



## EUROPEAN COMMISSION

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

Horizontal policies  
**Digital Finance**

Brussels  
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Dear Ms Menhard

**Subject: Your application for access to documents – GESTDEM 2022/3555, 2022/3556 & 2022/3590**

We refer to your e-mails of 21 and 22 June 2022 in which you make the requests for access to documents, registered on 21 and 22 June 2022 under the above-mentioned reference numbers.

You request access to:

**Gestdem 2022/3555:** *“All documents—including but not limited to correspondence, emails, minutes, notes (hand written or electronic), audio or video recordings, verbatim reports, operational conclusions, lines to take, briefings, and presentations—related to the contribution of Decentralised Finance Group to the consultation on Financial services – EU regulatory framework for crypto-assets from 19-12-2019 - 19-03-2020”.*

**Gestdem 2022/3556:** *“All documents—including but not limited to correspondence, emails, minutes, notes (hand written or electronic), audio or video recordings, verbatim reports, operational conclusions, lines to take, briefings, and presentations—related to the contribution of Blockchain for Europe to the consultation on Financial services – EU regulatory framework for crypto-assets from 19-12-2019 to 19-03-2020”.*

**Gestdem 2022/3590:** *“All documents—including but not limited to correspondence, emails, minutes, notes (hand written or electronic), audio or video recordings, verbatim reports, operational conclusions, lines to take, briefings, and presentations—related to the contribution of Association pour le développement des actifs numériques to the consultation on Financial services – EU regulatory framework for crypto-assets from 19-12-2019 - 19-03-2020”.*

Your application concerns the following documents:

- Contribution of *Decentralised Finance Group* to the public consultation “An EU framework for markets in crypto-assets”
- Contribution of *Blockchain for Europe* to the public consultation “An EU framework for markets in crypto-assets”
- Contribution of *Association pour le développement des actifs numériques* to the public consultation “An EU framework for markets in crypto-assets”

With regard to the three 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 details of 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 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.

***Disclaimer***

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.

In case you would 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](mailto:sg-acc-doc@ec.europa.eu)

Yours faithfully,

Electronically signed

Jan CEYSSENS  
Head of Unit