Regulation 2018/1725, the European Commission also only has to examine the further conditions for a lawful processing of personal data if the recipient has established that it is necessary to have the data transmitted for a specific purpose in the public interest. In your request, you do not put forward any arguments to establish the necessity to have the data transmitted for a specific purpose in the public interest.

Notwithstanding the above, please note that there are reasons to assume that the legitimate interests of the data subjects concerned would be prejudiced by disclosure of the personal data reflected in the documents.

Consequently, I conclude that, pursuant to Article 4(1)(b) of Regulation 1049/2001, access cannot be granted to the personal data, as the need to obtain access thereto 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.

Should you disagree with the assessment that the redacted data are personal data which can only be disclosed if such disclosure is legitimate under the applicable rules on the protection of personal data, you are entitled, in accordance with Article 7(2) of Regulation 1049/2001, to submit 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 Secretariat-General of the Commission at the following address:

European Commission
Secretariat-General
Unit C.1. 'Transparency, Document Management and Access to Documents'
BERL 7/076
B-1049 Bruxelles, or by email to: sg-acc-doc@ec.europa.eu

Yours sincerely,

[e-signed]

Martin Spolc

Enclosures: List of documents and 4 documents redacted