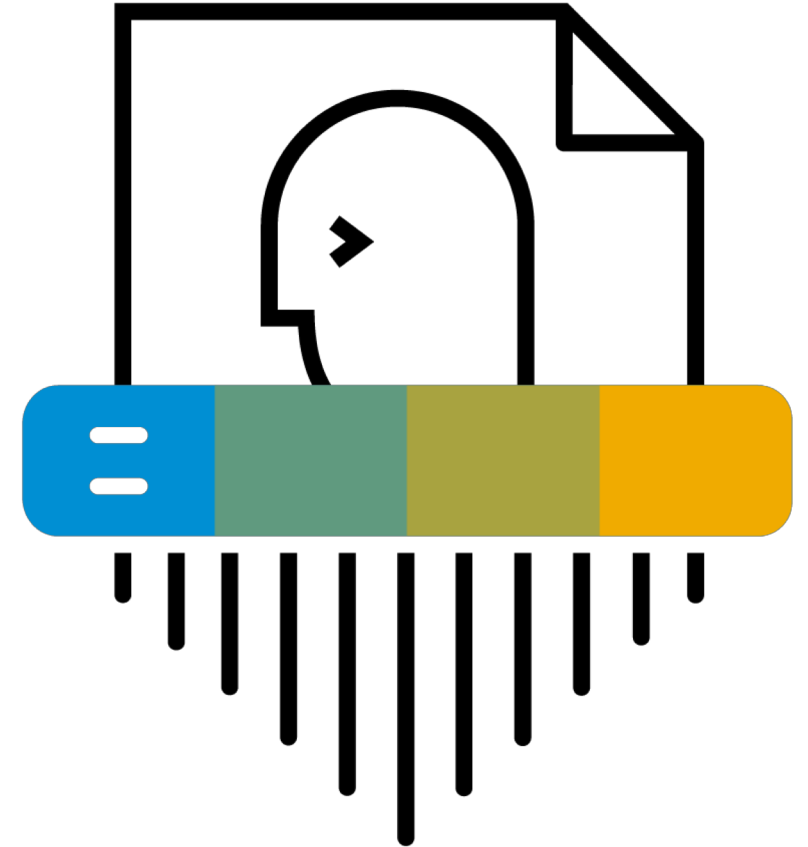


Blocking and Deleting Personal Data in **SAP S/4HANA and SAP Business Suite**

Volker Lehnert, SAP

PUBLIC



Disclaimer

SAP does not provide legal advice. The following presentation is limited to explaining and contextualizing technical features designed to help our customers comply with privacy requirements.

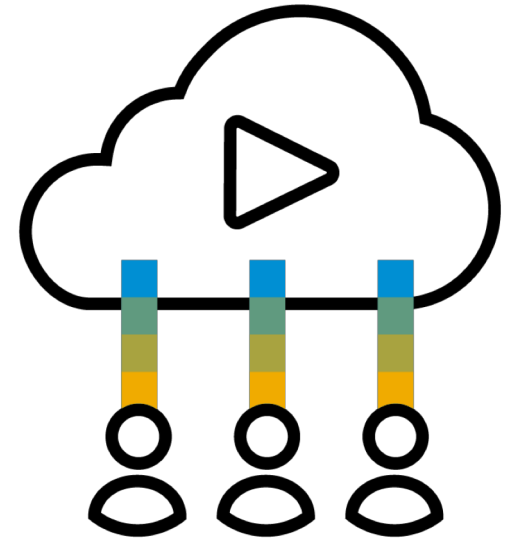
In order to understand the solution logic, the speaker presents his/her assumptions about the legal context, which generally corresponds to the assumptions that are also presented in "Data Protection with SAP", 2017, Lehnert / Luther / Pluder / Christoph and other publications.

The speaker expressly states that he/she is not a lawyer and that these statements are in no case to be understood as legal council.

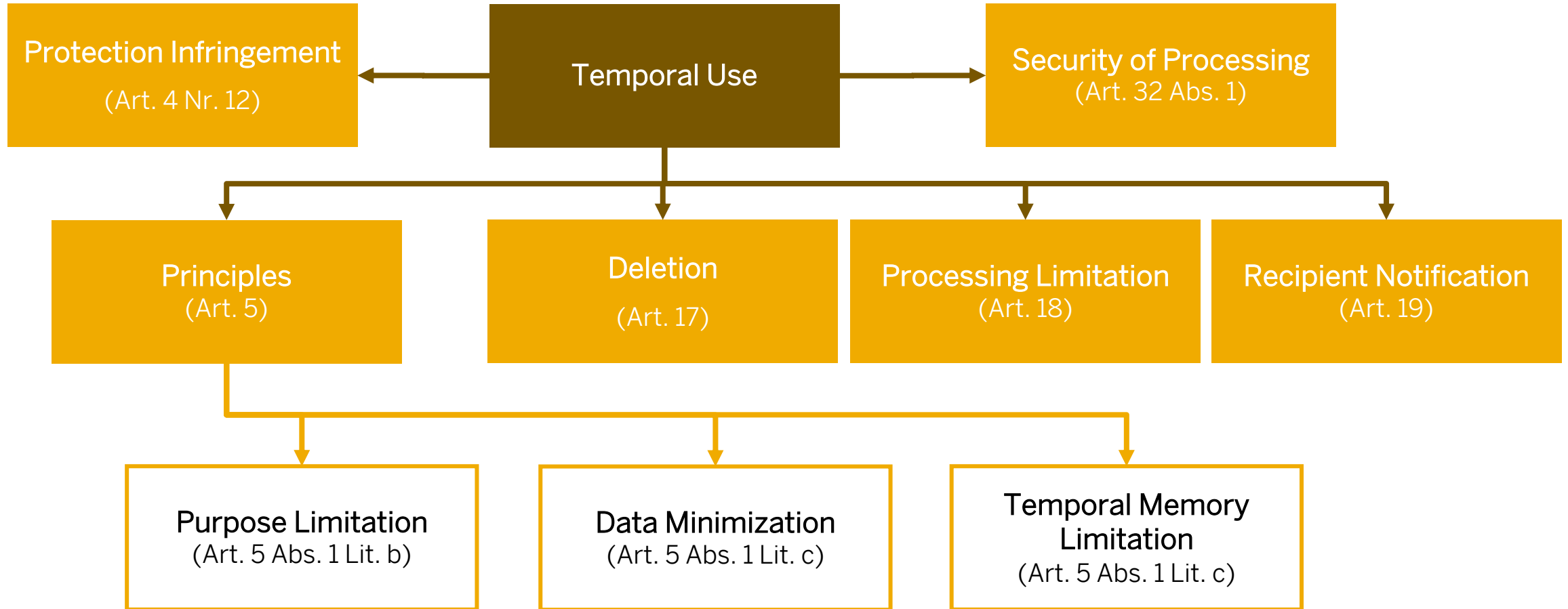
Agenda

1. Deleting? Blocking? **Context**
2. Deleting? Blocking? **Abstraction**
3. Deleting & Blocking **Technical Complexity**
4. Deleting & Blocking ... **in SAP S/4HANA**
5. And **really?**
6. Further resources **relating to DSGVO & SAP**

