



EUROPEAN COMMISSION  
Competition DG

The Director General

Brussels, 12/10/2020  
COMP/D1/EF/am

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**Subject: GESTDEM 2020/5176 – Your request of 28 August 2020 for access to documents pursuant to Regulation (EC) No. 1049/2001 relating to documents and correspondence concerning Banco Santander and TransferWise**

Dear Madam,

Thank you for your application of 28 August 2020, registered on 1 September 2020 under the abovementioned reference number, in which you request access to documents in accordance with Regulation (EC) No. 1049/2001<sup>1</sup> ("Regulation 1049/2001").

## **1. DOCUMENTS CONCERNED**

In your message you request access to the following:

1. documents related to Banco Santander and TransferWise, in particular:
  - minutes and agenda of the meeting between Executive Vice-President Vestager and Banco Santander held on 23 March 2020, and all documents prepared for the purpose of the meeting and/or exchanged during the course of the meeting,
  - all documentation (including but not limited to attendance lists, agendas, background papers, minutes/notes and email correspondence) relating to the meeting between the cabinet of Executive Vice-President Vestager and TransferWise held on 4 February 2020,
  - records of any other meetings, that took place between the second half of 2019 to date, between Banco Santander or TransferWise and Executive Vice-President

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<sup>1</sup> Regulation (EC) N° 1049/2001 regarding public access to European Parliament, Council and Commission documents, OJ L145 of 31.5.2001, p. 43

Vestager, her cabinet, and/or any other member of DG Competition, including minutes, agendas, meeting invitations, presentations, etc.,

- any correspondence – from the second half of 2019 to date – between Banco Santander or TransferWise and Executive Vice-President Vestager, her cabinet, and/or any other member of DG Competition, including letters, emails, minutes of telephone calls, etc.

## **2. IDENTIFICATION AND ASSESSMENT OF THE RELEVANT DOCUMENTS**

We have identified two types of documents as part of the scope of your request:

1. documents regarding competition cases at various procedural stages;
2. documents that are not case-related.

The documents referred to under point 1 concern Banco Santander related case files linked to antitrust investigations under Article 101/102 of the TFEU and merger proceedings under Regulation (EC) No 139/2004. As regards TransferWise, no case related documents, which would fall under the access request, were identified.

The identified documents regarding Banco Santander concern the antitrust cases AT.40452 Mobile Payments and Case AT.40514 E Payments – Poland and the merger proceedings M.9350 Santander Group/ MAPFRE GROUP/JV, M.9420 Credit Agricole/ Banco Santander/Santander Securities Services, M.9602 Banco Santander Allianz Popular, M.9849 Banco Santander/Aegon/Popular Vida, M.9910 Mapfre Group/Santander Group/Popular Seguros JV and M.9564 LSEG/Refinitiv Business.

Having carefully examined your request in the light of Regulation 1049/2001, I have come to the conclusion that the documents concerning the above referenced investigations fall under the exceptions of Article 4 of Regulation 1049/2001. Access to these documents, therefore, has to be refused. Please find below in Section 3 the detailed assessment as regards the application of the exceptions of Article 4 of Regulation 1049/2001.

The identified non-case related documents under point 2 concern Banco Santander and TransferWise. These documents consist of third party and Commission documents. As regards the documents which originate from third parties the originators of the documents have been consulted in accordance with Regulation (EC) No 1049/2001. Considering that the identified documents contain both personal data (names, e-mail accounts, phone numbers) and/or information disclosure of which would undermine the protection of commercial interests of the third parties concerned, no, or only partial access can be granted. This also applies to a number of Commission documents which discuss and/or analyse the third party documents concerned. The identified non-case related documents further include documents which have been drawn up by the Commission for internal use. Pursuant to Article 4(3), full access to these documents has to be refused as their disclosure would seriously undermine the Commission's decision-making process.

In view hereof I enclose a redacted version of the identified documents. They are listed in the annex to this letter. The purpose of the redactions is explained in more detail below in Sections 3.1, 3.2 and 5.

