



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL  
HUMAN RESOURCES AND SECURITY

The Director-General

**To the attention of Mr. Neujeffski**

Email: [ask+request-16045-05011745@asktheeu.org](mailto:ask+request-16045-05011745@asktheeu.org)

**Subject: Your application for access to document – Ref EASE 2025/3435**

Dear Mr. Neujeffski,

I refer to your e-mail dated 27/06/2025 in which you make a request for access to documents, registered on the same date, under the above-mentioned reference number.

You request access to documents related to Support Group for Portugal's EU Structural Funds set up in 2011.

In particular, your request reads as follows:

*Under the right of access to documents in the EU treaties, as developed in Regulation 1049/2001, I am requesting documents which contain the following information related to the Support Group for Portugal's Eu structural Funds set up in 2011 and referenced in the 2nd DG ECFIN communication on the Portuguese Adjustment Programme (see page 7[https://ec.europa.eu/economy\\_finance/publications/occasional\\_paper/2011/pdf/ocp89\\_en.pdf](https://ec.europa.eu/economy_finance/publications/occasional_paper/2011/pdf/ocp89_en.pdf)).*

*1. List of Members of the Support Group for Portugal (including their institutional affiliation,);*

*2. Internal reports, notes, or assessments produced by or submitted to the Support Group;*

*3. Correspondence (including emails and letters) between the Support Group and:*

- Portuguese national or regional authorities (including ministries, agencies, and the Prime Minister's Office),*
- Other DGs involved in EU structural/cohesion funds (e.g., DG REGIO, DG EMPL),*
- The European Central Bank, the IMF, and the European Stability Mechanism (ESM),*

Please note that due to the wide scope of your request, covering also areas falling under the responsibility of other Directorates-General, parts of your request have been attributed to other Directorates-General. You have already received or will receive the replies from the other respective Directorates-General in due course.

This reply concerns only the Directorate-General for Human Resources and Security (DG HR).

Having examined your request under Article 4(1) (b) of Regulation (EC) No 1049/2001 and Regulation (EU) 2018/1725 (hereafter, Data Protection Regulation), I regret to inform you that your request cannot be handled as handling your request is prevented by the Data Protection Regulation.

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 neither do you put forward sufficiently substantiated 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 9(1)(b) of the Data Protection Regulation, your request formulated in relation to an identified, or identifiable, natural person cannot be handled, as the need to obtain access to the personal data resulting from the handling of your request, for a specific 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.

Nevertheless, within the framework of the Code of Good Administrative Behaviour<sup>1</sup>, I would like to provide you with the following information: the Support Group for Portugal (SGPT) was formally established as an organisational entity attached to the Directorate-General for Human Resources and Security in 2011. A total of 12 individuals (*statutory staff and experts*) were officially assigned (not simultaneously) to this organisational entity during the period from 1 November 2011 to 31 December 2014.

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 **via your EASE portal<sup>2</sup> account, or, by mail, to:**

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

or,

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

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<sup>1</sup> Commission Decision (EU) 2024/3083 of 4 December 2024 establishing the Code of Good Administrative Behaviour for Staff of the European Commission in their relations with the public, OJEU, L, 5 December 2024.

<sup>2</sup> <https://www.ec.europa.eu/transparency/documents-request>

Yours sincerely,

Electronically signed

Stephen QUEST

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