

Question for written answer E-003830/2026
to the Commission
Rule 144
Barbara Bonte (PfE)

Subject: Access to UBO registers and protection of privacy

In its judgment in the cases WM and Sovim v Luxembourg Business Registers (C-37/20 and C-601/20), the Court of Justice of the European Union ruled that open public access to information on ultimate beneficial owners (UBOs) constitutes a serious breach of the rights to respect for private and family life and to protection of personal data, as protected by Articles 7 and 8 of the Charter.

Directive (EU) 2024/1640 reintroduces access for persons with a ‘legitimate interest’. For certain categories, including journalists and civil-society organisations, such an interest is assumed to apply and a link to the legal entity concerned does not have to be demonstrated. The Directive also stipulates that UBOs will not be informed about which journalist or civil-society organisation has consulted their personal data.

1. How is the Commission guaranteeing that access based on an assumed ‘legitimate interest’, for which no concrete link to the entity concerned has to be demonstrated, complies with the requirements of necessity and proportionality highlighted by the Court in the Sovim judgment?
2. In the Commission’s view, how is the right of UBOs to the protection of their personal data guaranteed if they cannot find out which journalist or civil-society organisation has consulted their data?
3. How can a UBO verify retrospectively whether data was actually consulted within the framework of a ‘legitimate interest’?

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