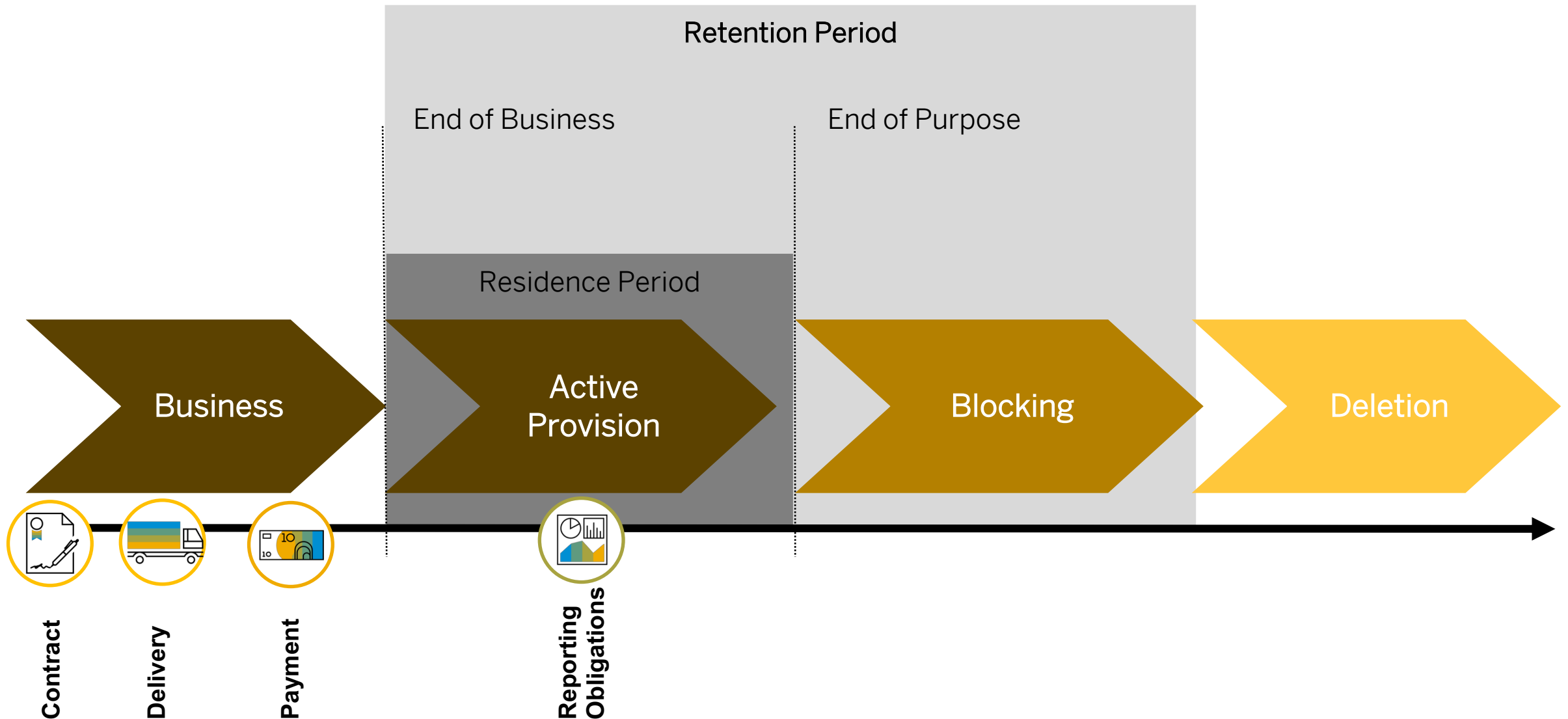
1. Deleting? Blocking? Context



Context Blocking and Deleting DSGVO



Personal Data Lifecycle



Data on Carla Customer

Carla Customer

Regenbogenweg 1, 39761 Wolkenkuckucksheim

Communications Data

+49 610 9607207, Portal Account: KarKun

Payment Details

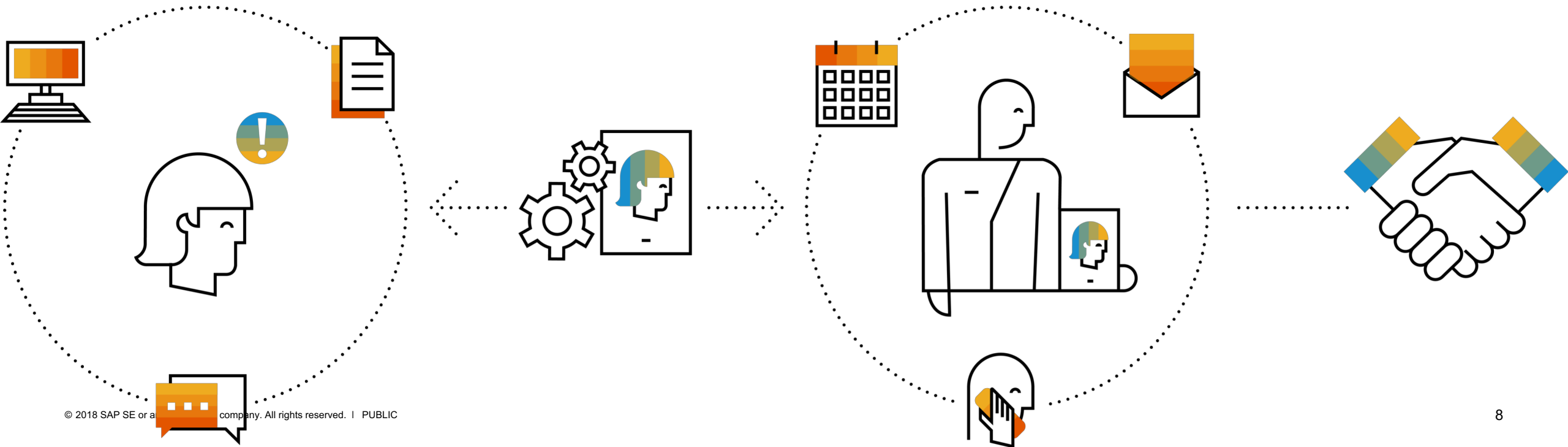
Allkreditbank. IBAN: DE1250090317064848989

Employment Contract Working Student / BA (04.2011 – 03.2014)

Service Contract Targeted marketing (12.2015)

Goods Purchased:

- aPhone + Maintenance Contract (3.2015)
- The Divine Comedy – Alighieri, D: (1.2017)



Nature of Business Relationship, Processing Purpose?

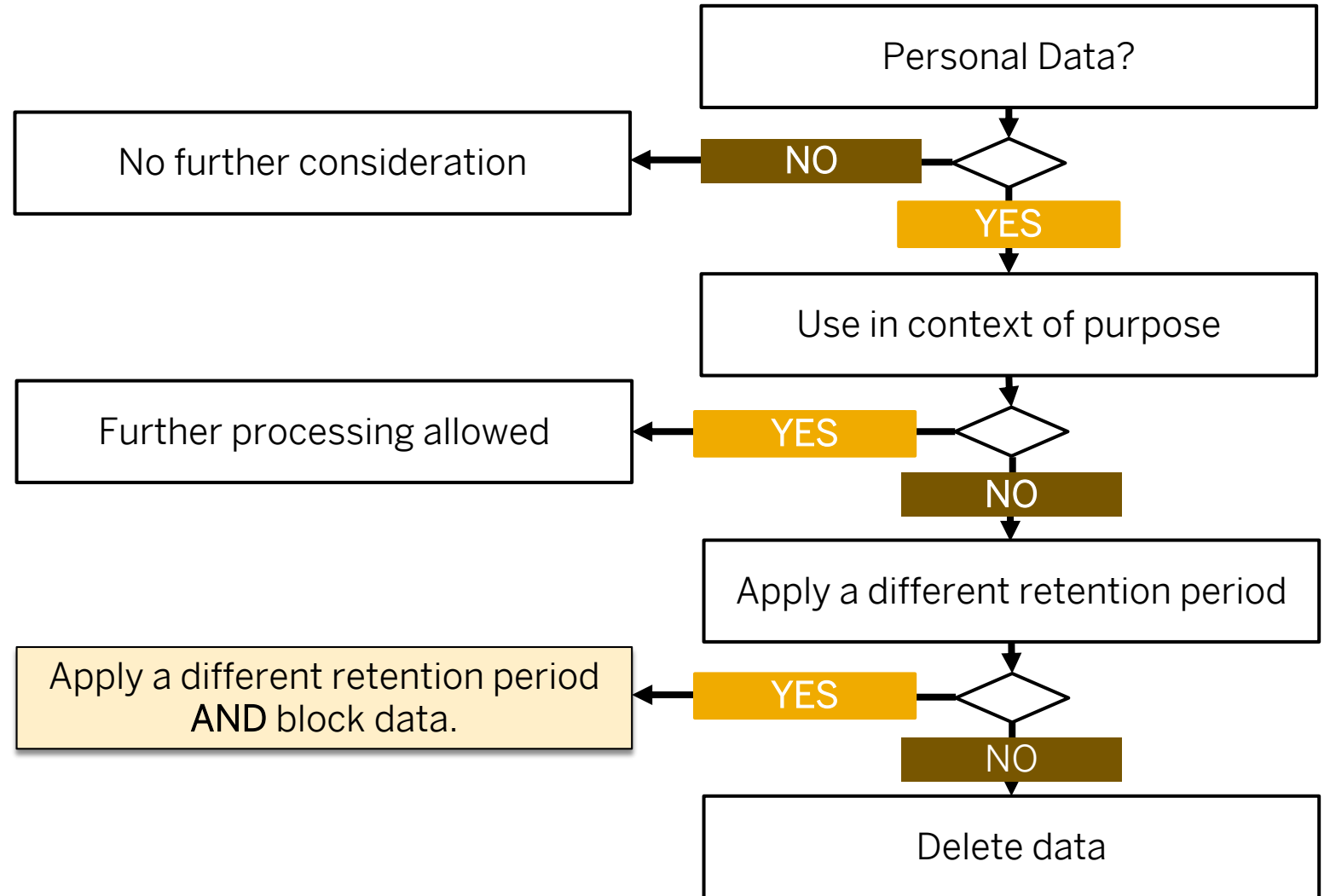
- Obviously, there are very different business relationships with Carla Customer, which partly necessitate other residence needs and retention periods.
- It may be useful to consider the different business relationships as different purposes.
- In addition to the legal economic assessment of whether these are different purposes, it must also be assessed whether different additional legal bases could be applicable
- In many cases, master data is data whose purpose depends on other purposes.
- Marketing data may be data, that possibly are justified by another justifiable fact, such as consent to the basis of agreement.



