



**EUROPEAN COMMISSION**

DIRECTORATE-GENERAL FOR FINANCIAL STABILITY, FINANCIAL SERVICES AND CAPITAL MARKETS UNION

General Affairs

**Policy planning and implementation, inter-institutional relations**

Brussels, 04/12/2019

FISMA.A.2/ah/ARES/s.(2019) s. 8255536

Ms Jude Omidiran  
40 Bermondsey Street  
London  
The United Kingdom

By registered letter with  
acknowledgement of receipt

Advanced copy per e-mail

**Subject: Your request for access to documents (our ref. GESTDEM: 2019/5854)**

Dear Ms Omidiran,

We acknowledge a receipt of your e-mail dated 16 October 2019, in which you make a request for access to documents, registered under the above mentioned reference number.

Your request is as follows:

*Dear Financial Stability, Financial Services and Capital Markets Union,*

*Under the right of access to documents in the EU treaties, as developed in Regulation 1049/2001, I am requesting documents which contain the following information:*

*All documentation (including but not limited to all email correspondence, attendance lists, agendas, background papers, and minutes/notes) relating to the meetings listed below:*

*1. Between Valdis Dombrovskis, FISMA Vice-President, and DZ Bank AG (DZ Bank) on the 24th of March, 2019*

*2. Between Valdis Dombrovskis, FISMA Vice-President, and Finance Watch on the 16th of September, 2019*

*3. Between Valdis Dombrovskis, FISMA Vice-President, and AIG Europe Ltd (AIG) on the 26th of February, 2019*

*4. Between Elina Melngaile and Andrea Beltramello, Members of Cabinet, and IIGCC (IIGCC) on the 1st of October, 2019*

*5. Between Andrea Beltramello, Member of Cabinet, and Kreab and The Alternative Investment Management Association Limited (AIMA) on the 1st of October, 2019*

6. *Between Andrea Beltramello, Member of Cabinet, and Banco Santander, S.A. on the 25th of September, 2019*
7. *Between Andrea Beltramello, Member of Cabinet, and Index Industry Association (IIA) on the 24th of September, 2019*
8. *Between Andrea Beltramello, Member of Cabinet, and EuropeanIssuers (EuropeanIssuers) on the 9th of September, 2019*
9. *Between Andrea Beltramello, Member of Cabinet, and Confederazione Generale dell'Industria Italiana (Confindustria) on the 29th of July, 2019*
10. *Between Andrea Beltramello, Member of Cabinet, and Managed Funds Association (MFA) on the 8th of July, 2019*
11. *Between Jan Ceyssens, Deputy Head of Cabinet, and TheCityUK on the 6th of June, 2019*
12. *Between Andrea Beltramello, Member of Cabinet, and Intesa Sanpaolo on the 14th of May, 2019*
13. *Between Andrea Beltramello, Member of Cabinet, and The Goldman Sachs Group, Inc. (GS), Securities Industry and Financial Markets Association (SIFMA) and K&L Gates GP - Brussels on the 13th of May, 2019*
14. *Between Elina Melngaile, Member of Cabinet, and WWF European Policy Programme (WWF EPO) on the 7th of October, 2019*

*Please produce the documents on a rolling basis. I would prefer that the Commission's search and deliberations concerning particular documents not delay the production of documents the Commissions has already retrieved and decided to produce.*

Based on your request, we have identified 15 documents concerning the defined meetings.

Having examined the documents requested under the provisions of Regulation (EC) No 1049/2001 regarding public access to documents, I have come to the conclusion that they may be only partially disclosed as they contain personal data, in particular names and contact details of participants of the meetings

Personal data can only be transmitted under specific exceptional conditions, including if *'the recipient establishes that it is necessary to have the data transmitted for a specific purpose in the public interest.* According to Article 9(1)(b) of Regulation 2018/1725, the European Commission also only has to examine the further conditions for a lawful processing of personal data if the recipient has established that it is necessary to have the data transmitted for a specific purpose in the public interest. In your request, you do not put forward any arguments to establish the necessity to have the data transmitted for a specific purpose in the public interest.

Notwithstanding the above, please note that there are reasons to assume that the legitimate interests of the data subjects concerned would be prejudiced by disclosure of the personal data reflected in the documents.

Consequently, I conclude that, pursuant to Article 4(1)(b) of Regulation 1049/2001, access cannot be granted to the personal data, 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.

Should you disagree with the assessment that the redacted data are personal data, which can only be disclosed if such disclosure is legitimate under the applicable rules on the protection of personal data, you are entitled, in accordance with Article 7(2) of Regulation 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 letter 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](mailto:sg-acc-doc@ec.europa.eu)

Yours sincerely,



Dorota Kalina ZALIWSKA

Enclosure:

1. Minutes from the meeting between the VP Valdis Dombrovskis and DZ Bank AG (DZ Bank) on 24 April 2019 (instead of 24 March 2019)
2. Minutes from the meeting between the VP Valdis Dombrovskis and Finance Watch on the 26 September 2019 (instead of 16 September 2019)
3. Minutes from the meeting between the VP Valdis Dombrovskis and AIG Europe Ltd (AIG) on 26 February 2019
4. Minutes from the meeting between the Cabinet Members - Elina Melngaile and Andrea Beltramello and IIGCC (IIGCC) on 1 October 2019
5. Minutes from the meeting between the Cabinet Member - Andrea Beltramello, and Kreab and The Alternative Investment Management Association Limited (AIMA) on the 1 October 2019
6. Minutes from the meeting between the Cabinet Member - Andrea Beltramello and Banco Santander, S.A. on 25 September 2019

7. Minutes from the meeting between the Cabinet Member - Andrea Beltramello and Index Industry Association (IIA) on 24 September 2019
8. Strategic document of EuropeanIssuers
9. Minutes from the meeting between the Cabinet Member - Andrea Beltramello and EuropeanIssuers (EuropeanIssuers) on the 9th of September, 2019
10. Minutes from the meeting between the Cabinet Member - Andrea Beltramello and Confederazione Generale dell'Industria Italiana (Confindustria) on 29 July 2019
11. Minutes from the meeting between the Cabinet Member - Andrea Beltramello and Managed Funds Association (MFA) on 8 July 2019
12. Minutes from the meeting between the Deputy Head of Cabinet - Jan Ceysens and TheCityUK on 6 June 2019
13. Minutes from the meeting between the Cabinet Member - Andrea Beltramello and Intesa Sanpaolo on 14 May 2019
14. Minutes from the meeting between the Cabinet Member - Elina Melngaile and WWF European Policy Programme (WWF EPO) on 7 October 2019
15. Minutes from the meeting between the Cabinet Member - Andrea Beltramello and The Goldman Sachs Group, Inc. (GS), Securities Industry and Financial Markets Association (SIFMA) and K&L Gates GP - Brussels on 13 May 2019