



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MIGRATION AND HOME AFFAIRS

Directorate D – Internal Security  
D.4 – Security in the Digital Age

Brussels  
HOME.D.4/AP

Ms Nienke Palstra.  
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**Subject: Your application for access to documents – GESTDEM 2022/4578**

Dear Ms Palstra,

I refer to your email of 11 August 2022 in which you make a request for access to documents, registered on 12 August 2022 the above-mentioned reference number.

You request access to “*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 meeting on 2022-06-01 between Ylva Johansson and Meta Platforms Ireland Limited and its various subsidiaries (f/k/a Facebook Ireland Limited)*”.

I have identified the following documents as falling within the scope of your application:

- 1) Report of the meeting that was held between the Cabinet of Commissioner Johansson and representatives of Facebook on 01/06/2022, ref. Ares(2022)5349624;
- 2) Briefing - WeProtect Global Alliance Summit 2022 Bilaterals, ref. Ares (2022)5428895.

Having examined documents requested under the provisions of Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents (hereafter ‘Regulation 1049/2001’), I have come to the conclusion that the documents may be disclosed.

However, parts of the documents relate to information that does not concern meetings with the company concerned by your request or to previous exchanges. This information is therefore out of scope of the request and has been redacted.

Moreover, 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 1049/2001, because some of them 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;
- other information relating to an identified or identifiable natural person, such as positions held in an organisation.

Article 9(1)(b) of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data 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 put forward 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 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.

Regarding the disclosed summary record of the meeting, I wish to draw your attention to the fact that this document was drawn up for internal use under the responsibility of the relevant services of the Directorate-General for Home Affairs and Migration. It solely reflects the author's interpretation of the interventions made and do not set out any official position of the third party to which the document refers, which was not consulted on its content. It does not reflect the position of the European Commission and cannot be quoted as such.

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

Yours sincerely,

Cathrin BAUER-BULST  
Head of Unit