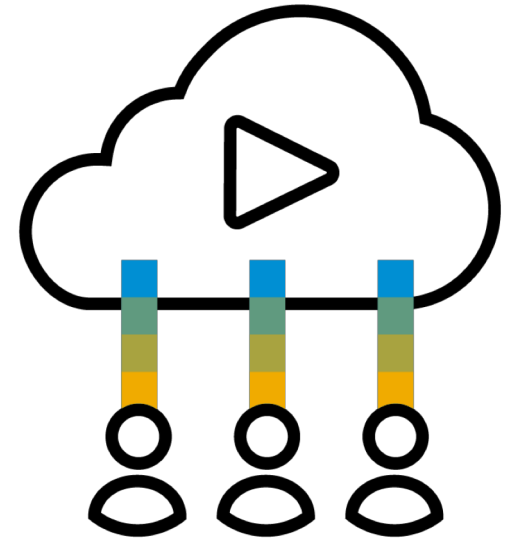
Assumptions Regarding Provision and Storage

	Purpose	Active Provision	Blocked Storage
Master Data	Dependent on other purposes	With related data	Until the last affiliated A-deadline ends
Payment Data	Dependent on other purposes	With related data	Until the last affiliated A-deadline for payment data ends
Communications Data	Dependent on other purposes	With related data	De Facto with master data
Marketing	Marketing	Until consent is revoked or not renewed after x years	None
Data on a Phone purchase agreement and maintenance contract	Settlement purchase agreement Settlement maintenance contract	Until the end of maintenance claims	Until the last affiliated A-deadline ends
Data on aPhone purchase agreement „The Divine Comedy “	Settlement purchase agreement	During purchase agreement settlement / possibly reporting purposes	Until the last affiliated A-deadline ends
Data on Service Contract	Settlement service contract	During service contract settlement / possibly reporting purposes	Until the last affiliated A-deadline ends
Data on employment contract	Settlement employment relationship	During employment relationship and end settlement	Attention: deadlines regarding pensions, insurance companies and possibly health and safety

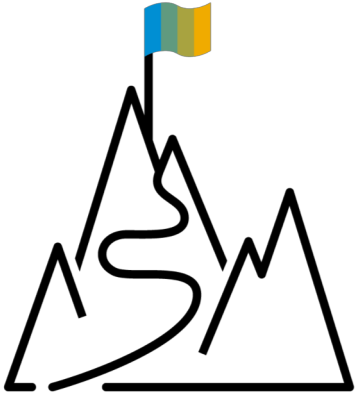
When to Block and When to Delete



2. Deleting & Blocking **Abstraction**

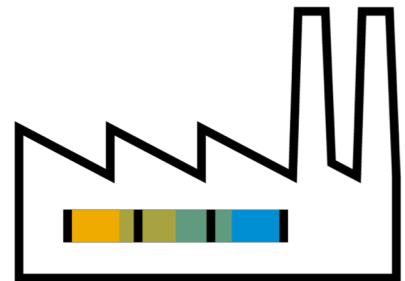


Assumptions to Purpose (I)

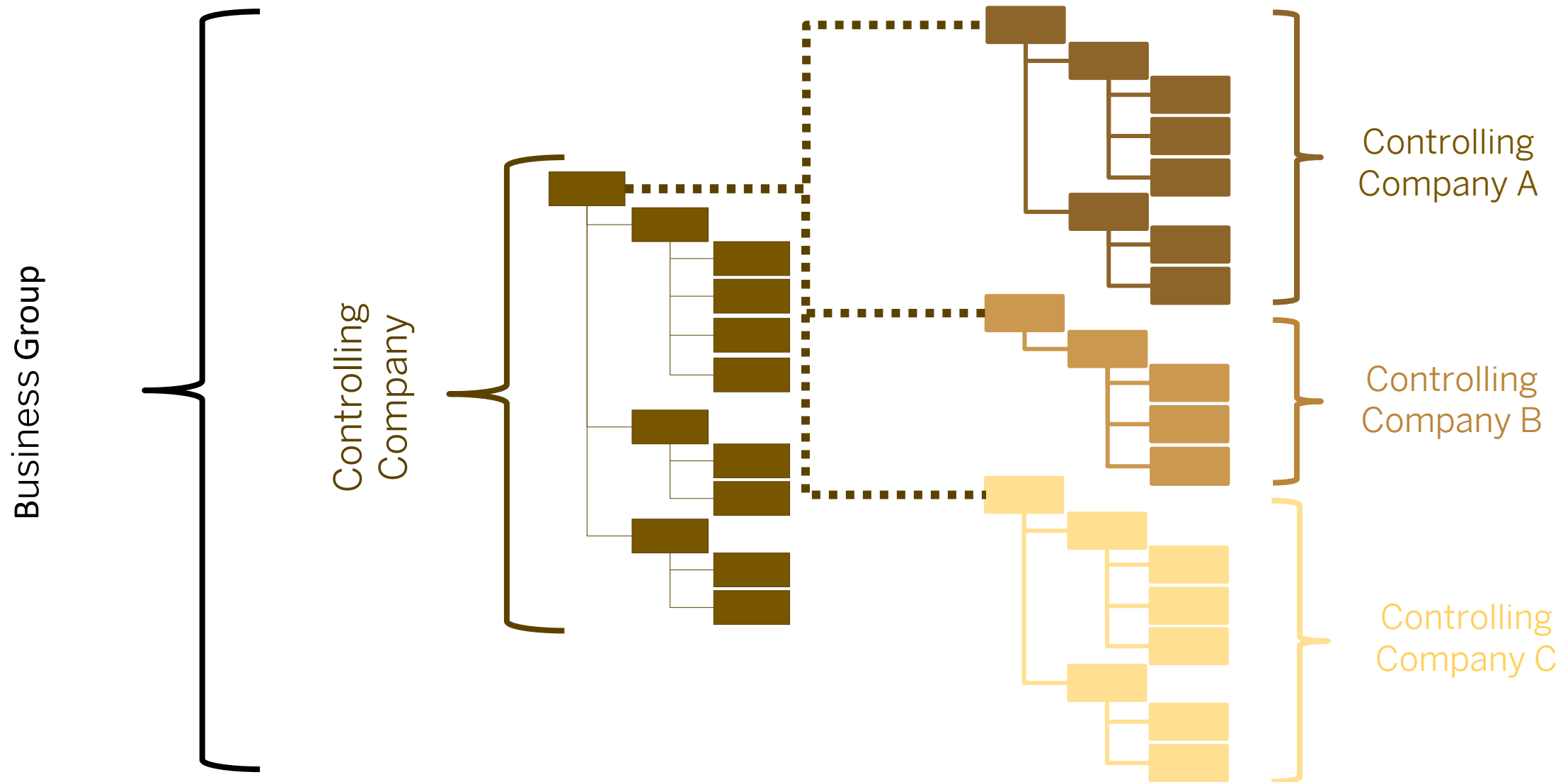


The purpose is determined by the person responsible.

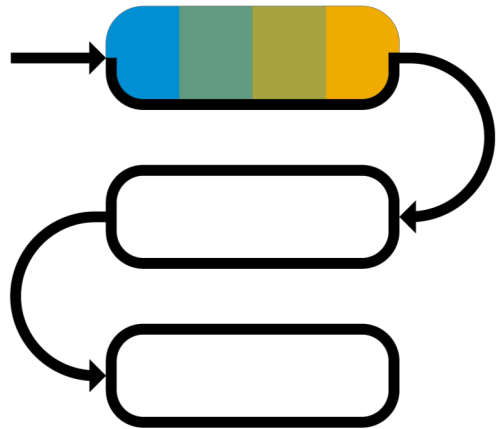
In the context of ERP Software, the responsible person is frequently the individual company with legal capacity / accounting (company unit).



