Subject : Your application for access to documents under Regulation (EC) 1049/2001 – Ref.: EASE No 2023/4616

Dear Mr Azalbert,

We refer to your e-mail registered on 02 August 2023 in which you make a request for access to document, registered under the above-mentioned reference number.

You request access to documents containing the following information:

1. All correspondence exchanged in all forms and formats (electronic, paper, sms, email, whatsapp messages, EDI (electronic data interchange), or any other private or public messaging format) between the organization bearing the name "Bilderberg Meeting" ([https://urldefense.com/v3/__https://bilderbergmeetings.org/__;!!DOxrgLBmI8ImMx-06JxFx_njGdlNcFn5QzJOGS5y8FJED_StIdGV5AHet83PSeS2XEArDd8sgj[N-DD6bM18aUuLo2PmE1oun2r3yYny4KXDS](https://bilderbergmeetings.org/) and the European Commission and in particular, those of the Commissioners who participated in the events of the organization.
2. All documents received, given, or written on site during the holding of the "meetings" of the Bilderberg group or in connection with the holding of the events,
3. All reports, work and reports drawn up by the Commissioners, their teams or the Commission concerning the "Bilderberg Meeting" group, participation in its events or its relations with the European institutions and their staff,
4. The regulations, and/or decisions of the institutions which decide or supervise the participation of Commissioners in the events of the Bilderberg group, and/or the mandate given by the Commission to these Commissioners for this purpose,
5. All documents relating to the travel/subsistence/registration/participation expenses of Commissioners who participated in Bilderberg Group events,
6. All correspondence exchanged in all forms (electronic, paper, sms, email, whatsapp messages, ...) between the organisation known as the "World Economic Forum (WEF)" (https://urldefense.com/v3/__https://www.weforum.org__;!!DOxrgLBm!BImMx-06IxjFx_njGdrlNcFn5QzjOG51y8FJED_StIdGV5AHet83P5eS2XEArDd8sqjN-DB6bM18aUuo2PmE1oun2r3yQ3oXyfs$) and the European Commission and in particular Commissioners who have participated in the organisation's events,

7. All documents received, given, or written on site during the holding of the "meetings" of the World Economic Forum or in connection with the holding of events,

8. All reports, work and reports drawn up by the Commissioners, their teams or the Commission on the World Economic Forum WEF group, participation in its events and its relations with the European institutions and their staff,

9. Regulations and/or decisions of the institutions which decide or supervise the participation of Commissioners in World Economic Forum (WEF) events, and/or the mandate given by the Commission to these Commissioners for this purpose,

10. All documents relating to the travel/subsistence/registration/participation expenses of the Commissioners who participated in the World Economic Forum (WEF) events The period concerned by the requests for access to documents above is from the year 2018 to today.

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 (1). Please note that the questions assigned to Directorate General Human Resources and Security (DG HR) relate only to the documents held by Cabinet of Commissioner Hahn and or DG HR. You will receive the replies concerning the other questions and other Cabinets by Directorate-Generals in due course.

I would like to inform you that concerning the questions: 1, 2, 3, and 4 on the Bilderberg Meeting Group, the Cabinet Hahn does not hold any documents that would correspond to the description given in your request. Commissioner Hahn and his team have never participated nor being related to the Bilderberg Meeting Group or in connection with the holding of the events.

Regarding the part of your request concerning the questions: 6, 7, 8 on the World Economic Forum WEF group, requesting all the exchanges between the Commissioners who participated in the World Economic Forum (WEF) events, I can inform you that in response to your request, we have identified the following documents:

- Email from the World Economic Forum to Cabinet Hahn on 03/09/2021 (our ref. Ares (2021)5933877, (doc.1).
  Which includes the following attachment:
    o Official invitation to the World Economic Forum Annual Meeting 2022 from the President of WEF to Commissioner Johannes Hahn on 30/08/2021 (doc. 1.1).
- Email from the World Economic Forum to Cabinet Hahn on 23/12/2021 (our ref. Ares (2022)44596, (doc.3).

(1) The request was co-attributed to SG: EASE N. 2023/4613; to DG ECFIN: N. 2023/4614; to DG JUST: N. 2023/4615 and to PMO: N.4617.
Which includes the following attachment:
- Official invitation to the World Economic Forum Annual Meeting 2022 from the President of WEF to Commissioner Johannes Hahn on 20/12/2021 (doc. 3.1).

- Email from the World Economic Forum to Cabinet Hahn on 22/02/2022 (our ref. Ares (2022)1661840, (doc.4).
  Which includes the following attachment:
  - Official invitation to the World Economic Forum Annual Meeting 2022 from the President of WEF to Commissioner Johannes Hahn on 09/02/2022 (doc. 4.1).

