



EUROPEAN COMMISSION

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

Policy planning and implementation, inter-institutional relations
Head of Unit

Brussels,
FISMA A2 DZ/db/fv/3643803

Ms Rebecca Vaughan
40 Bermondsey Street
London
United Kingdom

***By registered letter with
acknowledgement of receipt***

Advanced copy per e-mail

Subject: Your request for access to documents (our ref. GESTDEM: 2020/1493)

Dear Ms Vaughan,

Thank you very much for your e-mail dated 13 March 2020, in which you make a request for access to documents, registered under the above mentioned reference number.

Your request is as follows:

“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 information:

All documentation (including but not limited to all email correspondence, attendance lists, agendas, background papers, and minutes/notes) relating to the meetings listed below:

- 1. Between Andrea Beltramello, Cabinet member of Valdis Dombrovskis and Afore Consulting on the 10th February 2020*
- 2. Between Andrea Beltramello, Cabinet member of Valdis Dombrovskis and FTI Consulting Belgium on the 14th November 2019*
- 3. Between Andrea Beltramello, Cabinet member of Valdis Dombrovskis and Kreab on the 1st October 2019*
- 4. Between Andrea Beltramello, Cabinet member of Valdis Dombrovskis and K&L Gates GP - Brussels on the 13th May 2019*
- 5. Between Andrea Beltramello, Cabinet member of Valdis Dombrovskis and FTI Consulting Belgium on the 19th March 2019*

6. *Between Olivier Guersent, Director-General and Rud Pedersen Public Affairs Company (Rud Pedersen PA) on the 28th June 2018*

7. *Between Andrea Beltramello, Cabinet member of Valdis Dombrovskis and Fleishman-Hillard on the 17th April 2018*

8. *Between Valdis Dombrovskis, Vice-President, Elina Melngaile, Cabinet member of Valdis Dombrovskis and Hume Brophy (HB) on 10th April 2018*

9. *Between Marlene MADSEN, Cabinet member of Jyrki Katainen and Global Counsel Limited (GC) on the 12th December 2017*

10. *Between Valdis Dombrovskis, Vice-President and Afore Consulting on the 30th November 2017*

As regards your request addressed to DG FISMA, after a search, we could identify 10 documents which are enclosed with a list of documents. Item 9 of your request doesn't concern DG FISMA, please confirm your interest for this item, which will be transferred to the competent Directorate General.

Having examined the documents requested under the provisions of Regulation (EC) No 1049/2001 regarding public access to documents, I have come to the conclusion that they may be only partially disclosed as they contain personal data, in particular names and contact details. Therefore, some parts of the documents 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 documents.

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

You will receive a complementary answer concerning the other documents requested.

Yours sincerely,

[e-signed]

Dorota Kalina ZALIWSKA

Enclosures: List of documents and 10 documents redacted