Business within a Business Group



Assumptions to Purpose (II)



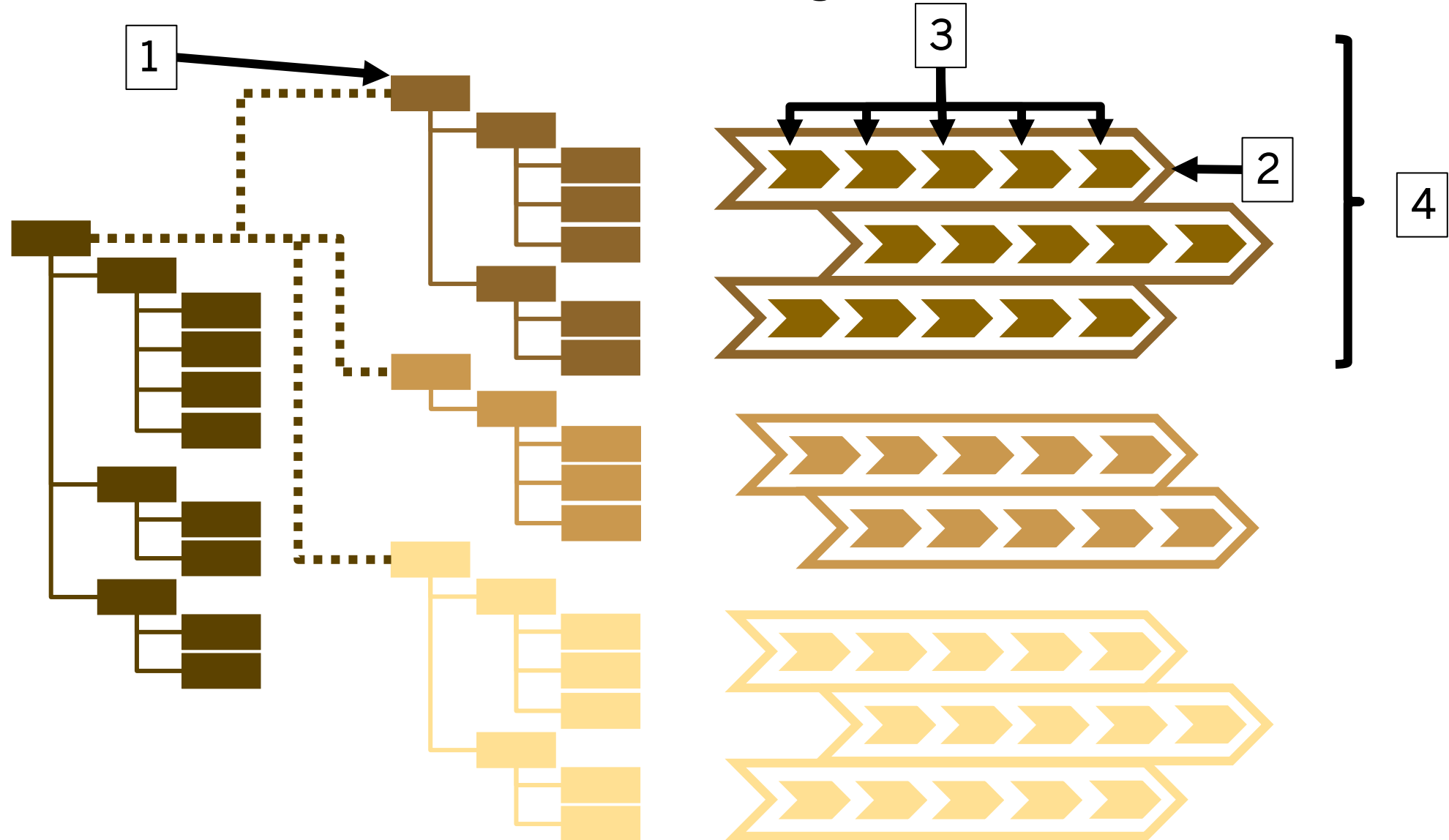
The term „purpose“ is not defined

The processing purpose includes a comparable set of software-aided process steps for which the allegedly identical legal bases can be cited.

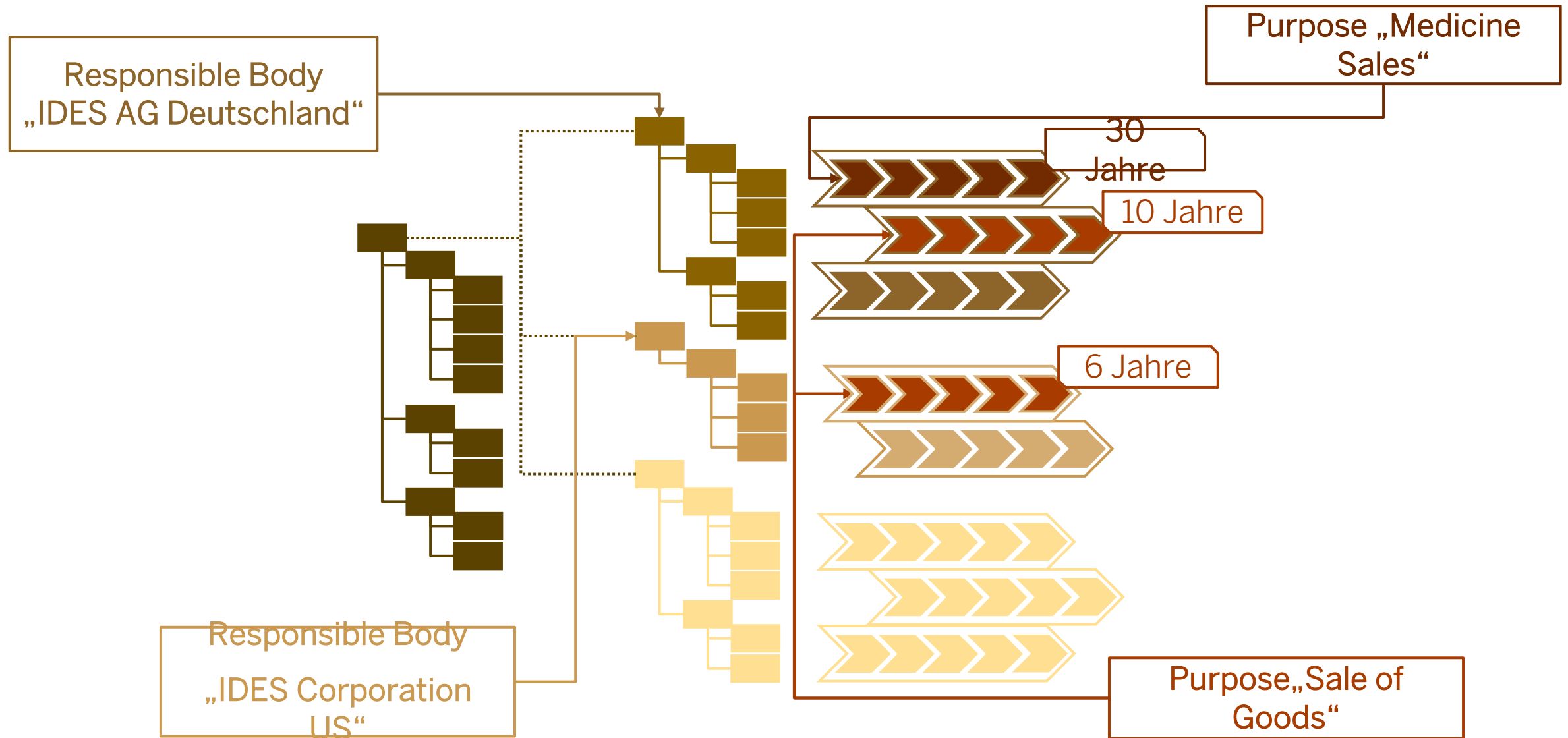
In our experience, the comparability of retention periods in a process is a necessary stipulation.

In any case, it is obvious that not only the responsible person (line organizational attribute) but also process attributes (process organizational attribute) are required to illustrate the purpose.

Purpose: Illustration of Line and Process Organizational Attributes I



Purpose: Illustration of Line and Process Organizational Attributes I



Assumptions to Purpose (III)

Hypothetically, we can assume a minimum of three to four different purposes.

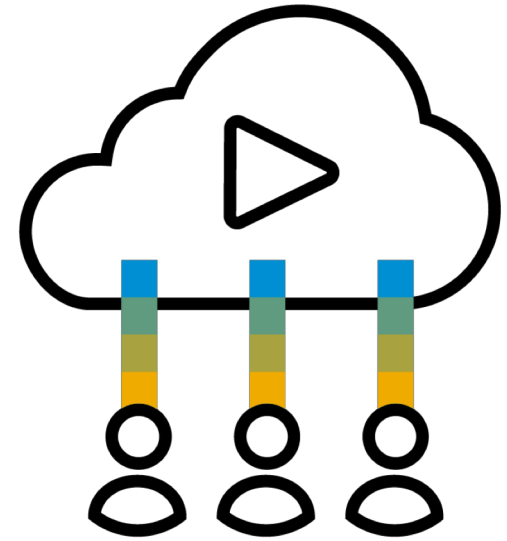
- Employment Contract Working Student / BA
- Service Contract

Goods Purchased:

