



## 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/3689727

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: 2020/2027)**

Dear Ms Vaughan,

Thank you very much for your e-mail dated 9 April 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 Valdis Dombrovskis and Bank of America Merrill Lynch (BofAML) on 24th January 2020*
- 2. Between Sofja Ribkina and Bundesverband der Deutschen Industrie e.V. (BDI) on 4th March 2020*
- 3. Between Mirzha De Manuel and Institute of International Finance (IIF) on 19th February 2020*
- 4. Between Andrea Beltramello and Aviva Plc on 17th February 2020*
- 5. Between Andrea Beltramello and Afore Consulting on 10th February 2020*
- 6. Between Jérôme Deslandes & Vanessa Mock and Association Française des Entreprises Privées / French Association of Large Companies (AFEP) on 5th February 2020*

7. *Between Andrea Beltramello and Association française des sociétés Financières (ASF) on 22nd January 2020*

8. *Between Andrea Beltramello and Assicurazioni Generali S.p.A on 11th December 2019*

9. *Between Andrea Beltramello and Zurich Insurance Company Ltd on 29th November 2019*

10. *Between DG FISMA and BlackRock on 13th March 2020*

11. *Between DG FISMA and ABN AMRO Bank on 19th February 2020*

12. *Between DG FISMA and The Alternative Investment Management Association Limited (AIMA) on 31st January 2020"*

As regards your request addressed to DG FISMA, after a search, we could identify 8 documents which are enclosed with a list of documents.

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](mailto: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 8 documents redacted