



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR INTERNAL MARKET, INDUSTRY, ENTREPRENEURSHIP
AND SMES

The Director-General

Brussels
GROW.D.2/AS

Vicky Cann
CEO
Rue d'Edimbourg 26
1050 Brussels

Sent by email only to:
ask+request-
83332f3d0444@asktheeu.org

Subject: Reply to your request for access to documents under Gestdem 4184_2020

Dear Madam,

We refer to your e-mail of 9 July 2020 in which you make a request for access to documents, registered on the same day under the above-mentioned reference number.

You request access to:

“Under the right of access to documents in the EU treaties, as developed in Regulation 1049/2001, I would like to request a list of all lobby meetings (including face to face, phone calls, conference calls etc) held since 1 January 2019 with any of the following:

1. Precheza
2. DEZA
3. Association of Chemical Industry of the Czech Republic (SCHP ČR) 4. Association of Paint Manufacturers of the Czech Republic (AVNH) 5. Czech Plastic Cluster

The list should include the names of the individuals participating; the date; the agenda; and any minutes / notes produced. I would additionally like to receive any emails or other correspondence sent to or received from any of the above organisations since 1 January 2019.

Please provide all responses electronically via this site”.

Your application concerns the 3 documents attached in Annex.

With regard to all documents listed above, a complete disclosure of the identified documents is prevented by the exception concerning the protection of privacy and the integrity of the individual outlined in Article 4(1)(b) of Regulation (EC) No 1049/2001, because they contain the following personal data:

- the names/initials and contact information of Commission staff members not pertaining to the senior management;
- the names/initials and contact details of other natural persons;
- handwritten signatures/abbreviated signatures of natural persons.

Article 9(1)(b) of the Data Protection Regulation does not allow the transmission of these personal data, except if you prove that it is necessary to have the data transmitted to you for a specific purpose in the public interest and where there is no reason to assume that the legitimate interests of the data subject might be prejudiced. In your request, you do not express any particular interest to have access to these personal data nor do you put forward any arguments to establish the necessity to have the data transmitted for a specific purpose in the public interest.

Consequently, I conclude that, pursuant to Article 4(1)(b) of Regulation (EC) No 1049/2001, access cannot be granted to the personal data contained in the requested documents, 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.

Please note that documents originating from third parties are disclosed to you based on Regulation (EC) No 1049/2001. However, this disclosure is without prejudice to the rules on intellectual property, which may limit your right to reproduce or exploit the released document/documents without the agreement of the originator, who may hold an intellectual property right on it/them. The European Commission does not assume any responsibility from their reuse.

In case you would disagree with this position, you are entitled, in accordance with Article 7(2) of Regulation (EC) No 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 Brussels, or by email to: sg-acc-doc@ec.europa.eu

Yours faithfully,

(e-signed)

Kerstin Jorna