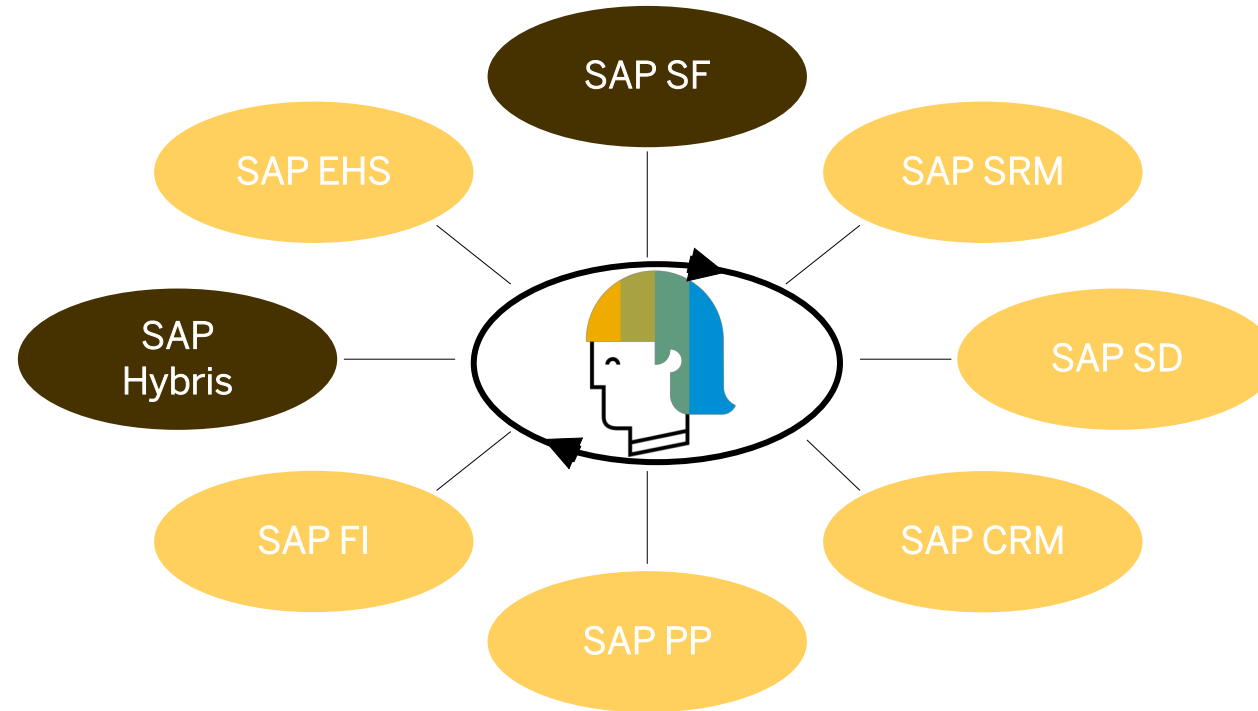
- aPhone + Maintenance Contract (3.2015)
- The Divine Comedy– Alighieri, D: (1.2017)



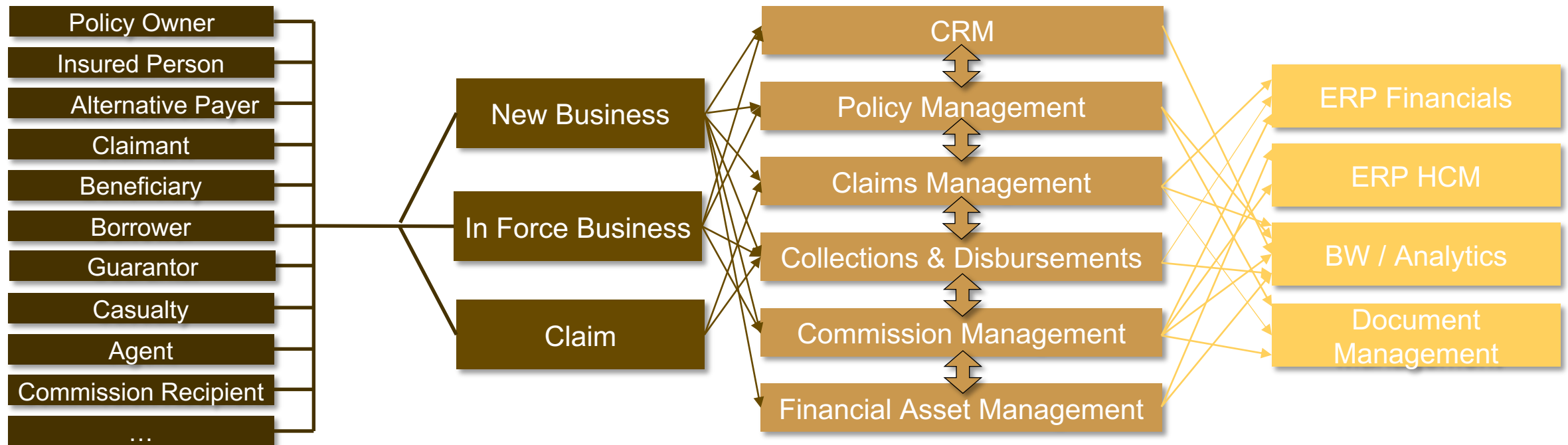
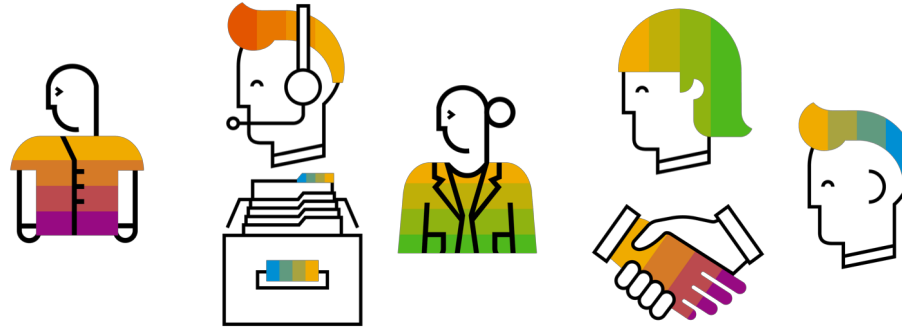
3. Deleting & Blocking **Technical Complexity**



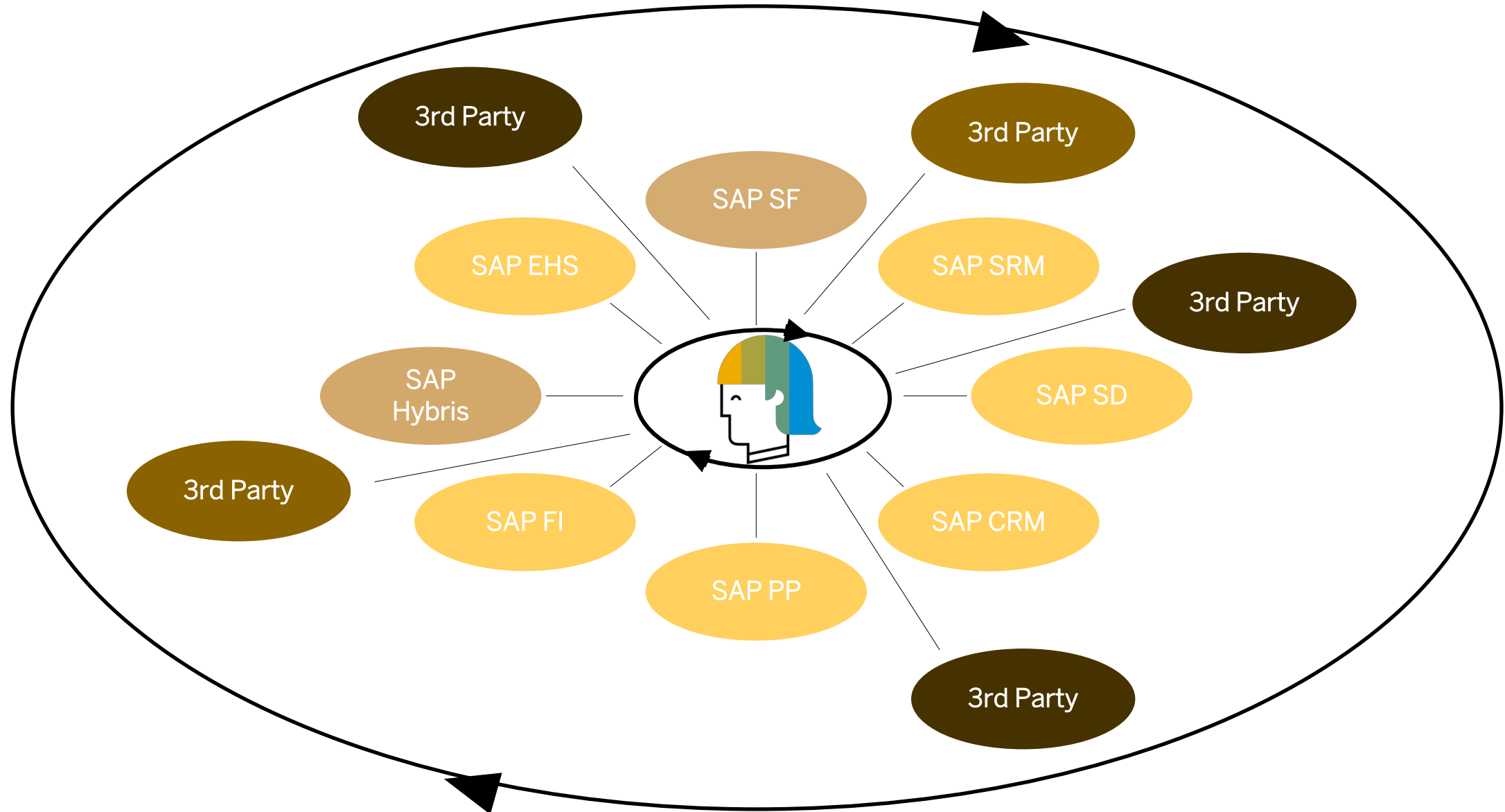
The „Total Interdependence“ of Integration I