You may reuse the documents to which access is granted free of charge for non-commercial and commercial purposes provided that the source is acknowledged and that you do not distort the original meaning or message of the document. Please note that the Commission does not assume liability stemming from the reuse.

### **3. APPLICABLE EXCEPTIONS**

As the effects of granting access to documents under Regulation 1049/2001 are *erga omnes*, in the sense that such documents become public, the disclosure of the requested documents at this stage might hurt the protection of lawful interests, as set forth in Article 4 of Regulation 1049/2001. Once access is granted, any potential requester receives access to the documents in question, irrespective of its legal standing, involvement in the competition case or not or other specific interests it may have, as "*the purpose of the regulation is to guarantee access for everyone to public documents and not just access for the requesting party to documents concerning it*".<sup>2</sup>

#### **3.1. Article 4(2), first indent, protection of commercial interests and Article 4(2), third indent, protection of the purpose of investigations**

Pursuant to Article 4(2), first indent of Regulation 1049/2001 the Commission shall refuse access to a document where disclosure would undermine the protection of commercial interests of a natural or legal person.

Pursuant to Article 4(2), third indent of Regulation 1049/2001 the Commission shall refuse access to a document where its disclosure would undermine the protection of the purpose of inspections, investigations and audits.

These exceptions aim at protecting the Commission's capacity to ensure that Member States and undertakings comply with their obligation under European Union law. For the effective conduct of investigations it is of utmost importance that the Commission's investigative strategy, preliminary assessments of the case and planning of procedural steps remain confidential.

In *Commission v TGI*<sup>3</sup>, a case which concerned an access to documents request to all documents in two State aid cases, the Court of Justice upheld the Commission's refusal and held that there exists with regard to the exception related to the protection of the purpose of investigations a general presumption that disclosure of documents in the file

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<sup>2</sup> See Joined Cases T-110/03, T-150/03 and T-405/03, *Sison v Council*, paragraph 50; Case T-181/10, *Reagens SpA v Commission*, paragraph 143.

<sup>3</sup> See case C-139/07 *Commission v Technische Glaswerke Ilmenau GmbH (TGI)*

would undermine the purpose of State aid investigations. The Court reasoned that such disclosure would call into question the procedural system<sup>4</sup>.

The Court of Justice has upheld this reasoning in relation to documents in cases regarding the application of Articles 101 and 102 TFEU (“antitrust cases”) which are governed by the procedural rules set out in Regulation 1/2003. The disclosure of such documents would undermine the procedural rules system set up by that regulation, and in particular the rules on confidentiality and access to the file.

In the *EnBW* case, the Court of Justice held that there is, with regard to the exception related to the protection of the purpose of investigations, a general presumption that disclosure of documents in cases regarding the application of Articles 101 and 102 TFEU (“antitrust cases”), would undermine the purpose of the access system introduced by Regulations No 1/2003 and 773/2004<sup>5</sup>. As ruled by the General Court in the *Bitumen* case<sup>6</sup>, for an infringement under Article 101, if a document is not accessible under the “access to file procedure”, it cannot be made available to the public under Regulation 1049. In essence, Regulations 1/2003 and 773/2004 and Regulation 1049 have different aims but must be interpreted and applied in a consistent manner. The rules on access to file in the above-mentioned regulations are also designed to ensure respect for professional secrecy and are of the same hierarchical order as Regulation 1049/2001 (so that neither of the two sets of rules prevails over the other).

The same reasoning can be applied with regard to the documents which are part of mergers case-files. In its judgment in Case C-404/10 P *Commission v Odile Jacob*<sup>7</sup>, the Court of Justice held that for the purposes of interpretation of the exceptions in Article 4(2), first and third indent of Regulation 1049/2001, there is a general presumption that disclosure of documents exchanged between the Commission and notifying and other (third) parties in merger procedures in principle undermines the protection of the commercial interests of the undertakings involved and also the protection of the purpose of investigations related to the merger control proceedings.

