Subject: Your application for access to documents EASE 2023/6161

Dear Mr Dohle,

We refer to your request for access to European Commission documents registered on 18/10/2023 under the above-mentioned reference number.

Under the right of access to documents in the EU Treaties, as developed in Regulation 1049/2001, you are requesting:


The following documents fall within the scope of your application:

- Letter of 16 March 2023 addressed to “Groupe Racines&Dignité”, Ares (2023)1918102
- Letter of 27 February 2023 addressed to « Adoptés de Roumanie », Ares(2023)1423735

Please note that, in relation to the letter of 16 March 2023, following your request of access to documents EASE(2023)1127, you have already received copy of the e-mail dated 8.12.2022, Ares(2022)8528631, mentioned in that letter.

With regard to both documents listed above, a complete disclosure of the identified documents is prevented by the exception concerning the protection of privacy and the

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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 information of Commission staff members not pertaining to the senior management;
- the names/initials and contact details of other 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.

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 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 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 sincerely,

Andreas STEIN
Head of Unit

Enclosures: 2