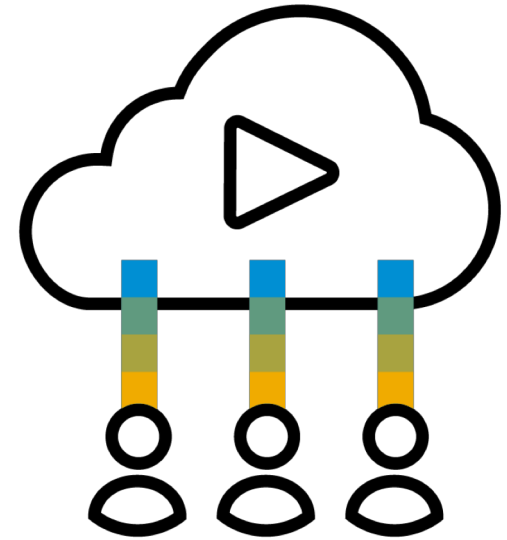
SAP Insurance Solution Scope



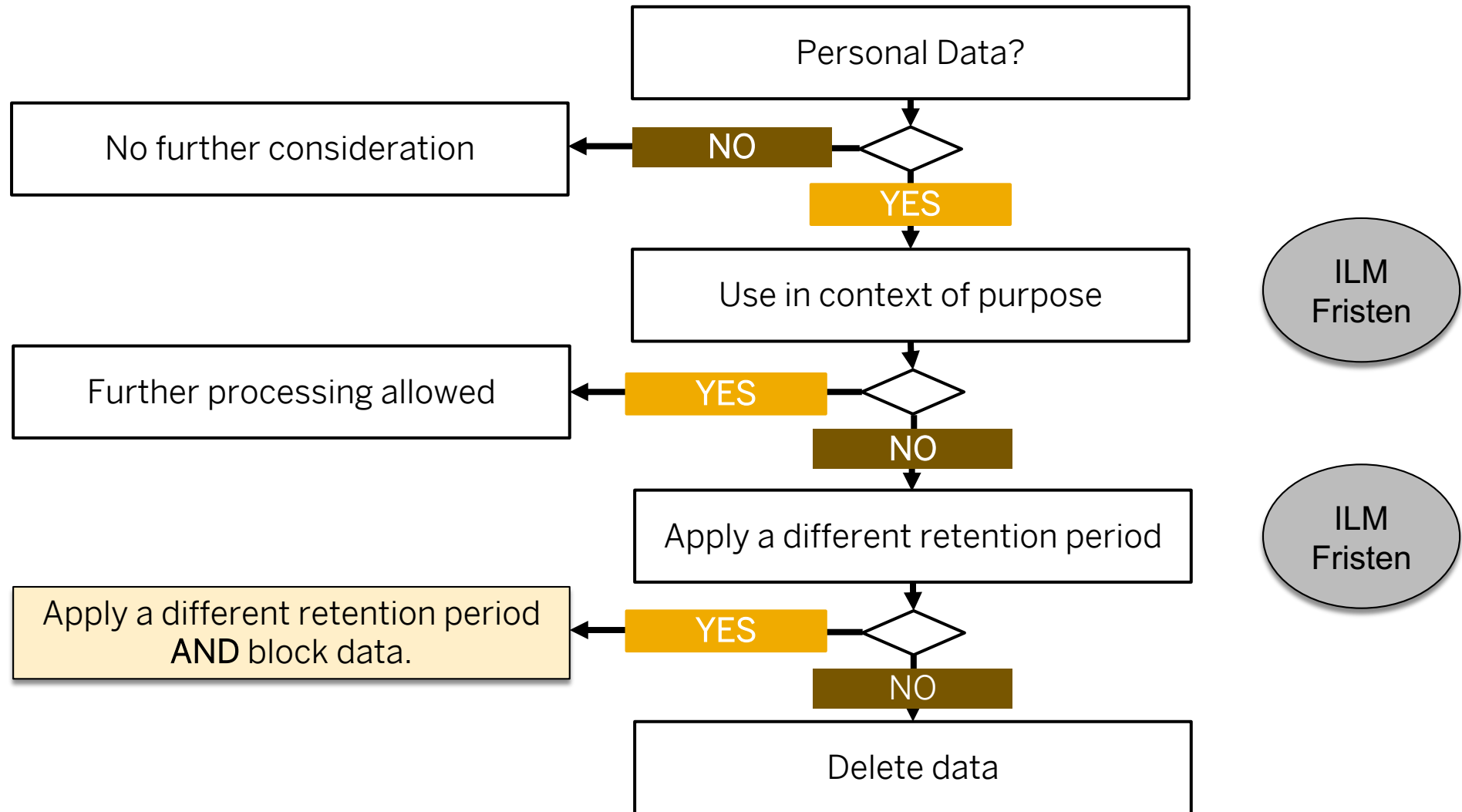
The „Total Interdependence“ of Integration II



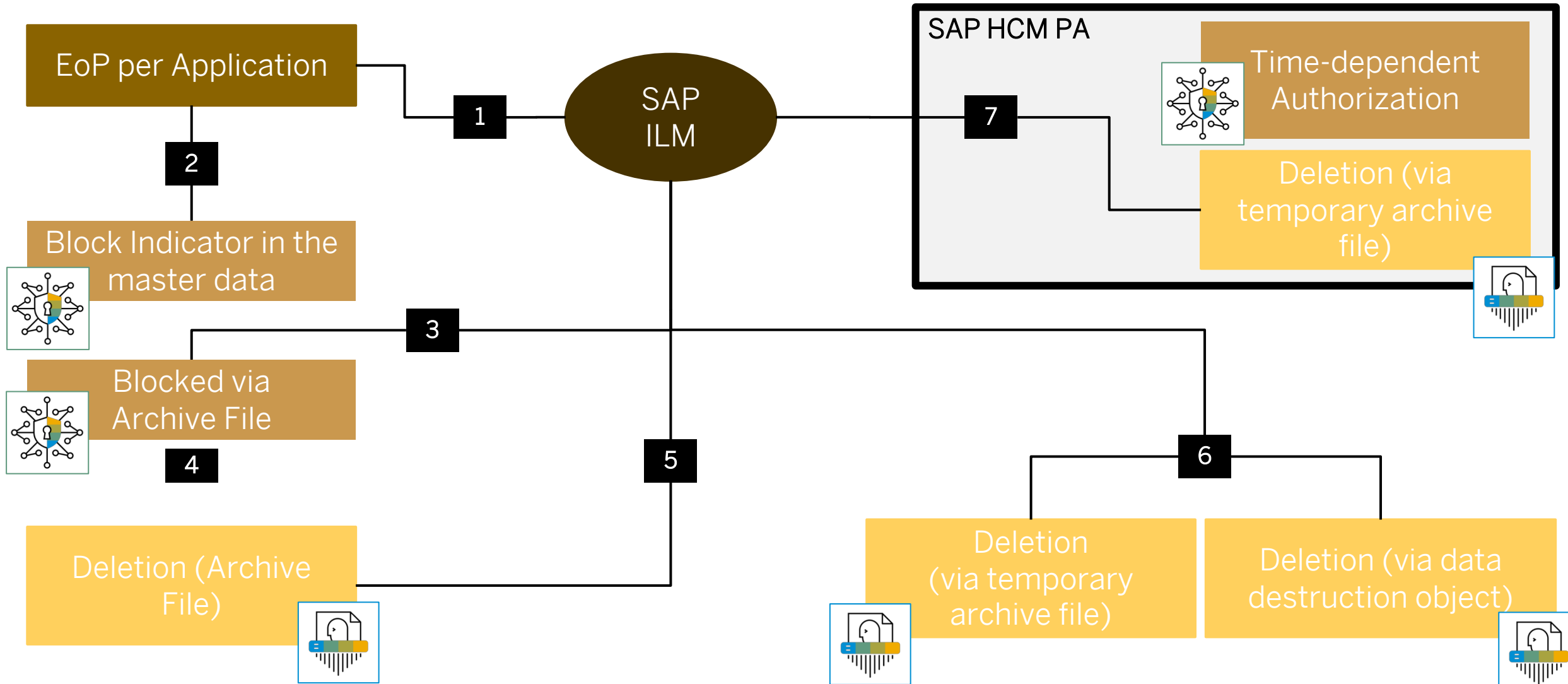
4. Deleting & Blocking ... in SAP S/4HANA



