



**EUROPEAN COMMISSION**  
DIRECTORATE-GENERAL FOR MOBILITY AND TRANSPORT

Directorate E - Aviation  
**E.1 – Aviation Policy**

Brussels  
MOVE.DDG2.E1

Ms Paula Castro  
40 Bermondsey Street,  
London SE1 3UD  
UK

*By email with request for acknowledgement  
of receipt:*

[ask+request-9219-  
40e444a6@asktheeu.org](mailto:ask+request-9219-40e444a6@asktheeu.org)

**Subject: Your application for access to documents – GESTDEM 2021/1760**

Dear Ms Castro,

We refer to your e-mail of 19 March 2021 in which you make a request for access to documents, registered on 23 March 2021 under the above mentioned reference number.

You request access to “All documentation, including but not limited to, attendance lists, agendas, background papers, minutes/notes and email correspondence about or summarising, the following meetings of Director-General Henrik Hololei or the Cabinet members of Commissioner Director-General Henrik Hololei with multiple organisations.

1. Meeting with Airlines for Europe (A4E) on the 03/03/2021 on Future of aviation
2. Meeting with European Regions Airline Association Ltd. (ERA), Airlines for Europe (A4E), International Air Transport Association (IATA), EUROPEAN BUSINESS AVIATION ASSOCIATION (EBAA), Airlines International Representation in Europe (AIRE) on the 03/03/2021 on SES2+
3. Meeting with Airbus on the 09/02/2021 on Hydrogen strategy
4. Meeting with General Electric Company (GE) on Covid-19, SAF”

We have identified the following documents, which are relevant to your application:

1. The notes from the meeting (call) held with A4E on 3 March 2021 (attached as file “Flash report\_ HH call with A4E - 3 March 2021\_Redacted”)
2. The attendance list and notes from the meeting (call) held with Airlines for Europe (A4E), International Air Transport Association (IATA), European Regions Airline Association Ltd. (ERA), and EUROPEAN BUSINESS AVIATION ASSOCIATION (EBAA) on 3 March 2021 (ref. Ares(2021)2474651, attached as file “SES2 - minutes meeting 3rd March 2021\_Redacted”)

3. Attendance list and agenda for the meeting (call) held with General Electric (GE) on 3 February 2021 on recovery and sustainable flight (attached as file “RE\_ Invitation to meet with President & CEO GE Aviation on recovery and sustainable flight\_Redacted”)
4. The notes from the meeting (call) held with GE Aviation on 3 February 2021 (attached as file “Flash report\_ HH call with GE Aviation CEO\_Redacted”)

Having examined the documents requested under the provisions of Regulation (EC) No 1049/2001 regarding public access to European Parliament, Council and Commission documents<sup>1</sup> (hereinafter ‘Regulation (EC) No 1049/2001’), I have come to the conclusion that they may be partially disclosed. Some parts of all four documents have been redacted since their disclosure is prevented by exception to the right of access laid down in Article 4 of this Regulation.

Pursuant to Article 4(1)(b) of Regulation (EC) No 1049/2001, access to a document 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 (EU) 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<sup>2</sup> (‘Regulation 2018/1725’).

Some of the documents to which you request access contain personal data, in particular the names, signatures, contact details (email, telephone numbers) online identifiers/initials and/or initials pertaining to Commission staff members and other individuals.

Pursuant to Article 9(1)(b) of Regulation 2018/1725, ‘personal data shall only be transmitted to recipients established in the Union other than Union institutions and bodies if ‘[t]he recipient establishes that it is necessary to have the data transmitted for a specific purpose in the public interest and the controller, where there is any reason to assume that the data subject’s legitimate interests might be prejudiced, establishes that it is proportionate to transmit the personal data for that specific purpose after having demonstrably weighed the various competing interests’.

Only if these conditions are fulfilled and the processing constitutes lawful handling in accordance with the requirements of Article 5 of Regulation 2018/1725, can the transmission of personal data occur.

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. Therefore, the European Commission does not have to examine whether there is a reason to assume that the data subject’s legitimate interests might be prejudiced.

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, as there is a real and non-hypothetical risk that such public disclosure would harm their privacy and subject them to unsolicited external contacts.

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<sup>1</sup> Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents, OJ L 145, 31.05.2001, p. 43.

<sup>2</sup> Regulation (EU) 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, OJ L 205 of 21.11.2018, p. 39.

Consequently, I conclude that, pursuant to Article 4(1)(b) of Regulation (EC) No 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.

In case you would 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 (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](mailto:sg-acc-doc@ec.europa.eu)

Finally, I kindly ask you to confirm receipt of this email.

Yours faithfully,

Flor DIAZ PULIDO  
Head of Unit  
*e-signed*

