



EUROPEAN CENTRAL BANK
EUROSYSTEM

ECB-UNRESTRICTED

DIRECTORATE GENERAL SECRETARIAT

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Request for public access to ECB documents pertaining to the meeting between the European Central Bank and Member of the European Parliament Maite Pagazaurtundúa on the draft Information Security Directive

Dear Mr Fanta,

On 9 October 2025 the European Central Bank (ECB) received your application for public access to “any document connected to a meeting between the European Central Bank and Member of the European Parliament Maite PAGAZAURTUNDÚA on 14 February 2023 regarding the draft Information Security Directive”. In your application you further specified that “this request is meant to encompass meeting minutes, e-mails exchanged before or after the meeting, position papers, or any other documents”.

The ECB, after having examined your request in accordance with [Decision ECB/2004/3¹](#), has identified one ECB document of relevance to your application, namely the presentation given by ECB members of staff during the relevant meeting between the European Central Bank and the Member of the European Parliament in her capacity as Shadow Rapporteur, Ms Maite Pagazaurtundúa. For the sake of transparency, having interpreted your request as focused on the contents of the meeting, organisational emails exchanged to organise the meeting were deemed out of scope.

Assessment of the requested documents for disclosure

Following a thorough assessment in line with the requirements set out in Decision ECB/2004/3 on public access to ECB documents, the ECB considers that access to the identified presentation can be granted in full, subject to the redaction of personal data of ECB staff, since none of the exceptions listed in Article 4 of the Decision apply.

¹ Decision ECB/2004/3 of the European Central Bank of 4 March 2004 on public access to European Central Bank documents (OJ L 80, 18.3.2004, p. 42).

For your background information, the meeting took place virtually on 14 February 2023² and focused on the European Commission proposals regarding EU Information and Cyber-Security Regulations, respectively. In the meeting, a presentation was delivered with no further exchanges or follow-up with Ms Pagazaurtundúa. No meeting minutes were taken.

Finally, we would like to take the opportunity to inform you that a similar presentation was given by the ECB to the Council Security Committee on 4 May 2023. This presentation was requested in October 2023 via a Public Access request submitted to the Council. Access to it was granted in full, subject to redaction of personal data of ECB staff and the presentation is accessible via the ECB's Public Register³.

Protection of personal data

In the identified presentation parts containing personal data of staff members of the ECB (e.g., names, contact details), together with any information that would make the data subjects identifiable. Personal data is protected by Article 4(1)(b) of Decision ECB/2004/3 in conjunction with Article 9 of Regulation (EU) 2018/17252 which stipulates that, for the transfer of personal data, the recipient must establish a necessity to have personal data transmitted. Since you have not established such a necessity, access to personal data in the documents must be refused on the basis of Article 4(1)(b) of Decision ECB/2004/3.

Means of Redress

Article 7(2) of Decision ECB/2004/3 provides that "in the event of total or partial refusal, the applicant may, within 20 working days of receiving the ECB's reply, make a confirmatory application asking the ECB's Executive Board to reconsider its position."

Final remarks

Please note that, in line with Article 10 of Decision ECB/2004/3, "Documents released in accordance with this Decision shall not be reproduced or exploited for commercial purposes without the ECB's prior specific authorisation. The ECB may withhold such authorisation without stating reasons."

Yours sincerely,

[signed]

Petra Senkovic
Director General Secretariat

[signed]

Roman Schremser
Chief Compliance and Governance Office

² Meeting details registered and visible via the Legislative Observatory of the European Parliament: [https://oeil.secure.europarl.europa.eu/oeil/en/procedure-file?reference=2022/0084\(COD\)](https://oeil.secure.europarl.europa.eu/oeil/en/procedure-file?reference=2022/0084(COD))

³ ECB's Public Register – presentation to the Council Security Committee: https://www.ecb.europa.eu/ecb/access_to_documents/document/pa_document/shared/data/ecb.dr.par2023_0056_presentation_confidentiality_regime20230504.en.pdf?4d1227718882c1fcc1fa0fc62bb21857