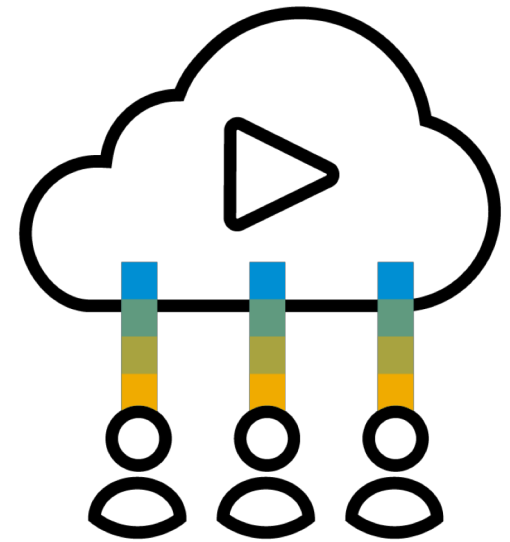
When to Block and When to Delete



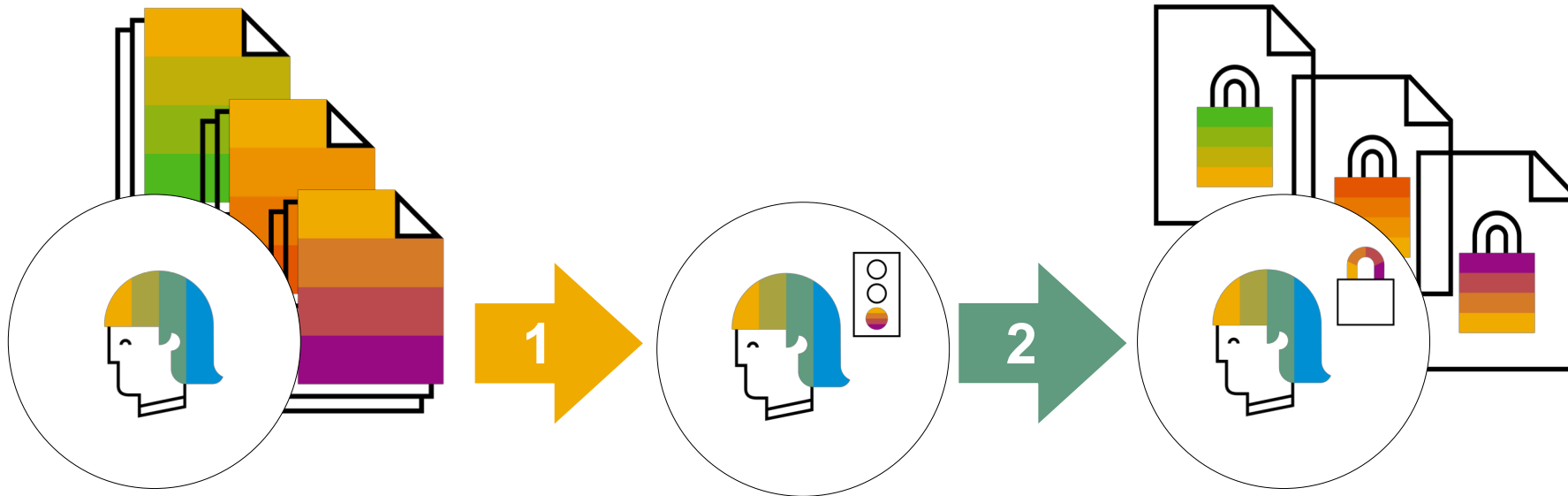
Blocking and Deleting with SAP ILM



Really?



Blocking via Blocking Indicators



Blocking a Customer or Vendor

To block a customer or vendor, use transaction CVP_PRE_EOP.

The screenshot displays the 'Block Customer and Vendor Master Data' transaction. Yellow arrows highlight the following elements:

- Data To Be Processed:** A dropdown menu set to 'AL Check on all Data Levels'.
- Customer Master Data:** A tab with a green checkmark icon, selected over the 'Vendor Master Data' tab.
- Customer Selection:** A table with columns for 'Customer', 'Company Code', and 'Contact Person'. The first row contains 'bit665_00b'. To the right, a 'to' field is highlighted with a red box and contains an empty input field.
- End of Purpose Check Execution Mode:** Two radio buttons are present. The 'Overall Check (Remote) w/ Setting Compl. Flag' option is selected and highlighted with a red box.
- Processing Options:** Two radio buttons are present. The 'Production Mode' option is selected.
- Detail Log:** A dropdown menu set to 'X Complete', highlighted with a red box.
- Log Output:** A dropdown menu set to 'List'.

Display Blocked Customer

Customer Display: Initial Screen

Customer  BIT665_BB

Company code

Sales area

Sales Organization

Distribution Channel

Division

All sales areas... Customer's sales areas...

Error

 No authorization for displaying the general data for this account

Display Invoice Document

Display Document: Initial Screen

Document List First Item Editing Options

Keys for Entry View

Document Number 1800000248
Company Code 1000
Fiscal Year 2018



Display Document: Data Entry View

Display Currency General Ledger View

Data Entry View

Document Number 1800000248 Company Code 1000 Fiscal Year 2018
Document Date 23.07.2018 Posting Date 23.07.2018 Period 7
Reference Cross-Comp.No.
Currency EUR Texts exist ☐ Ledger Group

Missing Authorizations

Missing authorizations for following line item(s):
10001800000248-001;

Display remaining items?

Yes

No

Display Document: Data Entry View

Display Currency General Ledger View

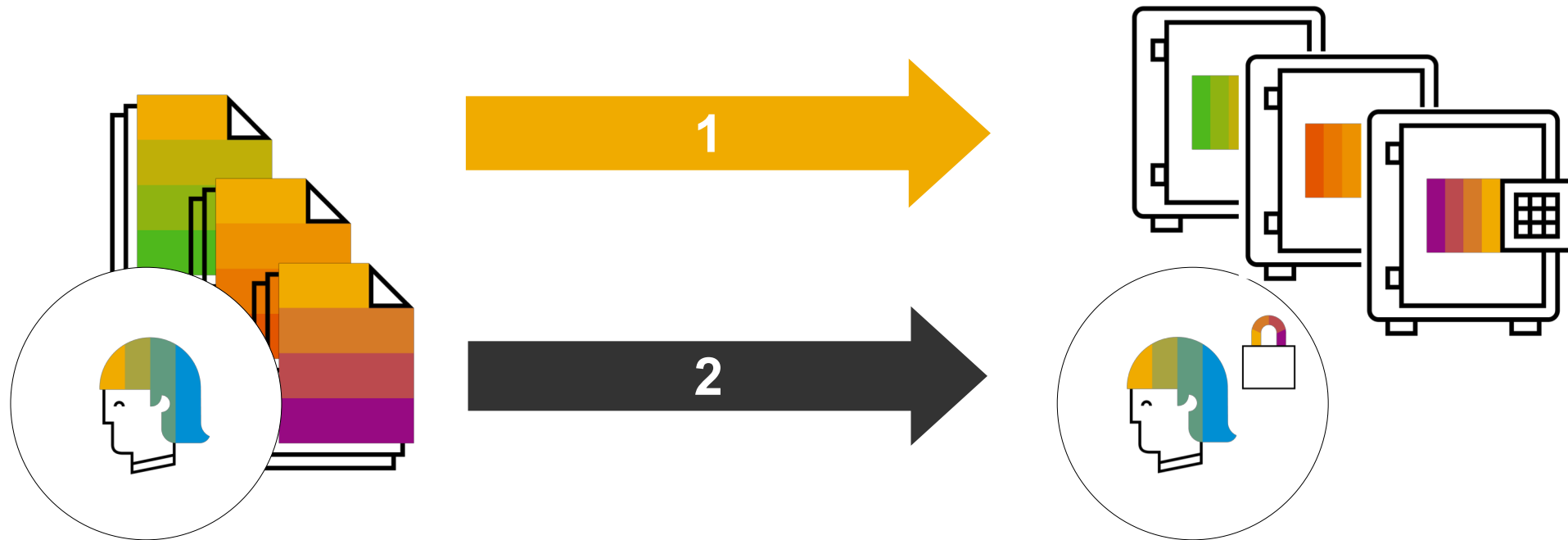
Data Entry View

Document Number 1800000248 Company Code 1000 Fiscal Year 2018
Document Date 23.07.2018 Posting Date 23.07.2018 Period 7
Reference Cross-Comp.No.
Currency EUR Texts exist ☐ Ledger Group

Co...	Itm	PK	S	Account	Description	Amount	Curr.	Tx
1000	2	50		62110	Secured Bank Loans,	1.313,00-	EUR	



Block via Archiving



In SAP S/4HANA, the archiving of transaction data is the method of choice.

