



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR TRANSLATION

The Director-General (acting)

Brussels
DGT/CE (2022)4053436

Alexander Fanta
netzpolitik.org
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Germany

***By registered mail with
acknowledgment of receipt
Advance copy by email:
ask+request-11108-
1ce5a08f@asktheeu.org***

Subject: Your application for access to documents

Ref.: GestDem No 2022/2442

Dear Mr Fanta,

We refer to your message of 25 April 2022 in which you make a request for access to documents, registered on 29 April 2022 under the above-mentioned reference number.

You request access to:

1. Memos, guidance, guidelines, or training material (or any other document) for staff on record creation and/or record keeping, especially on creation/keeping of text messages.
2. Memos, guidance, guidelines, or training material (or any other document) for staff on the processing of access to information requests.

We have identified the following documents:

1. Ares filing, DGT, 15/03/2021, Ares(2016)5506068 (hereafter 'document 1')
2. Ares which emails should be registered?, DGT, 13/07/2021, Ares(2016)5506068 (hereafter 'document 2')

Commission européenne, 2920 Luxembourg, LUXEMBOURG - Tel. +352 43011
Office: Ariane 03/C47 - Tel. direct line +352 4301-30271 - Fax +352 4301-30799

Commission européenne/Europese Commissie, 1049 Bruxelles/Brussel, BELGIQUE/BELGIË - Tel. +32 22991111
Office: G--6 06/030 - Tel. direct line +32 229-88476 - Fax +32 229-30799

Christos.ELLINIDES@ec.europa.eu

3. Document lifecycle step by step, DGT, 19/11/2021 (hereafter 'document 3')
4. Internal - Incoming and Outgoing mail, DGT, 10/03/2021 Ares(2016)5506068, (hereafter 'document 4')
5. Glossary on administrative document management, DGT, 04/07/2012, Ares(2016)5506068 (hereafter 'document 5')
6. Explanatory notes and background file in Ares, DGT, 22/09/2016, Ares(2016)5506068 (hereafter 'document 6')

With regard to documents 1, 2 and 6 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.

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 (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.

Furthermore, with regard to document 2 listed above, some images have been blanked out to protect intellectual property of a third party in accordance with Article 4(2), first indent of Regulation (EC) No 1049/2001.

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 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

Yours faithfully,

Christos ELLINIDES

Annexes: 6