

From: [redacted] (CNECT)
To: [redacted] (CNECT)
Cc: [redacted] (CNECT)
Subject: FW: Implementing act Directive 2019/1024/EU
Date: jeudi 28 janvier 2021 16:37:39
Attachments: [Position Paper PSI-HVD's submitted by the Member State of the Netherlands_20200923.docx](#)

FYI – the Dutch position paper on company data vs personal data protection

From: [redacted]@ec.europa.eu>
Sent: Wednesday, September 23, 2020 2:10 PM
To: [redacted]@ec.europa.eu>; [redacted]
(CNECT) <[redacted]@ec.europa.eu>
Cc: [redacted]@ec.europa.eu>
Subject: FW: Implementing act Directive 2019/1024/EU

From: [redacted] <[redacted].nl>
Sent: Wednesday, September 23, 2020 2:05 PM
To: 'edps@edps.europa.eu' <edps@edps.europa.eu>
Cc: [redacted] <[redacted].nl>;
[redacted]
<[redacted]>
Subject: Implementing act Directive 2019/1024/EU

Dear Mr. [redacted],
Please find attached for your information the position paper submitted by the Member state of the Netherlands on the implementing act that the committee is preparing as a result of the latest PSI-directive. The Member state of the Netherlands is concerned about the Committee's ambition to adopt an implementing act, which the Member States require to publish personal data, that form a part of three high-value datasets (company data, company owner data and insolvency data), on the EU Open Data Portal. The attached position paper has been brought to the attention of the Commission (DG-CNECT) and of several member states that, like the Netherlands, have concerns about the protection of personal data.
The Netherlands has requested the Commission to ask EDPS for advice as a vital process step in the preparation of the implementing act.
Kind regards,
[redacted]

Ministry of Economic Affairs and Climate

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