The Court ruled that, by analogy to the case law in cases *TGI*<sup>8</sup>, *Bavarian Lager*<sup>9</sup> and *API*<sup>10</sup>, Regulation 1049/2001 has to be interpreted and applied in a manner which is compatible and coherent with other specific rules on access to information. The Court referred in particular to the Merger Regulation and emphasised that it not only governs a

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<sup>4</sup> See also Case C-514/07 P, *API v Commission*, paragraphs 99 and 100, as well as Case C-404/10 P *Commission v Odile Jacob*, paragraphs 108-126 where the Court of Justice applied *Commission v TGI* by analogy to merger proceedings

<sup>5</sup> Case C-365/12 P *Commission v EnBW Energie Baden-Württemberg*, judgment of 27 February 2014, paragraph 88

<sup>6</sup> Case T 380/08, paragraphs 32-40

<sup>7</sup> Case C-404/10 P, *Commission v Odile Jacob*, [2013] ECR

<sup>8</sup> Case C-139/07 P, *Commission v Technische Glaswerke Ilmenau*, [2010] ECR I-5885

<sup>9</sup> Case C-28/08 P, *Commission v Bavarian Lager*, [2010] ECR I-6055

<sup>10</sup> Cases C-514/07 P, C-528/07 P and C-532/07 P, *Sweden and Others v API and Commission*, [2010] ECR I-8533

specific area of European Union law, but is also designed to ensure respect for professional secrecy and is, moreover, of the same hierarchical order as Regulation 1049/2001 (so that neither of the two set of rules prevails over the other). The Court stated that, if documents in the merger case-files were to be disclosed under Regulation 1049/2001 to persons other than those authorised to have access according to the merger control legislation, the scheme instituted by that legislation would be undermined. In that regard, the Court ruled that this presumption applies regardless of whether the request for access concerns merger control proceedings which have already been closed or proceedings which are pending.

The Court recognized in *Agrofert*<sup>11</sup> that general presumptions of non-disclosure are applicable to merger control proceedings, because the legislation which governs those proceedings also provides for strict rules regarding the treatment of information obtained or established in the context of such proceedings. The disclosure of such documents would undermine the procedural rules system set up by the Merger Regulation, and in particular the rules on professional secrecy and access to the file.

As ruled by the Court in the *Agrofert* case<sup>12</sup>, if a document is not accessible under the "access to file procedure", it cannot be made available to the public under Regulation 1049. In essence, the Merger Regulation and Regulation 1049 have different aims but must be interpreted and applied in a consistent manner. The rules on access to file in the Merger Regulation are also designed to ensure respect for professional secrecy and are of the same hierarchical order as Regulation 1049/2001 (so that neither of the two sets of rules prevails over the other).

Natural and legal persons submitting information in the context of the Merger Regulation have a legitimate expectation that – apart from the publication of the Section 1.2 of the Form CO and of the final decision cleared of business secrets and other confidential information – the information they supply to the Commission on an obligatory or voluntary basis under the Merger Regulation will not be disclosed.

As regard the cases which are definitively closed, it should be noted that the prospect of publication of sensitive information concerning the economic activities of the undertakings involved after a procedure is closed runs the risk of adversely affecting the willingness of undertakings to cooperate when such a procedure is pending.<sup>13</sup> The EU Courts have confirmed the applicability of the general presumption regardless of whether the request concerns a closed or pending procedure. In its *Deutsche Telekom* judgment<sup>14</sup>, the General Court has held that, when it comes to antitrust investigations, having regard to the nature of the interests protected, a general presumption applies regardless of whether the request for access concerns an investigation which has already been closed or one which is pending.

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<sup>11</sup> Case C-404/10 P, *Commission v Agrofert Holding*, [2013] ECR, paragraph 59

<sup>12</sup> *Agrofert*, paragraphs 32-40

<sup>13</sup> See the *Deutsche Telekom* judgment, case T-210/15, paragraphs 44-45. See also, by analogy, the *Odile Jacob* and *Agrofert* judgments quoted therein

<sup>14</sup> Case T-210/15, *Deutsche Telekom v Commission*, judgment of the General Court of 28 March 2017, paragraphs 31, 43 and 45 (ECLI:EU:T:2017:224). See also, by analogy, the *Odile Jacob*, *TGI* and *Agrofert* judgments quoted therein

In view of the foregoing, the documents identified under point 1 of Section 2 are covered in their entirety by the exception related to the protection of the purpose of the Commission's competition investigations set out in Article 4(2), third indent of Regulation 1049/2001.

