



**EUROPEAN COMMISSION**

DIRECTORATE-GENERAL FOR FINANCIAL STABILITY, FINANCIAL SERVICES AND CAPITAL  
MARKETS UNION

Financial Markets  
**Asset Management**

Brussels  
FISMA.C.4/VK(2022)

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Dear Mr Peters,

**Subject: Your application for access to documents – GESTDEM 2022/3756**

We refer to your e-mail registered on 30 June 2022 in which you make a request under the above mentioned reference number.

You request access to “*a list of all meetings and informal consultations and the respective content of those that have taken place between the unit C4 Asset Management including their lobby associations (such as AFG - Association Française de la Gestion financière, Association of the Luxembourg Fund Industry (ALFI), etc.) between 01.01.2020 and today*”.

On 6 July 2022 (letter ARES (2022)4937733) we wrote to you proposing to narrow the scope of your request to meetings and informal consultations (and the respective content of those) that have taken place between the unit C4 Asset Management and lobby associations during May and June 2022.

In the absence of any reaction from your part, and in order to deal with your request within a reasonable timeframe, we have narrowed the scope as proposed.

We have identified 12 documents falling under the narrowed scope of your request. We have listed them in the annex enclosed to this letter.

Having examined the 12 documents under the provisions of Regulation (EC) No 1049/2001 regarding public access to documents, we have come to the conclusion that they may be partially disclosed. Personal data contained in these 12 documents have been blanked out as their disclosure is prevented by exception to the right of access laid down in Article 4(1)(b) of this Regulation.

Article 9(1)(b) of the Regulation (EU) 2018/1725 on the protection of natural persons with regard to the processing of personal data 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 put forward any arguments to establish the necessity to have the data transmitted for a specific purpose in the public interest.

Consequently, we 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.

Please note that minutes were drawn up for internal use under the responsibility of the relevant services of the Directorate-General for Financial Stability, Financial Services and Capital Markets Union. They solely reflect the services' interpretation of the interventions made and do not set out any official position of the third parties to which the documents refer, which were not consulted on their content. They do not reflect the position of the Commission and cannot be quoted as such.

In accordance with Article 7(2) of Regulation (EC) No 1049/2001, you are entitled to make 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 Secretary-General of the Commission at the following address:

European Commission  
Secretariat-General  
Transparency, Document Management & Access to Documents (SG.C.1)  
BERL 7/076  
B-1049 Brussels  
or by email to: [sg-acc-doc@ec.europa.eu](mailto:sg-acc-doc@ec.europa.eu)

Yours sincerely,

Alain DECKERS  
Head of Unit

Encl.: List of documents and 12 documents.