



Brussels,
SG.E./

Mr Arun Dohle
Email: ask+request-14492-
ebbf1116@asktheeu.org

Subject: Your application for access to documents EASE 2024/2121

Dear Mr Dohle,

We refer to your request registered on 21 April 2024 under the reference number above.

In your request, you ask for access to:

“The Note General Secretariat on trafficking in children in Romania - 2000 - Note of the General Secretariat of 24 November 2000, about a meeting in the EP's Foreign Affairs Committee, including ARES registration and circulation sheet. Including any other documents related to that note.”

The following document corresponds to your request:

- ‘Note SP(2000) 4260 of 24 November 2000’, relating to the summary record of the meeting of the European Parliament Committee on Foreign Affairs, Human Rights, Common Security and Defence Policy of 21-22 November 2000.

Having examined the document requested under the provisions of Regulation (EC) No 1049/2001 regarding public access to documents, I have concluded that the document may be partially disclosed.

Please note that only point 3 ‘Other business: Institutionalised children in Romania and trafficking in children’ falls within the scope of your application. The information is limited as the point was discussed *in camera*. Therefore, no report was produced.

The other parts of the document have been redacted because they are out of scope as they do not concern the topic you refer to in your request.

Moreover, these parts concern topics which relate to EU foreign policy and their disclosure would undermine the protection of the public interest as regards international relations in the sense of the third indent of Article 4(1)(a).

In addition, a complete disclosure of the document 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 it contains the following personal data:

- the names and contact information of Commission staff members not pertaining to senior management;
- the names, functions, contact details and biometrical data of other natural persons who are not public figures acting in their public capacity.

Article 9(1)(b) of the Data Protection Regulation¹ 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.

Consequently, I conclude that, pursuant to Article 4(1)(b) of the Regulation on access to documents, access cannot be granted to the personal data, 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 also note that this document was drawn up for internal use under the responsibility of the relevant services of the Secretariat-General of the European Commission. It solely reflects the services' interpretation of the interventions made and does not set out any official position of the third parties to which the document refers, which was not consulted on its content. It does not reflect the position of the Commission and cannot be quoted as such.

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 Secretariat-General of the Commission within 15 working days upon receipt of this letter. You can submit it in one of the following ways:

by asking for a review via your portal ⁽²⁾ account (available only for initial requests submitted via the portal account),

or by mail:

European Commission
Secretariat-General
Transparency, Document Management & Access to Documents (SG.C.1) BERL 7/076
B-1049 Bruxelles

or by email to: sg-acc-doc@ec.europa.eu

Yours sincerely,

¹ Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, OJ L 295, 21.11.2018, p. 39.

⁽²⁾ [Electronic Access to Commission Documents \(EASE\) \(europa.eu\)](https://ec.europa.eu/ease/)

William Sleath

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