Economic entities have a legitimate commercial interest in preventing third parties from obtaining strategic information on their essential, particularly economic interests and on the operation or development of their business. Moreover, the related assessments made by the Commission and contained in Commission's documents are also commercially sensitive.

The documents requested by you, as specified above, have not been brought into the public domain and are known only to a limited number of persons. In particular, the documents you request access to contain commercial and market-sensitive information regarding the activities of the involved undertakings whose public disclosure would undermine the latter's commercial interests. This information concerns in particular commercial strategies. As disclosure of the documents under point 1 of Section 2 could bring serious harm to the companies' commercial interests, they are also covered in their entirety by the exception set out in Article 4(2), first indent of Regulation 1049/2001.

As regards the documents under point 2 of Section 2, no access or only partial access can be provided. The parts which are covered by the exception set out in Article 4(2), first indent as explained above will be redacted from the copies you will receive in the annex. It concerns documents from TransferWise, Banco Santander and Commission documents, which discuss and/or analyse these documents. The documents concerned contain commercially sensitive information regarding TransferWise's products and services, on confidential agreements with critical business partners and on its business strategy. As regards Banco Santander the documents disclose its subjective understanding of the strengths and weaknesses of market operators, ongoing projects which are not yet in the public domain and the timing thereof and its views on a number of regulatory issues. Disclosure of this information would undermine the legitimate commercial interests of TransferWise and Banco Santander as set out in Article 4 (2) first indent of Reg. 1049/2001.

### **3.2. Article 4(3) protection of the institution's decision-making process**

Pursuant to Article 4(3), access to the documents drawn up by the Commission or received by the Commission shall be refused if the disclosure of the documents would seriously undermine the Commission's decision-making process.

The case related documents identified under point 1 of Section 2 contain assessments of the facts and other information from which the direction of the investigation, the procedural steps which the Commission may take, as well as its investigative strategy may be revealed to the public. This information could easily be misinterpreted or misrepresented and cause damage to the reputation and standing of the companies investigated, in particular if no decision is adopted establishing a violation of the competition rules. Moreover, the requested documents would reveal the Commission's investigation strategy and their disclosure would therefore undermine the protection of the purpose of the investigation and would also seriously undermine the Commission's decision making process. The Commission's services must be free to explore all possible options in preparation of a decision free from external pressure.

In view of the foregoing, the internal Commission documents and documents received by the Commission in the files corresponding to the requested documents under point 1 of Section 2 are also covered by the exception related to the protection of the Commission's decision-making process, set out in Article 4(3) of Regulation 1049/2001.

The non-case related documents identified under point 2 of Section 2 include Commission documents drawn up by the Commission for internal use in preparation for meetings with third parties. They include interpretations of competition policy and describe possible policy developments, which are not in the public domain. Disclosing those internal interpretations would seriously undermine the Commission's decision-making process by revealing information which would reduce the Commission's capacity for enforcing the competition rules. In order for the enforcement practice to be operational and effective, the concrete internal tools and deliberations should remain confidential. This process should be protected from external interference and pressures. Therefore, the exceptions set out in Article 4 (3), first and second subparagraphs of the Regulation are manifestly applicable to the documents under point 2 of Section 2 and only partial access can be granted to these documents.

#### **4. OVERRIDING PUBLIC INTEREST IN DISCLOSURE**

Pursuant to Article 4 (2) and (3) of Regulation 1049/2001, the exception to the right of access contained in that Article must be waived if there is an overriding public interest in disclosing the documents requested. In order for an overriding public interest in disclosure to exist, this interest, firstly, has to be public (as opposed to private interests of the applicant) and, secondly, overriding, i.e. in this case it must outweigh the interest protected under Article 4 (2), first and third indent, and 4 (3) of Regulation 1049/2001.

