



EUROPEAN COMMISSION  
SECRETARIAT-GENERAL

Directorate D - Policy Co-ordination I  
SG.D.2-Internal Market and Competitiveness

Brussels,  
SG.D2 TB/isk

Ms Vicky Cann  
Corporate Europe Observatory  
26, Rue d'Édimbourg  
B-1050, BE

Reply request to: [ask+request-5176-5b5bc46d@asktheeu.org](mailto:ask+request-5176-5b5bc46d@asktheeu.org)

**Subject: Your application for access to documents: Ref. GestDem N° 2018/1116**

Dear Ms Cann,

You've received an email from SG ACCES DOCUMENTS ([sg-acc-doc@ec.europa.eu](mailto:sg-acc-doc@ec.europa.eu)) to the email address [ask+request-5176-5b5bc46d@asktheeu.org](mailto:ask+request-5176-5b5bc46d@asktheeu.org) on 23 February 2018, informing you about the receipt of your request to access-to-documents, as well as its registration under the Ref. GestDem N° 2018/1116.

## 1. SCOPE OF YOUR REQUEST

You requested access to documents:

"[...]"

*Under the right of access to documents in the EU treaties, as developed in Regulation 1049/2001, I am requesting a list of lobby meetings held by the Secretariat General on any or all of the following dossiers since November 2015:*

- *Transparency for tax planning intermediaries*
- *EU list of non-cooperative jurisdictions for tax purposes' (blacklisted tax havens)*
- *Anti-Money-Laundering Directive (AML)*
- *Country-by-country reporting*
- *Common Consolidated Corporate Tax Base and / or the Common Corporate Tax Base*
- *A Fair and Efficient Tax System in the European Union for the Digital Single Market*

*The list should include: date, individuals attending + organisational affiliation, the issues discussed.*

"[...]"

## 1. DISCLOSURE OF DOCUMENTS

We have identified the following document to be partially disclosed, as follows:

	Registration N°	Registration Date	Subject/Title
1.	Ares(2018)1317004	9/3/2018	Réunion avec la Fédération Bancaire Française - financement du terrorisme

Part of the document to which you have requested access contains personal data.

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 Community legislation regarding the protection of personal data. The applicable legislation in this field is Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data.

When access is requested to documents containing personal data, Regulation (EC) No 45/2001 becomes fully applicable. According to Article 8(b) of this Regulation, personal data shall only be transferred to recipients if they establish the necessity of having the data transferred to them and if there is no reason to assume that the legitimate rights of the persons concerned might be prejudiced.

We consider that, with the information available, the necessity of disclosing the aforementioned personal data to you has not been established and that it cannot be assumed that such disclosure would not prejudice the legitimate rights of the persons concerned. Therefore, we are disclosing the documents requested expunged from this personal data.

If you wish to receive these personal data, we invite you to provide us with arguments showing the need for having these personal data transferred to you and the absence of adverse effects to the legitimate rights of the persons whose personal data should be disclosed.

In case you would disagree with the assessment that the expunged data are personal data which can only be disclosed if such disclosure is legitimate under the rules of personal data protection, you are entitled, in accordance with Article 7(2) of Regulation 1049/2001, 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  
Secretary-General  
Transparency unit SG-B-4  
BERL 5/282  
B-1049 Bruxelles

or,

by email to: [sg-acc-doc@ec.europa.eu](mailto:sg-acc-doc@ec.europa.eu)

Yours faithfully,



Marcel Haag