

DIRECTORATE GENERAL SECRETARIAT

Mathias Schindler

[ask+request-8096-681d94e8@asktheeu.org](mailto:ask+request-8096-681d94e8@asktheeu.org)

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Reference: LS/PS/2020/31

## Request for public access to ECB documents

Dear Mr Schindler

On 8 June 2020 the European Central Bank (ECB) received your application for access to “[...] any information related to Palantir and its products and services, including:

- a) meeting records (drafts, memos, invitations, appointments, cancellations) involving Palantir officials and people representing Palantir and their interests
- b) correspondence (including within the [ECB] and with the European institutions concerning Palantir technologies and / or its products and services or the regulatory environment of the EU that affects their products and services. This may include policy papers, consultation input, memoranda or any other form of information.
- c) invoices, tenders, service agreements, purchases, orders, procurement documents, offers etc. concerning products and services using Palantir Technologies.”

On 6 June 2020, in line with Article 7(3) of Decision ECB/2004/3<sup>1</sup> on public access to ECB documents and owing to the increased workload created by a high number of simultaneous requests, the ECB extended the stipulated time limit for reply by a 20 working days.

## Identification of the requested documents

The ECB, after having carefully examined your request in line with Decision ECB/2004/3, has identified two ECB documents of relevance to your application, namely two emails relating to the logistics of the meeting between Palantir Technologies and former member of the ECB’s Executive Board, Mr Benoît Coeuré, on 26 January 2018 in Davos. This meeting is included in Mr Coeuré’s publicly available calendar<sup>2</sup>.

## Assessment of disclosure

Following a thorough assessment in line with the requirements set out in Decision ECB/2004/3 and in consultation with the relevant third party, the ECB considers that, subject to the redaction of personal data,

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<sup>1</sup> Decision ECB/2004/3 of 4 March 2004 on public access to European Central Bank documents (OJ L 80, 18.3.2004, p. 42)

<sup>2</sup> [Link to January 2018 Mr Coeuré's calendar](#)

access to the documents identified can be granted (see attachments) since no other exceptions listed in Article 4 of the Decision apply.

**Redaction of personal data**

Parts containing personal data of staff members of the ECB or of third parties have been redacted, together with any information that would make the data subjects identifiable. Personal data are protected by Article 4(1)(b) of Decision ECB/2004/3 in conjunction with Article 9 of Regulation (EU) 2018/1725 of the European Parliament and of the Council . Article 9(1)(b) of Regulation (EU) 2018/1725 stipulates that, for the transfer of personal data, the recipient must establish a necessity to have personal data transmitted for a specific purpose in the public interest. Since you have not established such a necessity, access to personal data in the documents must be refused on the basis of Article 4(1)(b) of Decision ECB/2004/3.

**Final remarks**

Please note that, in line with Article 10 of Decision ECB/2004/3, "Documents released in accordance with this Decision shall not be reproduced or exploited for commercial purposes without the ECB's prior specific authorisation. The ECB may withhold such authorisation without stating reasons."

Yours sincerely,

[signed]

Petra Senkovic  
Director General Secretariat

[signed]

Margarita-Louiza Karydi  
Head of the Compliance and Governance Division