In your application you have not established arguments that would present an overriding public interest to disclose the documents to which access has been hereby denied. Consequently, the prevailing interest in this case lies in protecting the effectiveness of the Commission's investigations, its decision-making process and the commercial interests of the undertakings concerned.

#### **5. ARTICLE 4(1)(B): PROTECTION OF PRIVACY OF INDIVIDUALS**

Pursuant to Article 4(1)(b) of Regulation (EC) No 1049/2001, access to a document (or Sections of it) has to be refused if its disclosure would undermine the protection of privacy and the integrity of the individual, in particular in accordance with European Union legislation regarding the protection of personal data. The applicable legislation in this field is Regulation (EC) No 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC ('Regulation 2018/1725')<sup>15</sup>.

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<sup>15</sup> OJ L 205 of 21.11.2018, p. 39.

A full disclosure of the documents identified under point 2 of Section 2 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;
- handwritten signatures/abbreviated signatures of 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, I conclude that, pursuant to Article 4(1)(b) of Regulation 1049/2001, no access can 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. Therefore, you receive a redacted version of these documents.

## **6. PARTIAL ACCESS**

As regards the case related documents under point 1 of Section 2, the general presumption of non-disclosure (Section 3.1.) also applies to partial disclosure of the identified documents. Consequently, no partial access can be granted to these documents.

As regards the non-case related documents identified under point 2 of Section 2, we can as explained above and depending on the document, provide you with partial access.

## **7. MEANS OF REDRESS**

If you want this position to be reviewed you should write to the Commission's Secretary-General at the address below, confirming your initial request. You have fifteen (15) working days in which to do so from receipt of this letter, after which your initial request will be deemed to have been withdrawn.

The Secretary-General will inform you of the result of this review within fifteen (15) working days from the registration of your request, either granting you access to the documents or confirming the refusal. In the latter case, you will be informed of how you can take further action.

All correspondence should be sent to the following address:



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](mailto:sg-acc-doc@ec.europa.eu).

Yours faithfully,

e-Sign  
Olivier GUERSENT

Annex: List of non-case related documents covered by the access request

Enclosure: redacted versions of the listed documents

## **Annex:**

### **List of non-case related documents identified under point 2**

Where present, personal data have been removed from the documents listed below, as explained in Section 5.

#### **Documents concerning TransferWise:**

1. TransferWise meeting request sent to DG COMP by email of 13 January 2020 and DG COMP reply by email of 15 January 2020

The document includes commercially sensitive information. Disclosure of this information would undermine the legitimate commercial interests of TransferWise as set out in Article 4(2) of Regulation 1049/2001. The application of this exception is explained in Section 3.1.

2. TransferWise agenda for meeting of 4 February 2020 and added background information on TransferWise

The document includes discussion points on a TransferWise initiative that has not yet been launched publicly as well as commercially sensitive information. Disclosure of this information would undermine the legitimate commercial interests of TransferWise as set out in Article 4(2) of Regulation 1049/2001.

3. Internal DG COMP briefing for meeting with TransferWise of 4 February 2020

The document has been drawn up for internal Commission use. The disclosure of parts of the document would seriously undermine the institution's decision-making process as set out in Article 4(3) of Regulation 1049/2001. The application of this exception is explained in Section 3.2.

4. TransferWise email to DG COMP of 5 February 2020 following-up on meeting of 4 February 2020

The email contains three annexes:

- TransferWise letter to the Open Banking Implementation Entity in the UK;
- TransferWise Policy paper on instant payments and
- TransferWise Policy paper on direct access

The email and its annexes contain commercially sensitive information regarding TransferWise's products and services, on confidential agreements with critical business partners and on its business strategy. The disclosure of this information would undermine the legitimate commercial interests of TransferWise as set out in Article 4(2) of Regulation 1049/2001.

5. DG COMP email to TransferWise of 6 February 2020 responding to a TransferWise email of 5 February 2020

The document includes commercially sensitive information. Disclosure of this information would undermine the legitimate commercial interests of TransferWise as set out in Article 4(2) of Regulation 1049/2001.

