



EUROPEAN COMMISSION

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

General Affairs

Policy planning and implementation, inter-institutional relations

Ms Paula CASTRO
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Brussels,

Subject: Your application for access to documents – Case 2022/6069

Dear Ms Castro,

We refer to your request for access to the European Commission documents registered on 26 October 2022 under the above-mentioned reference number.

You requested access to: “[a]ll documentation, including, but not limited to, attendance lists, agendas, background papers, minutes/notes and email correspondence about or summarising, the following meetings of the Director-General John Berrigan with organisations.

1. *Meeting with Deutsche Bank AG (DB) on 14/09/2022 regarding "Bank and insurance prudential files";*
2. *Meeting with Managed Funds Association (MFA) on 20/07/2022 regarding "AIFMD, MFA in Europe";*
3. *Meeting with Insurance Europe (Insurance Europe) on 27/06/2022 regarding "Solvency II/IRRD";*
4. *Meeting with Sumitomo Mitsui Financial Group (SMBC Group) on 02/06/2022 regarding "Sanctions, Taxonomy";*
5. *Meeting with Standard Chartered on 11/05/2022 regarding "Basel III and SF".*

We have identified a total of 10 documents under the scope of your request. They are all listed in the attachment.

A complete disclosure of these 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 personal data.

Article 9(1)(b) of the Data Protection Regulation¹ 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, we conclude that pursuant to the combined provision of the Articles and Regulations quoted above, access cannot be granted to the personal data contained in the requested documents.

Furthermore, please consider that documents 2, 4, 6, 8, and 10 are minutes that were drawn up for internal use under the responsibility of the relevant member of staff. The minutes solely reflect the author's interpretation of the interventions made and do not set out any official position of the third parties to which the documents refer, who were not consulted on their content. The minutes do not reflect the position of the Commission and cannot be quoted as such.

Documents 1, 2, 3, 4 and 5 originate from a third party. The originators of the documents have been consulted in accordance with Article 4(4) of Regulation (EC) No 1049/2001 regarding public access to European Parliament, Council and Commission documents with a view to assessing whether an exception provided for in Article 4 of this Regulation is applicable. They have all agreed to the disclosure the text of these documents with the redaction of personal data for the reason explained above.

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 to the Secretariat-General of the Commission within 15 working days upon receipt of this letter. You can submit it in one of the following ways:

by asking for a review via your portal² account (available only for initial requests submitted via the portal account),

or by mail:

European Commission

Secretariat-General

Transparency, Document Management & Access to Documents (SG.C.1)
BERL 7/076

¹ 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 295, 21.11.2018, p. 39.

² <https://www.ec.europa.eu/transparency/documents-request>

B-1049 Bruxelles

or by e-mail to: sg-acc-doc@ec.europa.eu

Yours sincerely

Electronically signed

Head of Unit

Enclosures: List of identified documents and 10 documents.