



## EUROPEAN COMMISSION

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

General Affairs

Policy planning and implementation, inter-institutional relations

Brussels, 15/07/2019

FISMA.A.2/ah/ARES/s.(2019) s. 5000499

Mr Kenneth Haar  
Overgaden oven Vandet 12  
1415 Copenhagen  
Denmark

By registered letter with  
acknowledgement of receipt

Advanced copy per e-mail

**Subject: Your request for access to documents (our ref. GESTDEM: 2019/3527)**

Dear Mr Haar,

Thank you for your e-mail dated 19 June 2019, in which you make a request for access to documents, registered under the above mentioned reference number.

Your request is as follows:

*'To DG FISMA, Commissioner Dombrovski and his cabinet*

*Dear Sir or Madam.*

*Under the right of access to documents in the EU treaties, as developed in Regulation 1049/2001, I am requesting documents which contain the following:*

- A list of meetings between representatives for the ICMA, Rabobank, Crédit Agricole (including the Crédit Agricole Corporate Investment Bank) AND Commissioner Valdis Dombrovskis and his cabinet as well as DG FISMA.*
- Minutes of meetings between representatives for the ICMA, Rabobank, Crédit Agricole (including the Crédit Agricole Corporate Investment Bank) AND Commissioner Valdis Dombrovskis and his cabinet as well as DG FISMA.*
- Any written communication, including emails, between representatives for the ICMA, Rabobank, Crédit Agricole (including the Crédit Agricole Corporate Investment Bank) AND Commissioner Valdis Dombrovskis and his cabinet as well as DG FISMA.*

*In all cases, the request covers the time since 1 October 2017.'*

After a search, one meeting falling under your request was identified, namely the meeting between the Commissioner Dombrovskis' Cabinet and the Crédit Agricole Assurances on 22 March 2018. We have identified the minutes from this meeting.

Having examined the document requested under the provisions of Regulation (EC) No 1049/2001 regarding public access to documents, I have come to the conclusion that it may be only partially disclosed as it contains personal data, in particular names and contact details. Therefore, some parts of the document have been blanked out and their disclosure is prevented by exception to the right of access laid down in Article 4 of this Regulation, for data protection reasons.

Personal data can only be transmitted under specific exceptional conditions, including if *'the recipient establishes that it is necessary to have the data transmitted for a specific purpose in the public interest'*. According to Article 9(1)(b) of Regulation 2018/1725, the European Commission also only has to examine the further conditions for a lawful processing of personal data if the recipient has established that it is necessary to have the data transmitted for a specific purpose in the public interest. 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.

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 document.

Consequently, I conclude that, pursuant to Article 4(1)(b) of Regulation 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.

Should you 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 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 Bruxelles, or by email to: [sg-acc-doc@ec.europa.eu](mailto:sg-acc-doc@ec.europa.eu)

Yours sincerely,



Dorota Kalina ZALIWSKA

Enclosure:

Minutes from the meeting between Crédit Agricole Assurances and Mr Andrea Beltramello held on 22 March 2018.