#### **Documents concerning Banco Santander:**

1. Letter of Banco Santander to Commissioner Vestager of 15 July 2019 including two annexes:
  - Side-by side comparison of bank pay and tech pay
  - Effects on time to market that a bank faces when launching a new solution

The two annexes (in one document) to the letter include commercially sensitive information. They refer to Banco Santander's subjective understanding of the strengths and weaknesses of market operators, ongoing projects which are not yet in the public domain and the timing thereof. Disclosure of this information would undermine the legitimate commercial interests of Banco Santander as set out in Article 4(2) of Regulation 1049/2001.

2. DG COMP email to Banco Santander of 17 July 2019 concerning Banco Santander letter of 15 July 2019
3. String of internal DG COMP emails to change the scheduled meeting of 23 March 2020 between EVP Vestager and Banco Santander - for Covid-19 related reasons - into a conference call on 26 March 2020

The document has been drawn up for internal Commission use. The disclosure of parts of the document would seriously undermine the institution's decision-making process as set out in Article 4(3) of Regulation 1049/2001.

4. Internal DG COMP briefing for call of EVP Vestager with Banco Santander on 26 March 2020

The document has been drawn up for internal Commission use. The disclosure of parts of the document would seriously undermine the institution's decision-making process as set out in Article 4(3) of Regulation 1049/2001. Furthermore, the document includes information provided by Santander which is commercially sensitive. Disclosure of this information would undermine the legitimate commercial interests of Banco Santander as set out in Article 4(2) of Regulation 1049/2001.

5. String of emails between Banco Santander and DG COMP: 30 March – 24 April 2020. Santander's email of 31 March 2020 includes an annex:

- Towards an European data economy

The emails and the annex include commercially sensitive information, which explains how data may be used to improve Banco Santander's performance and customer service and experience. Disclosure of this information would undermine the legitimate commercial interests of Banco Santander as set out in Article 4(2) of Regulation 1049/2001.

6. Internal DG COMP email of 31 March 2020 analysing Banco Santander paper: towards an European data economy

The document has been drawn up for internal Commission use. It includes commercially sensitive information laid down in Banco Santander's policy paper towards a European data economy referred to under document 5. Disclosure of this information would undermine the legitimate commercial interests of Banco Santander as set out in Article 4(2) of Regulation 1049/2001.

7. Internal DG COMP email of 24 April 2020 containing minutes of DG COMP call with Banco Santander of same date

The document has been drawn up for internal Commission use and covers the main takeaways from a conference call between DG COMP and Banco Santander. It includes information on Banco Santander's subjective understanding of the strengths and weaknesses of market operators, ongoing projects which are not yet in the public domain, the timing thereof and its main business challenges and opportunities. Disclosure of this information would undermine the legitimate commercial interests of Banco Santander as set out in Article 4(2) of Regulation 1049/2001.

8. Banco Santander email to DG COMP of 27 May 2020 requesting statistics on State aid cases

9. DG COMP email to Banco Santander of 29 May 2020 with statistics on State aid cases

10. DG COMP email of 19 June 2020 inviting Banco Santander to participate in the Public consultation on the European Commission initiative for a New Competition Tool

11. Email of Banco Santander to DG COMP of 10 July 2020 including four annexes:

- Suggestion to adapt the bank regulatory framework to digital
- European data strategy for finance
- Digital finance for European Commission
- [Confidential]

The email and its four annexes include commercially sensitive information. The documents reveal Banco Santander's competitive position in the market: its advantages and points for improvement in comparison with other market operators and its views on a number of regulatory issues. Several parts of the documents refer to specific market operators that are necessary suppliers for Banco Santander. Annex 4 is non-accessible in its entirety. Disclosure of this information would undermine the legitimate commercial interests of Banco Santander as set out in Article 4(2) of Regulation 1049/2001.

12. DG COMP email to Banco Santander of 10 July 2020 in reply to Banco Santander email of same date

13. DG COMP email of 17 July 2020 inviting Banco Santander to participate as a panellist at 2020 DG COMP Hearing on the Interchange Fees Regulation, including one annex

- Draft agenda for COMP IFR Hearing.