



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR ENLARGEMENT AND EASTERN NEIGHBOURHOOD

R – Resources  
The Director

Brussels

Mr Arun DOHLE  
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By email to:  
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**Subject: Your application for access to documents EASE 2025/4417**

Dear Mr Dohle,

I refer to your application for access to documents <sup>(1)</sup> registered under the above-mentioned reference number.

In your confirmatory application for the request EASE 2024/6975 <sup>(2)</sup>, you claimed that:

- *“The Commission provided a registration document only for Commissioner Spidla. No registration sheets were provided for Commissioners Frattini, Rehn, and Barrot, nor was any explanation given as to whether these Commissioners registered the document. We request that the Commission clarify this matter and provide the relevant registration sheets or confirm their absence with a reasoned justification.”*

In their confirmatory decision <sup>(3)</sup>, the Secretariat-General concluded that requesting access to documents only identified at confirmatory stage amounts to submitting a new initial application. Therefore, your request for access to the registration sheets for Commissioners Frattini, Rehn, and Barrot in regard to the document “Le Scandale de l’Interdiction de l’adoption internationale des enfants roumains abandonnés” was registered as a new initial request, processed under reference number EASE 2025/4417.

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<sup>(1)</sup> Ref. Ares(2025)7079854

<sup>(2)</sup> Ref. Ares(2025)4890606

<sup>(3)</sup> Ref. Ares(2025)6921595

The Commission has identified the following documents as falling within the scope of your request:

- Document 1: Adonis, registration fiche, reference CABFRATTINI/2006/A/114
- Document 2: Adonis, registration fiche, reference CABREHN/2005/A/3842
- Document 3: Adonis, registration fiche, reference CABJB/2005/A/8855

Having examined these documents under the provisions of Regulation (EC) No 1049/2001 <sup>(4)</sup>, I have come to the conclusion that partial disclosure can be granted to the documents. Full disclosure is prevented by the exception to the right access laid down in Article 4(1)(b) (protection of the privacy and integrity of the individual) of Regulation (EC) No 1049/2001.

The documents in question contain the following personal data:

- The names of Commission staff members not pertaining to senior management.

Article 9(1)(b) of the Data Protection Regulation <sup>(5)</sup> does not allow the transmission of these personal data, except if you prove that it is necessary to have them 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 application, you do not express any particular interest to have access to these personal data, nor do you put forward any arguments to establish the necessity to have the data transmitted for a specific purpose in the public interest.

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.

### **Means of redress**

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 to the Secretariat-General of the Commission within 15 working days upon receipt of this letter. You can submit it **via your EASE portal account** <sup>(6)</sup>.

Yours sincerely,

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<sup>(4)</sup> Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents, Official Journal L 145 of 31 May 2001, p. 43.

<sup>(5)</sup> 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 of 21 November 2018, p. 39.

<sup>(6)</sup> <https://www.ec.europa.eu/transparency/documents-request>

M<sup>a</sup> Victoria GIL CASADO  
Electronically signed

Enclosures: Document 1-3