

REGISTERED LETTER  
WITH ACKNOWLEDGMENT OF RECEIPT

D 302111 18.05.2026

Mr Max Andersson

[REDACTED]  
Sweden

**Subject:** Your application for public access to documents  
Our reference: **2026-0143** (to be quoted in future correspondence)

Dear Mr Andersson,

On 23 March 2026, the European Parliament registered your application seeking public access to documents related to the declaration made by Ms Alice Teodorescu Măwe, Member of the European Parliament (MEP), regarding the financial support from a private donor related to personal security arrangements.

In particular you requested:

- (a) all documents relating to the review, assessment, or approval by the European Parliament of Ms Alice Teodorescu Măwe (MEP) declaration regarding "ongoing financial support from a private donor related to her personal security arrangements";
- (b) any correspondence between Ms Alice Teodorescu Măwe, MEP, (or her office) and the Parliament's administration regarding this declaration; and
- (c) any guidance or decision by the Advisory Committee on the Conduct of Members concerning whether Members may omit the identity of a donor and the amount received when declaring financial support under the Code of Conduct.

Your application has been assessed in the light of Regulation (EC) No 1049/2001 laying down the terms and conditions for public access to the documents of Parliament, Council and Commission<sup>1</sup> and of Regulation (EU) 2018/1725 on the processing of personal data<sup>2</sup>.

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<sup>1</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, OJ L 145, 31.5.2001, p. 43.

<sup>2</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, 21.11.2018, p. 39.

## **Assessment of your application**

Following an assessment of your application, Parliament has determined that the content sought by your application is covered by the exception relating to the protection of the privacy and the integrity of the individual.

### *The protection of the privacy and the integrity of the individual*

Point (b) of Article 4(1) of Regulation (EC) No 1049/2001 provides that the institutions shall refuse access to a document where disclosure would undermine the protection of the privacy and the integrity of the individual concerned in accordance with Union legislation regarding the protection of personal data, currently Regulation (EU) 2018/1725.

Where an application is made seeking access to personal data, the provisions of Regulation (EU) 2018/1725 must be applied by the European Parliament in their entirety.<sup>3</sup> Thus, personal data may be transmitted to a third party on the basis of Regulation (EC) No 1049/2001 only where that transmission fulfils the conditions laid down in point (b) of Article 9(1) of Regulation (EU) 2018/1725 and constitutes lawful processing in accordance with the requirements of the Regulation.<sup>4</sup>

Pursuant to paragraph 1 of Article 3 of Regulation (EU) 2018/1725, any information relating to an identified or identifiable natural person is considered to be personal data. In line with the relevant case law, this encompasses all kinds of information, provided that it 'relates' to a data subject, in particular where, due to its content, purpose or effect, it is linked to such person.<sup>5</sup>

Your application is directly linked to a natural person identified by name in your application. Therefore, any document identified pursuant to your application would contain personal data falling under the scope of Regulation (EU) 2018/1725, since it would be linked to the individual identified already by your application.

Point (b) of Article 9(1) of Regulation (EU) 2018/1725 provides that personal data shall only be transferred if the recipient establishes that the transfer of the data is necessary for a specific purpose in the public interest. Parliament may only grant access to the requested personal data after it has ascertained that, on the one hand, the transmission of the data at issue is the most appropriate measure, among the other possible measures, to achieve the specific purpose put forward and that, on the other hand, it is proportionate to that purpose.<sup>6</sup>

In your request, you mentioned that the MEP in question has publicly stated that the arrangement concerning her personal security was approved and that the entire process has gone through Parliament. Related to this, you argue that there is a public interest in verifying this claim and understanding what criteria were applied.

The considerations you put forward are of a general nature and do not express a specific purpose in the public interest capable of demonstrating the necessity of the transmission of the personal data requested. According to settled case law, no automatic priority can be conferred on a general objective of transparency over the right to protection of personal data.<sup>7</sup>

<sup>3</sup> Judgments of 16 July 2015, *ClientEarth and PAN Europe v EFSA*, C-615/13 P, ECLI:EU:C:2015:489, paragraph 44 and of 29 June 2010, *Commission v Bavarian Lager*, C-28/08 P, ECLI:EU:C:2010:378, paragraph 63.

<sup>4</sup> Judgment of 8 May 2024, *Izuzquiza et al v Parliament*, T-375/22, ECLI:EU:T:2024:296, paragraph 24 and the case law cited therein.

<sup>5</sup> Judgment of 20 December 2017, *Nowak v Data Protection Commissioner*, C-434/16, ECLI:EU:C:2017:994, paragraphs 34-35.

<sup>6</sup> Judgment of 8 May 2024, *Izuzquiza et al v Parliament*, T-375/22, ECLI:EU:T:2024:296, paragraph 27-28 and the case law cited therein.

<sup>7</sup> Judgment of 25 September 2018, *Psara et al v Parliament*, Cases T-639/15 to T-666/15 and T-94/16, ECLI:EU:T:2018:602, paragraph 91.

Settled case law demands that the recipient must bring forward specific circumstances rather than a general interest to demonstrate a necessity to have the personal data transferred. General references to the public interest, as in this case, cannot be equated with a necessity of transmission of the personal data concerned. This applies regardless whether the access request forms part of a journalistic investigation.<sup>8</sup>

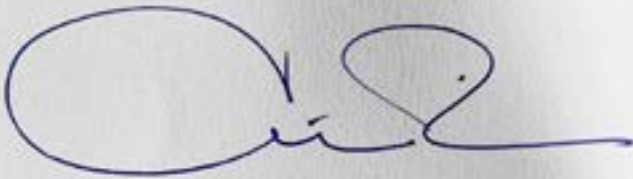
In light of the above, the necessity of transmission of the personal data in question has not been demonstrated, as required by point (b) of Article 9(1) of Regulation (EU) 2018/1725. As the conditions for the transfer of the personal data have not been satisfied, the exception provided for in point (b) of Article 4(1) of Regulation (EC) No 1049/2001 with regard to the protection of privacy and the integrity of the individual applies to the personal data at issue.

### **Conclusion**

In view of the foregoing, Parliament is unable to accede to your application, in accordance with point (b) of Article 4(1) of Regulation (EC) No 1049/2001, read in conjunction with the Union legislation regarding the protection of personal data.

Your attention is drawn to the fact that, pursuant to paragraph 2 of Article 7 of Regulation (EC) No 1049/2001, you are entitled to submit, within 15 working days of the receipt of this letter, a confirmatory application with a reasoned request for the European Parliament's position to be reconsidered.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Alessandro Chiocchetti', with a large, stylized initial 'A'.

Alessandro Chiocchetti

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<sup>8</sup> Ibid paragraph 90.