



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL  
HUMAN RESOURCES AND SECURITY  
Director-General

26 NOV. 2014

Ms Vicky Cann  
By email: [ask+request-5209-  
acf13d7f@asktheeu.org](mailto:ask+request-5209-acf13d7f@asktheeu.org)

**Subject: Your application for access to documents – Ref GestDem No 2014/2620**

Dear Ms Cann,

We refer to your e-mail dated 3 November 2014 in which you make a request for access to documents, registered on 5 November 2014.

Your application concerns "*all documents which relate to the job move by Maria Trallero to the European Federation of Pharmaceutical Industries and Associations (EFPIA) and any other external activities which she may be undertaking*". In particular you request "*a note of all Ms Trallero's job titles at DG Trade including dates held; copies of any application(s) that Ms Trallero made under Article 16 of the Staff Regulations to undertake a new professional activity; and all documents (correspondence, emails, meeting notes etc) related to the authorisation of the new role or roles.*"

I have examined your request under the provisions of Regulation No 1049/2001 regarding public access to European Parliament, Council and Commission documents.

We identified some documents which fall under the articles of the Staff Regulations you refer to in your request. These documents correspond to the form used to declare and identify any potential conflict of interest in accordance with Article 16 of the Staff Regulations.

These documents contain personal data on Ms Trallero. It is the Commission's obligation to ensure that the privacy and the integrity of its staff member concerned are correctly protected. I regret to inform you that the access cannot be granted to the requested document, as it falls under the exception in Article 4(1)(b) of Regulation 1049/2001<sup>1</sup>. While I have also considered the possibility of granting partial access, I have concluded that this would equally undermine the protection of personal data.

I can nevertheless provide you with the following general information on the process to which your request relates.

Ms Trallero submitted a declaration of intention to engage in an occupational activity after leaving the Commission (Article 16 of the Staff Regulations) registered on 5 February 2013. Her request related to a remunerated occupational activity for an

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<sup>1</sup> Regulation (EC) No 1049/2001 regarding public access to European Parliament, Council and Commission documents, OJ L 145, 31.05.2001, p.43.

indefinite period as a "Director" at the European Federation of Pharmaceutical Industries and Associations in Brussels.

The Appointing Authority gave its approval to Ms Trallero to carry out the activity on 26 February 2013, as there was no conflict with the legitimate interests of the Commission.

Ms Trallero was reminded of the specific staff obligations contained in Articles 16, 17 and 19 of the Staff Regulations, Article 19 of the Commission Decision on outside activities and assignments and Article 339 of the Treaty on the Functioning of the European Union.

I can also provide you with some information on the last post held by Ms Trallero. From 2009 to 2012 she was temporary staff at AST level in DG TRADE, working on WTO matters notably issues related to regional trade agreements. As the potential conflict of interest is assessed in the light of the activities during the last three years of service within the framework of Article 16 of the Staff Regulations, any further processing relating to the job descriptions of Ms Trallero would be disproportionate.

Please be informed that a copy of this letter will be sent to the person concerned.

In accordance with Article 7(2) of Regulation 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 within 15 working days upon receipt of this letter to the Secretary-General of the Commission at the following address:

European Commission  
Secretary-General  
Transparency unit SG-B-5  
BERL 5/327  
B-1049 Brussels

or by email to: [sg-acc-doc@ec.europa.eu](mailto:sg-acc-doc@ec.europa.eu)

Yours faithfully



Irene SOUKA