Dear Mr Walden,

Subject: Your application for access to documents – EASE 2024/3917

I refer to your message of 27 March 2024, in which you make a request for access to documents.

Please note that due to the wide scope of your request, covering also areas falling under the responsibility of other services, your initial request was split in several applications. These have been dealt with by other services who are responsible for replying to you separately.

This reply only relates to the documents held by Unit E1 ‘Citizens, Equality, Democracy & Rule of Law’ in the Secretariat-General. This part of the request was registered on 27 March 2024 as EASE 2024/3917.

In your request, you ask for:

‘Documents including but not limited to attendance lists, agendas, background papers, minutes/notes about or summarising, the following meetings. Please exclude any email correspondences determining a time to meet.

- Zurich Insurance and cabinet of Vera Jourová regarding Corporate Sustainability and due diligence (15/05/23)

We have identified the following document as falling within the scope of your application:


Having examined the document requested under the provisions of Regulation (EC) No 1049/2001 regarding public access to documents, we have concluded that this document may be partially disclosed. A complete disclosure of the identified document is prevented by the exception concerning the protection of privacy and the integrity of the individuals outlined in Article 4(1)(b) of Regulation (EC) No 1049/2001, because they contain the following personal data:

1 DG FISMA (2024/1739) and SG.D3 (2024/1740).
- the names/initials and contact information of Commission staff members not pertaining to 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 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 this document, 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 this document was drawn up for internal use under the responsibility of the relevant service. It solely reflects the author's interpretation of the interventions made and does not set out any official position of the third parties to which the document refers, which was not consulted on its content. 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 Secretary-General of the Commission within 15 working days upon receipt of this letter. You can submit it

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

Yours sincerely,

William Sleath

Enclosure: 1