



**EUROPEAN COMMISSION**

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

Financial Markets  
Securities markets

Brussels

FISMA.C.3/ARES(2021)5002322

**Subject: Your application for access to documents – GESTDEM 2021/4025**

Dear Madam,

We refer to your e-mail of 17 June 2021 in which you make a request for access to documents, registered on 18 June 2021 under the above-mentioned reference number.

You request access to all documentation relating to the following meetings:

- Meeting with International Capital Market Association (ICMA) on 22.01.2020;
- Meeting with Association for Financial Markets in Europe (AFME) – MIFID Review on 03-02-2021.

Please find attached two documents related to those meetings.

Please also find the link to the publication of the study of ICMA :

<https://www.icmagroup.org/assets/documents/Regulatory/Secondary-markets/ICMA-Interim-Commission-Study-EU-bond-consolidated-tape-17-Feb-2020-180220.pdf>, which was presented at the meeting on 22.01.2020.

With regard to the 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; and
- 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 put forward any arguments to establish the necessity to have the data transmitted for a specific purpose in the public interest.

Ms Lora Verheecke

[ask+request-9327-66bf864c@asktheeu.org](mailto:ask+request-9327-66bf864c@asktheeu.org)

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.

The documents were drawn up for internal use under the responsibility of the relevant service of the Directorate-General for Financial Stability, Financial Services and Capital Markets Union. It solely reflects the service's interpretation of the interventions made and does not set out any official position of the third parties to which the documents refer, which was not consulted on its content. It does not reflect the position of the Commission and cannot be quoted as such.

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](mailto:sg-acc-doc@ec.europa.eu)

Yours faithfully,

Electronically signed

Tilman LUEDER  
Head of Unit