- Email from the World Economic Forum to Commissioner Johannes Hahn on 26/05/2022 (our ref. Ares (2022)4019171, (doc.5).

- Email from the World Economic Forum to Cabinet Hahn on 09/06/2022 (our ref. Ares (2022)4282611, (doc.6).
  Which includes the following attachment:
  - Official thank note of the World Economic Forum Annual Meeting 2022 from the President of WEF to Commissioner Johannes Hahn on 09/06/2022 (doc. 6.1).

- Email from the World Economic Forum to Commissioner Johannes Hahn on 23/09/2022 (our ref. Ares (2022)6672061, (doc.7).
  Which includes the following attachments:
  - Official invitation to the World Economic Forum Annual Meeting 2023 from the President of WEF to Commissioner Johannes Hahn on 22/09/2022, (doc. 7.1).
  - Initial concept note “cooperation in a Fragmented World” (doc.7.2).

- Reply from Cabinet Hahn to the World Economic Forum invitation on 28/09/2022 (our ref. Ares (2022)667467), (doc.8).

- Email from the World Economic Forum to Commissioner Johannes Hahn on 29/05/2023 (our ref. Ares (2023)4513015, (doc.9).
  Which includes the following attachment:
  - Official invitation to the World Economic Forum Annual Meeting 2024 from the President of WEF to Commissioner Johannes Hahn on 15/06/2023 (doc. 9.1).

- Reply from Cabinet Hahn to the World Economic Forum invitation on 29/06/2023 (our ref. Ares (2023)4513032, (doc.10).

Having examined the documents requested under the provisions of Regulation (EC) No 1049/2001 regarding public access to documents, I have concluded that the following documents listed above: doc.1, 2, 3, 4, 5, 6, 7, 8, 9, 10 may be partially disclosed. Please note that some parts of the documents have been redacted, as they contain personal data.

Pursuant to Article 4(1) (b) of Regulation (EC) No 1049/2001, access to a document has to be refused if its disclosure would undermine the protection of privacy and the integrity of the individual, in particular in accordance with European Union legislation regarding the protection of personal data. The relevant legislation in this case is Regulation No 1725/2018 (2) which specifically applies to the Union institutions, bodies, offices and agencies when they process 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

(2) Regulation (EU) No 1725/2018 of 23 October 2018 on the protection of natural persons regarding the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, OJ L 295 of 21.11.2018, p. 39-98
legitimate interests of the data subject might be prejudiced. In your request, you do not 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 (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 individual concerned would not be prejudiced by disclosure of the personal data concerned. Therefore, the documents requested are disclosed expunged from this personal data.

Concerning questions 4 and 9, in which you request the regulations, and/or decisions of the institutions which decide or supervise or mandate the participation of Commissioners in the events of the Bilderberg Meeting group events and the World Economic Forum (WEF) events, we inform you that the Commission does not hold any documents that would regulate the participation in these specific fora.

Nevertheless, under the Code of Good Administrative Behaviour (3), we would like to inform you that, at the first official meeting under the chairmanship of Ursula von der Leyen, the College of Commissioners adopted its working methods regarding the organisation of political leadership: the working methods of the von der Leyen Commission (europa.eu). The document lays the foundations for how Commissioners and their Cabinets should manage contacts with stakeholders. These working methods also apply to contacts with the organisation like the Bilderberg Meeting Group and the World Economic Forum.

In parallel, the ethical rules foreseen in the Treaties and in the Code of Conduct (4) for Commissioners are also applicable.

As specified in Article 2 (3) of the Regulation 1049/2001, the right of access as defined in that regulation, applies only to existing documents in the possession of the institution. Given that no such documents, corresponding to the description given in your request, are held by the Commission, the Commission is not in a position to handle this part of your application. The Court of Justice of the EU (“CJEU”) ruled in its judgement in Case C-491/15 P that operations “not comparable to a normal or routine search in the database concerned, carried out using the search tools available to the Commission in respect of that database and that, therefore, the information requested would have required a creation of a new document”.

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 by asking

(3) CL2000Q3614EN0120010.0001.3bi_cp 1..1 (europa.eu)
for a review via your portal account (available only for initial requests submitted via the portal account), European Commission

by asking for a review via your portal 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 Brussels

or by email to: sg-acc-doc@ec.europa.eu

Yours faithfully,

Electronically signed

Gertrud Ingestad

Cc: Cabinet Hahn, DG HR Access to Documents (HR.F.6)

Attachments: Documents No (doc.1), (doc.1.1), (doc.2), (doc.3), (doc.3.1), (doc.4), (doc.5), (doc.6), (doc.6.1), (doc.7), (doc.7.1), (doc.7.2), (doc.8), (doc.9), (doc.9.1) and (doc.10).

(*) https://www.ec.europa.eu/transparency/documents-request