Subject: Your application for access to documents – EASE 2024/1484

Dear Ms Verheecke,

We refer to your e-mail of 18 March 2024 in which you make a request for access to documents, registered on the same date under the above-mentioned reference number.

We apologise for the delay in the handling of your request.

You request access to “all documents—including but not limited to correspondence (including email and letters) containing substantive discussion relevant to the meeting topic, attendance lists, agendas, background papers, transcripts, recordings, minutes, notes, and meeting conclusions—relating to the participation of Genevieve Tuts in the déjeuner du cercle des réseaux européens on 12th October 2023.”

Your application concerns the following documents:

– CAB REYNDERS/2004 - Déjeuner du 12 octobre Cercle des réseaux sur le devoir de vigilance et les travaux du Commissaire Didier Reynders, Ares(2024)3537858; and

– Invitation à discuter avec les membres du Cercle des réseaux sur le devoir de vigilance et les travaux du Commissaire Didier Reynders, Ares(2024)3537293.

With regard to all documents listed above, a complete disclosure of the identified documents 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 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, we 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.

Please note that the document with reference Ares(2024)3537293 originating from third party is
disclosed to you based on Regulation (EC) No 1049/2001. However, this disclosure is without
prejudice to the rules on intellectual property, which may limit your right to reproduce or exploit
the released document without the agreement of the originator, who may hold an intellectual
property right on it. The European Commission does not assume any responsibility from their
reuse.

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 within 15 working days upon receipt of this
text to the Secretariat-General of the Commission at the following address:
European Commission
Secretariat-General
Unit C.1. ‘Transparency, Document Management and Access to Documents’
BERL 7/076
B-1049 Brussels, or by email to: sg-acc-doc@ec.europa.eu

Yours sincerely,

(e-signed)

Dan Dionisie
Head of Unit