



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

General Affairs

Policy planning and implementation, inter-institutional relations

Brussels

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Subject: Your application for access to documents – EASE 2023/2429

Dear Ms Castro

We refer to your request for access to European Commission documents registered on 26 April 2023 under the above-mentioned reference number.

You requested 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 between Director-General John Berrigan with organisations and industry:

- 1. Insurance Europe (Insurance Europe) with DG John Berrigan on 17/02/2023 on 'Solvency II review, Retail Investment Strategy';*
- 2. HSBC Holdings PLC (HSBC) with DG John Berrigan on 27/01/2023 on 'Taxonomy';*
- 3. Fidelity International (FIL) with DG John Berrigan on 26/01/2023 on 'Retail investment strategy, SFDR';*
- 4. The Investment Association (IA) with DG John Berrigan on 26/01/2023 on 'Retail investment strategy, CMU action plan';*

We have identified eight documents that fall in the scope of your request (see the attached list).

The documents number 1, 3, 5 and 7 originate from third parties. The originators of the documents have been consulted in accordance with Article 4(4) of Regulation 1049/2001 with a view to assessing whether an exception provided for in Article 4 of that Regulation is applicable. They agree to disclose the documents with redaction of personal data and any other information that can allow the identification of data subjects.

Please note that documents 2, 4, 6 and 8 are minutes and they were drawn up for internal use under the responsibility of the relevant member of staff. They solely reflect the authors' 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. The documents do not reflect the position of the Commission and cannot be quoted as such.

We would like to inform you that according to Article 4(1)(b) of Regulation (EC) No 1049/2001, personal data have been redacted in all documents.

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 neither 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 combined with the disposal of Article 9(1)(b) of the Regulation (EU) 2018/1725, access cannot be granted to the personal data contained in the requested documents.

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 portal¹ 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
B-1049 Bruxelles

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

Yours sincerely

e-signed
Head of Unit

Attachments: List of identified documents and eight documents.

¹ <https://www.ec.europa.eu/transparency/documents-request>