



**EUROPEAN COMMISSION**  
JOINT RESEARCH CENTRE  
Directorate I – Competences  
Text and Data Mining  
Head of Unit

Brussels,  
JRC/CM Ares(2021)

***By registered letter with  
acknowledgment of receipt<sup>1</sup>***

Mr Roland Zonai  
Karolyi utca 6.  
Kecskemet  
6000  
Hungary

***Sent by pdf only to:***  
[ask+request-9259-caefae68@asktheeu.org](mailto:ask+request-9259-caefae68@asktheeu.org)

Dear Mr Zonai,

**Subject: Your application for access to documents – Ref. GestDem No 2021/2011**

We refer to your request dated 30th March 2021, sent via Asktheeu platform, in which you make a request for access to documents, registered on the same date under the above-mentioned reference number.

## **1. SCOPE OF THE REQUEST**

You request access to the following:

*- The number and details of all the license agreements signed with public authorities of EU Member states for the use of the CompareD platform and the associated Semantic Similarity Tool for the evaluation of R&I funding and research proposals being developed by the TIM team ["CompareD Proposal Evaluation Tools"];*

*([https://ec.europa.eu/isa2/actions/semantic-similarity-platform-research-innovation-grant-applications\\_en](https://ec.europa.eu/isa2/actions/semantic-similarity-platform-research-innovation-grant-applications_en)*

*[https://ec.europa.eu/isa2/sites/isa/files/2018.07\\_compared.pdf](https://ec.europa.eu/isa2/sites/isa/files/2018.07_compared.pdf))*

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<sup>1</sup> According to standard operational procedure, the reply is usually also sent to you by registered post. Please note, however, that due to the extraordinary health and security measures currently in force during the COVID-19 epidemics, which include the requirement for all Commission non-critical staff to telework, we are unfortunately not in a position to follow this procedure until further notice. We would therefore appreciate if you could confirm receipt of the present e-mail.

- any available general and technical documents, slides, and presentations regarding the CompareD Proposal Evaluation Tools;

- any privacy impact assessment of the CompareD Proposal Evaluation Tools;

- In addition, I am requesting all information related to the CompareD Proposal Evaluation Tools, especially regarding the administrative arrangements, creation, development and open access schedule, and finalization, assignment, preparation and implementation of the CompareD Proposal Evaluation Tools. This may include correspondence, emails, notes, presentations, files, letters and memos sent to and from the JRC as well as the TIM team.

I request all the aforementioned documents in electronic format.

I consider your request to cover documents held up to the date of your initial application, i.e. 30<sup>th</sup> March 2021.

## 2. IDENTIFICATION AND ASSESSMENT OF THE DOCUMENTS

We have identified **8** documents falling under the scope of your request:

1. Description of the project in the ISA<sup>2</sup> work programme entitled “3.7 COMPARED - Text Mining Solution to Support the Evaluation Process of Research Grant Applications (2018.07)” (ref. Ares(2021)2801609)
2. Agenda 1st meeting Steering group (ref. Ares(2021)2801609)
3. Minutes first meeting Steering group entitled “20180607\_COMPARED 1st mtg minutes2” (ref. Ares(2021)2801609)
4. Agenda closing pilot meeting (ref. Ares(2021)2801862)
5. Minutes closing pilot meeting entitled “CompareD minutes meeting Dec 2019” (ref. Ares(2021)2801862)
6. Presentation “Compared Closing pilot project meeting” (ref. Ares(2021)2801862)
7. Update January 2019 (ref. Ares(2021)2801714)
8. Presentation Compared 1<sup>st</sup> Meeting steering group (ref. Ares(2021)2801609).

Having examined these documents under the provisions of Article 4 of Regulation (EC) N°1049/2001 regarding public access to documents<sup>2</sup>, we have come to the following conclusion:

- **4** documents can be fully provided (documents n° 2, 4, 7 and 8)
- **4** documents can be partially disclosed (document n°1, 3, 5 and 6).

The project is still in its testing phase. Through the development of a semantic similarity platform that would select documents relevant to the evaluation process, COMPARED aims at supporting evidence-based decision-making in the field of public funding of R&I. The description of the project can be found in the ISA<sup>2</sup> work programme (see document n°1).

Regarding the demand for license agreements signed with public authorities of EU Member states for the use of the CompareD platform, there is no license in place with public authorities in Member States at the moment.

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<sup>2</sup> Regulation (EC) No 1049/2001 regarding public access to European Parliament, Council and Commission documents (OJ L 145, 31.5.2001, p. 43).

Regarding any privacy impact assessment: Compared is not deployed yet and there is no privacy issues. If deployed, Compared will use public information like:

- Cordis data ([https://cordis.europa.eu/search?q=contenttype%3D%27project%27%20AND%20\(%27biodiversity%20conservation%27\)&p=2&num=100&srt=Relevance:decreasing](https://cordis.europa.eu/search?q=contenttype%3D%27project%27%20AND%20(%27biodiversity%20conservation%27)&p=2&num=100&srt=Relevance:decreasing)),
- patents (<https://www.epo.org/searching-for-patents/business/patstat.html>),
- scientific publications (<https://www.scopus.com/search/form.uri?display=basic#basic>).

Regarding any administrative arrangements, creation, development and open access schedule, and finalization, assignment, preparation and implementation of the Compared Proposal Evaluation Tools, including correspondence, emails, notes, presentations, files, letters and memos sent to and from the JRC as well as the TIM team: there are no agreements of any sort with public authorities nor with any other entities.

Summarising the outcome of the assessment carried out on the basis of Regulation (EC) No 1049/2001, documents n°1, 3, 5 and 6 are partly accessible for the reasons explained in point 3. *Legal Analysis* hereunder.

### **3. LEGAL ANALYSIS**

The legal analysis below focuses on the list of derogations in Article 4 of Regulation (EC) No 1049/2001.

#### **3.1. Reasons for partial disclosure**

##### *3.1.1. Article 4(1)(b) of Regulation (EC) No 1049/2001 – Protection of privacy and the integrity of the individual*

Personal data were redacted in documents n°1, 3, 5 and 6. They were the sole redactions in those documents.

With regard to these documents, 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.

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, we 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.

You may reuse public documents, which have been produced by the European Commission or by public and private entities on its behalf based on the Commission Decision on the reuse of Commission documents. You may reuse the document/documents disclosed free of charge and for non-commercial and commercial purposes provided that the source is acknowledged and that you do not distort the original meaning or message of the document/documents. Please note that the Commission does not assume liability stemming from the reuse.

In case you would disagree with this position, in accordance with Article 7(2) of Regulation (EC) No 1049/2001, you are entitled to make 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  
Transparency, Document Management and Access to Documents (SG.C.1)  
BERL 7/076  
B-1049 Bruxelles

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

Yours faithfully,

*e-signed*  
Matthew KING

Enclosures: 8 disclosed documents