



EUROPEAN COMMISSION
SECRETARIAT-GENERAL

Directorate E – Citizens, Health, Migration & Security Union
The Director

Brussels
SG.E.4./om

Ms Lora Verheecke
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Subject: Your application for access to documents – GESTDEM 2022/0176

Dear Madam,

We refer to your email of 10 January 2022 in which you make a request for access to documents, registered on 11 January 2022 under the above reference number.

You request access to all documents - including but not limited to correspondence (including email and letters) containing substantive discussion relevant to the meeting topic, attendance lists, agendas, background papers, transcripts, recordings, minutes, notes, and meeting conclusions - relating to the meeting between Anthony Whelan and Association Internationale de la Mutualité (AIM) on 17 September 2021.

Your application concerns the following documents:

1. The meeting request sent on 25 June 2021 by Ms Corinna Hartrampf, Senior Project Manager at AIM, with the attachment to the meeting request (AIM position paper on 'Improvement of healthcare through exchange of health data - but how?') (Ares(2021)4169360).
2. The email on the proposed time for the meeting sent on 6 July 2021 by Anthony Whelan's assistant (Ares(2021)4383415).
3. The short notes of the meeting, drafted by Anthony Whelan (Ares(2022)236732).

With regard to documents 1, 2 and 3 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.

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 is not granted to the personal data contained in the requested documents, as the need to obtain access to that data 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.

With regard to document 1, please note that documents originating from third parties are disclosed to you based on Regulation (EC) No 1049/2001. However, this disclosure is without prejudice to the rules on intellectual property, which may limit your right to reproduce or exploit the released documents without the agreement of the originator, who may hold an intellectual property right on them. The European Commission does not assume any responsibility from their reuse.

Regarding document 3, this document was drawn up for internal use under the responsibility of the relevant official of the Cabinet of the President. It solely reflects the author's interpretation of the interventions made and does not set out any official position of the third parties to which the document refers, who were not consulted on its content. It does not reflect the position of the Commission and cannot be quoted as such.

In case you were to disagree with this position, you are entitled, in accordance with Article 7(2) of Regulation (EC) No 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 Brussels, or by email to: sg-acc-doc@ec.europa.eu

Yours faithfully,

(e-signed)
William Sleath