



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MIGRATION AND HOME AFFAIRS

Directorate D – Internal Security  
The Director and Commission Counter-Terrorism Coordinator

HOME.D.4

Ms Astrid Fischer

*Per e-mail with acknowledgment of receipt:*

[ask+request-16490-f8ae61cb@asktheeu.org](mailto:ask+request-16490-f8ae61cb@asktheeu.org)

**Subject: Your application for access to documents – EASE 2025/5488**

Dear Ms Fischer,

I refer to your request for access to European Commission documents registered on 24<sup>th</sup> October 2025 under the above-mentioned reference number.

You request access to: *“Information related to a meeting on 04/09/2025 in Brussels between Thorn (ID number in the Transparency Register: "854246640306-96") and Cathrin Bauer-Bulst as well as Magnus Brunner (or one of the two). The meeting is listed in the Transparency Register. My request covers all correspondence related to the meeting (before and after), documents exchanged at the meeting, agenda, participants and minutes of the meeting”*.

## **I. IDENTIFICATION OF THE RELEVANT DOCUMENTS**

The following documents have been identified as falling within the scope of your request:

- 1.1. Follow-up ECLAG documents, Ares(2025)8344588
  - 1.2. 2025.07 - ECLAG Reaction DK Proposal, Ares(2025)8344588
  - 1.3. Joint ECLAG - DOT Position Paper AI-CSAM, Ares(2025)8344588
  - 1.4. ECPAT Konzept Parlamentarisches Frühstück, Ares(2025)8344588
  - 1.5. Reply to Follow-up ECLAG documents, Ares(2025)8344588
  - 1.6. 2025.09.05 - ECLAG CSAR Statement, Ares(2025)8322924
  - 1.7. Concept note for speakers, Ares(2025)8344588
  - 1.8. Balancing Cybersecurity, Privacy and Child Protection in detecting Child Sexual Abuse in End-to-End Encrypted Spaces, Ares(2025)9317787
2. Meeting with CAB and European Federation for Missing and Sexually Exploited Children (Missing Children Europe) (MCE), Eurochild, AISB, Terre des Hommes International Federation (TDHIF), Thorn, Stichting ECPAT International (ECPAT International).

## II. ASSESSMENT OF THE IDENTIFIED DOCUMENTS

Having examined the documents under the provisions of Regulation (EC) No 1049/2001 of the European Parliament and the Council regarding public access to European Parliament, Council and Commission documents (hereinafter ‘Regulation (EC) No 1049/2001’) <sup>(1)</sup>, I have come to the conclusion that

- **documents 1.2 to 1.4, 1.6 to 1.8 and 2** can be fully disclosed, while
- **documents 1.1 and 1.5** can be partially disclosed.

Please find my detailed assessment below.

### 1. Full disclosure

Please find enclosed a copy of documents 1.2 to 1.4, 1.6 to 1.8 in their original format and the link to document 2, which is already publicly available below:

Document 2.: [Meetings with interest representatives](#)

### 2. Partial disclosure

In accordance with Article 4(1)(b) of Regulation (EC) No 1049/2001, “[t]he institutions shall refuse access to a document where disclosure would undermine the protection of [...] privacy and the integrity of the individual, in particular in accordance with Community legislation regarding the protection of personal data”.

**Documents 1.1 and 1.5** 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;
- other information relating to an identified or identifiable natural person, such as positions held in an organization and address;
- photos where the identities of natural persons could be recognized;
- the details of the online meeting.

Article 9(1)(b) of the *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data* <sup>(2)</sup> 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 put forward 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

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<sup>(1)</sup> OJ L 145, 31.5.2001, p. 43; ELI: <http://data.europa.eu/eli/reg/2001/1049/oj>.

<sup>(2)</sup> OJ L 295, 21.11.2018, p. 39; ELI: <http://data.europa.eu/eli/reg/2018/1725/oj>.

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.

As a result, please find attached **documents 1.1 and 1.5** in a redacted version, from which the protected personal data has been removed.

*Disclaimer*

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 <sup>(3)</sup>. You may reuse the 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 documents. Please note that the Commission does not assume liability stemming from the reuse.

### 3. MEANS OF REDRESS

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 to the Secretary-General of the Commission within 15 working days upon receipt of this letter. You can submit it:

**by asking for a review via your portal <sup>(4)</sup> account** (available only for initial requests submitted via the portal account),

**by mail to:** European Commission, Secretariat-General  
Document Management & Access to Documents (SG.A.2)  
BERL 7/076  
B-1049 Bruxelles

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

### 4. ACKNOWLEDGMENT OF RECEIPT

Finally, I note that your request has been submitted outside the EASE portal. Therefore, I would appreciate, if you could **acknowledge receipt of the present letter by sending an email to [HOME-ACCESS-DOCUMENTS@ec.europa.eu](mailto:HOME-ACCESS-DOCUMENTS@ec.europa.eu)**.

Yours faithfully,

Floriana SIPALA

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<sup>(3)</sup> OJ L 330, 14.12.2011, p. 39, ELI: <http://data.europa.eu/eli/dec/2011/833/oj>.

<sup>(4)</sup> <https://www.ec.europa.eu/transparency/documents-request>

