Subject: Your application for access to documents 2023/4615

Dear Mr. Azalbert,

We refer to your request for European Commission documents registered on 02/08/2023 under the above-mentioned reference number.

I would like to apologise for the delay in replying to your request.

In essence, you request access to all correspondence (in whatever form) between the Bilderberg Meetings organisation and the European Commission, to documents drawn up or exchanged at meetings organised by this organisation, and to reports drawn up by the Commission concerning the organisation in question or its events.

In the second part of your request, you request, in essence, access to all correspondence (in whatever form) between the World Economic Forum (WEF) and the European Commission, to documents drawn up or exchanged at meetings organised by the WEF, and to reports drawn up by the Commission concerning the WEF or its events.

I consider your request to cover documents held up to the date of your initial application, i.e. 02/08/2023.

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 the relevant Directorates-General (1). This reply relates only to the documents held by the Directorate-General for Justice and Consumers (DG JUST). You received (or will receive) the replies from the other respective Directorates-General in due course.

Please note that DG JUST does not hold any documents that would correspond to the second part of your request (related to the World Economic Forum).

Your application therefore concerns the following document:

- Request CAB REYNERS 1384 – Ares(2023)4784486

(1) 2023/4613 (SG); 2023/4614 (ECFIN); 2023/4616 (HR); 2023/4617 (PMO).
With regard to this document, a complete disclosure 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 it contains the following personal data:

- the name of a Commission staff member not pertaining to the senior management,
- the names of other natural persons, and
- other information relating to identified or identifiable natural persons (CVs).

Article 9(1)(b) of the Data Protection Regulation (2) 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 document.

Furthermore, some parts of the document have been redacted on the basis of Article 4(3), first subparagraph, of the Regulation.

According to this provision, “Access to a document, drawn up by an institution for internal use […], which relates to a matter where the decision has not been taken by the institution, shall be refused if disclosure of the document would seriously undermine the institution’s decision-making process, unless there is an overriding public interest in disclosure.”

The redacted parts of the document relate to the Commission’s legislative proposals on political advertising, artificial intelligence and strategic lawsuits against public involvement (so-called “SLAPP”). The legislative processes pertaining to the adoption of these texts are ongoing: they will have to be negotiated and adopted by the European Parliament and the Council before becoming EU laws. The proposals are therefore part of an inter-institutional decision-making process which has not yet reached formal agreement. Disclosure of the redacted parts of the document at this stage would reveal internal viewpoints and political considerations in relation to the adoption of highly sensitive legislation, thereby undermining this inter-institutional decision-making process.

The exception laid down in Article 4(3), first subparagraph of Regulation (EC) No 1049/2001 applies unless there is an overriding public interest in disclosure of the document.

In your application, you do not put forward any reasoning pointing to an overriding public interest in disclosing the document requested, and I have not been able to identify any

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public interest capable of overriding the public interests protected by Article 4(3) of Regulation (EC) No 1049/2001 either.

Please note that this document is an internal document, which was drawn up under the responsibility of the relevant services of the DG JUST. It does not reflect the position of the Commission and cannot be quoted as such.

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 mail, to:

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,

Ana GALLEG0

Enclosure: 1