



AFFGEN.2
Head of Division

Brussels, 26 FEB. 2020
eeas.sg.affgen.2 (2020) 1088328

Ms Margarida da Silva

Subject: Your request for access to documents of 16 January 2020
Our ref: 2020/004

Dear Ms da Silva,

We refer to your request dated 16/01/2020 in which you make a request for access to documents related to Mr. Sabathil's working relationship with the EEAS.

Your application is currently being handled. However, we will not be in a position to complete the handling of your application within the time limit, which expires on 28/02/2020.

Exceptionally, an extended time limit is needed as each identified document needs to be assessed individually. The requested documents contain a substantial amount of personal data and according to the case-law¹, when a request is made for public access to documents under Regulation (EC) 1049/2001² containing personal data, the legal framework on data protection becomes fully applicable. Therefore, special attention is needed to analyse these documents also under the Regulation (EU) 2018/1725 on the processing of personal data by the Union institutions and bodies.³ Unfortunately, such a detailed analysis cannot be carried out by 28/02/2019.

¹ Judgment of 29 June 2010, Commission v Bavarian Lager, C-28/08 P, EU:C:2010:378, paragraph 63.

² Regulation (EC) No 1049/2001 of the European Parliament and of the Council regarding public access to European Parliament, Council and Commission documents.

³ 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 from 21.11.2018, L 295, p.39

We will of course make every effort to process your request as quickly as possible.

Yours sincerely,



Gabriele Visentin