Subject: Your application for access to documents (2022/7089)

Dear Mr Haar,

I refer to your request for access to European Commission documents registered on (08/12/2023) under the above-mentioned reference number.

Please note that due to the wide scope of your request, covering also areas falling under the responsibility of other Directorates-General, parts of your request have been attributed to other Directorates-General. This reply relates only to the documents held by Directorate-General ECFIN, as you have been specifying in your email of 09/12/2022. We have extended the deadline for reply on 10/01/2023 and informed you on 31/01/2023 that we would need additional time to fully process your request.

You request access to “a list of meetings (from 1. May 2021 till today - meaning the time you amended the request) of Commissioner Gentiloni (...) his cabinet or representatives of DG ECFIN AND representatives of BusinessEurope, minutes and other reports of these meetings and all correspondence with entities listed above, including emails from 1. May 2021 till today."

We have identified 10 documents (plus attachments) falling under the scope of your application (see Annex).

Since the documents, except the annexes 2,2 and 5,2 (indicated with the numbers to be found in the Annex), originate from a third party, their originator (BusinessEurope) has been consulted.

1. Documents to be disclosed

We are happy to inform you that we disclose the following documents (personal data redacted):

Document 1; 1,1

Document 2; 2,1; 2,2

1 Secretariat General 2022/7086; DG BUDG 2022/7087; DG HR 2022/7088; DG TRADE 2022/7090; DG GROW 2022/7091; DG TAXUD 2022/7139.
2. Documents not to be disclosed

Following an examination of the documents indicated below under the provisions of Regulation (EC) No 1049/2001 regarding public access to documents and considering 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 1 (b) of this Regulation:

Document 8,1; 8,2

Document 9; 9,3; 9,4; 9,5

Document 10; 10,2; 10,3

We have considered whether partial access could be granted to these documents. However, they mainly consist of information constituting personal data. Thus, the remaining parts after the expunging of confidential information would either be meaningless or it would be possible to reconstruct the personal data, circumventing an effective protection of personal data.

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.

3. Remedies

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 to the Secretariat-General of the Commission within 15 working days upon receipt of this letter. You can submit it in one of the following ways:

**by asking for a review via your portal**\(^2\) **account** (available only for initial requests submitted via the portal account),

**or by mail:**

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

Yours faithfully,

Maarten VERWEY

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