



Council of the
European Union

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From:	General Secretariat of the Council
To:	Permanent Representatives Committee/Council
No. prev. doc.:	8310/23; 8313/23; 8314/23
Subject:	Public access to documents - Confirmatory application No 07/c/01/23 = Statement

Statement by Finland

Finland emphasizes the importance of striking a balance between access to documents and the protection of privacy and integrity of an individual in official documents. The threshold for the Applicant to justify the need for a legitimate prevailing public interest in the release of personal data, or that such a transfer is necessary for a specific purpose in the public interest should not be set too high. Moreover, in the balancing it is also important to advise the applicant of their duty to justify the need or necessity for the transfer. Finland finds that as it seems that the applicant has not been advised in their duty to justify the request from the perspective of the prerequisites stemming from data protection rules, the balance between the two interests has not been correctly struck in the handling of the request and thus cannot concur with the draft reply.