Subject: Reply to documents access request – EASE 2023/6924

Dear Mr Walden,

We refer to your request registered on 20 November 2023 under the above-mentioned reference number. You request access to:

“All documentation, including but not limited to attendance lists, agendas, background papers, minutes/notes and email correspondence about or summarising, the following meetings:

1. ISDA (transparency register number 46643241096-93) and John Berrigan on 22/09/2023;
2. ISDA and John Berrigan on 21/06/2022;
3. ISDA and Valeria Miceli on 21/06/2022;
4. ISDA and Mairead McGuinness on 24/06/2021 and
5. ISDA and Valdis Dombrovskis 26/02/2018.”

We have identified the following documents:

1. Ares(2021)2767528 - meeting request and reply_Redacted
2. AREs(2021)4978775 - follow up annex_Redacted
3. ARES(2021)4978775 - follow up_Redacted
4. ARES(2023)4554826 - meeting request FISMA 14251_Redacted
5. AREs(2023)6149887 - meeting request FISMA 16985_Redacted
6. ARES(2023)8036734 - Minutes_Redacted
7. AREs(2023)8081481 - meeting agenda_Redacted
8. AREs(2023)8184782 - Minutes_Redacted
9. ARES(2023)8718755 - meeting request_Redacted
10. Physical meeting FISMA 14251 minutes_Redacted
11. Physical meeting FISMA 16985 minutes_Redacted

With regard to these 11 documents listed above, a complete disclosure of the identified documents is prevented by the exception concerning the protection of the privacy and the integrity of the individual outlined in Article 4(1)(b) of Regulation (EC) No 1049/2001, as it contains personal data.

Article 9(1)(b) of the Data Protection Regulation (¹) 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 the combined provision of the Articles and Regulations quoted above, 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.

Please note that the minutes attached as document number 6, 8, 10 and 11 were drawn up for internal use under the responsibility of the relevant member of staff. They solely reflect the authors’ interpretation of the interventions made and do not set out any official position of the third party to which the documents refer, which were not consulted on their content. The documents do not reflect the position of the Commission and cannot be quoted as such.

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 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 sincerely,

Tilman LUEDER
Head of Unit

(²) https://www.ec.europa.eu/transparency/documents-request