Display of Archived Sales Documents

The diagram illustrates the process of displaying archived sales documents in SAP, showing the progression from a simple input field to a full system error message.

Left Panel (Input Field): A small window titled "Display Outbound Delivery" contains a toolbar with icons for search, save, delete, print, and other functions. Below the toolbar, the text "Outbound Delivery" is followed by a text input field containing the value "80012231".

Right Panel (Full System View): A larger window titled "Display Outbound Delivery" shows the same toolbar and input field. Below the input field, a message is displayed: "Data belonging to this data object is blocked". A yellow arrow points from the input field in the left panel to the input field in the right panel.

Performance Assistant (Right Panel): A separate window titled "Performance Assistant" is open, displaying a detailed error message. The message text is as follows:

- Data belonging to this data object is blocked**
- Message no. BA344
- Diagnosis**
- You want to display archived data. The data of this data object can include personal data and is blocked.
- System Response**
- To protect personal data, the system does not display the archived data relating to this data object.

A yellow arrow points from the bottom of the right panel to the bottom of the left panel.

Display of Archived Accounting Documents

Display Document: Initial Screen

 Document List  First Item  Editing Options

Keys for Entry View	
Document Number	100010001
Company Code	1000
Fiscal Year	1999



Display Document: Initial Screen

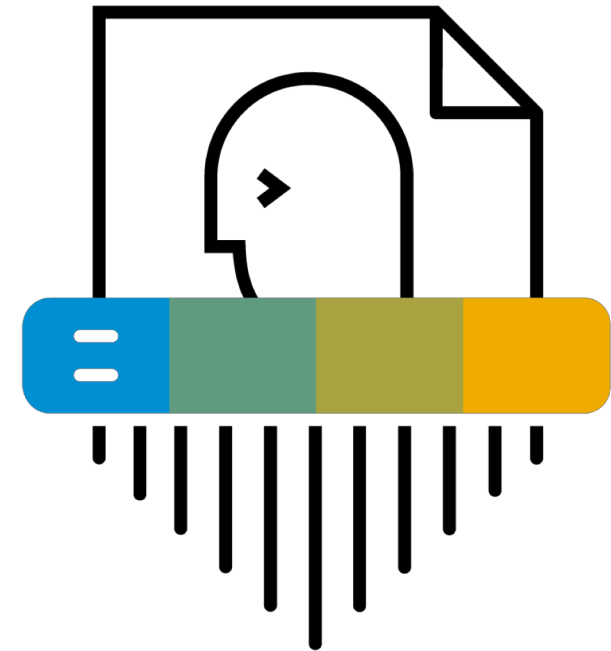
 Document List  First Item  Editing Options

Keys for Entry View	
Document Number	100010001
Company Code	1000
Fiscal Year	1999

 Document 100010001 1000 does not exist in fiscal year 1999



Data Deletion



Data Destruction for Archived Data

Data Destruction

Type of Data to Be Destroyed

☒ Archive Files (ADK) 

☐ Attachments and Print Lists 

☐ Data from the Database

Restrictions

ILM Object

SAP System to

Client to

 >> | ILM_DESTRUCTION | zmetdc00 |

Transaction
ILM_DESTRUCTION – DATA DESTRUCTION

Data Destruction

Job Overview | Logs | Destruction Runs

Expired Resources

Expired Resources	Expiration Date	Mand. Distr...
In1		
q58		
003		
sn		
flight_bookings		
mm_ekko		
0001		
20100212		
003392		
003392-012mm_ekko.adk	16.03.2010	31.12.9999
003392-013mm_ekko.adk	16.03.2010	31.12.9999
003392-014mm_ekko.adk	16.03.2010	31.12.9999
ad		
lo_chvw		
mm_ekko		
mk		
0001		
20100203		
de		
20051231		
003390		
003390-001mm_	12.02.2010	31.12.2007
r300		
0001		
20051231		
003436		
003436-001mm_ekko.ac	16.02.2010	31.12.9999

Creation of Destruction Worklist

URI of a Resource

- /q58/003/sn/mm_ekko/20100212/003392/003392-014mm_ekko.adk
- /q58/003/sn/mm_ekko/20100212/003392/003392-013mm_ekko.adk
- /q58/003/sn/mm_ekko/20100212/003392/003392-012mm_ekko.adk

Destruction Worklists

User Name	Date	Time	Text	Description of a Destruction
CAMPBELLH	13.04.2010	15:37:19		test 2
CAMPBELLH	13.04.2010	15:38:05		RKT Snapshot Destruction
CAMPBELLH	13.04.2010	15:38:29		Test
CAMPBELLH	13.04.2010	15:38:51		Destruction Test
CAMPBELLH	13.04.2010	15:39:10		Test
CAMPBELLH	13.04.2010	15:39:28		Test
CAMPBELLH	13.04.2010	15:39:40		Test
CAMPBELLH	13.04.2010	15:40:32		Test
CAMPBELLH	13.04.2010	15:40:46		Test
CAMPBELLH	13.04.2010	15:41:05		Test

Q58 (1) 003 | uxai1q58 | INS

Data Destruction of Data in the Databank via Data Destruction Object (Tr. ILM_DESTRUCTION)

Datenvernichtung



Typ der zu vernichtenden Daten

☐ Archivdateien (ADK)
☐ Anlagen und Drucklisten
☒ Daten aus der Datenbank

Einschränkungen

ILM-Objekt



Datenvernichtung aus der Datenbank: Einstieg

JOB Jobübersicht Protokolle

Datenvernichtungsobjekt [Beispielobjekt für die Datenvernichtung]

Aktionen

 Vernichten
 Verwaltung



Variantenpflege: Report BC_SFLIGHT_DES, Variante IW_1

 Attribute

Flüge

Fluggesellschaft	1	bis		
Verbindungs-Nummer		bis		
Datum des Fluges		bis		

Einschränkungen

Flugzeugtyp		bis		
-------------	-------------------------------	-----	-------------------------------	---

Ablaufsteuerung

☒ Testmodus
☐ Produktivmodus

Detailprotokoll

Protokollausgabe

Beschreibung

Transaction
ILM_DESTRUCTION – DATA DESTRUCTION

Data Destruction of Data in the Databank (TR SARA) via ILM „Data Destruction“ of an Archived Object

Archive Administration: Initial Screen

Archiving Object:

Actions

- Write
- Delete
- Management

SAP >> | SARA

Edit Variants: Report FI_DOCUMNT_WRI, Variant IW_2

Variant Attributes

Financial Accounting Documents

Company Codes	1000	to		
Document Numbers	121354545	to		
Fiscal Year/Period	1999	To	1999	99
Document type		to		

Selections

Min.No.of Days in the System	
Key date	05.05.2017

ILM Actions

- ☐ Archiving
- ☐ Snapshot
- ☒ Data Destruction

Processing Options

- ☒ Test Mode
- ☐ Production Mode

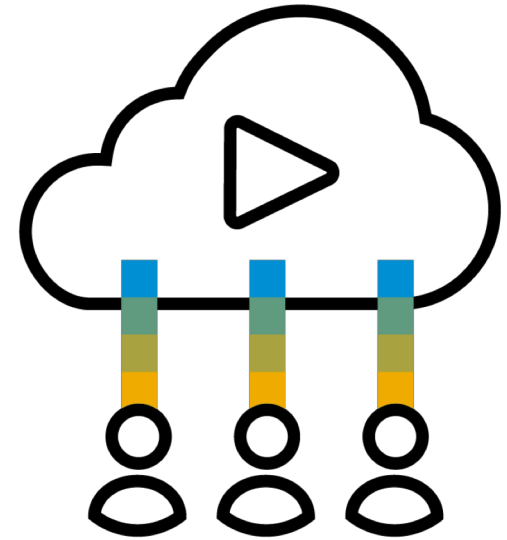
☒ Delete with Test Variant

Detail Log: No Detail Log

Log Output: List

Archiving Session Note:

6. Further resources relating to DSGVO & SAP



Further information sources Data Protection and Privacy:

EU General Data Protection Regulation (GDPR)

Personal data is everywhere. The European Union (EU) passed the GDPR to give individuals more control over their. GDPR imposes more rules about processing that data, and comes with powerful enforcement.



Getting ready for GDPR

May 25th is just around the corner. Learn from Marie-Luise Wagener, VP Global GRC, how ready and prepared SAP is for GDPR along with some best practices your company can leverage.



SAP's approach to GDPR

Do you have questions about GDPR and SAP's approach? Then watch this interview with Volker Lehnert, Senior Director Data Protection S/4HANA to gain his expert insights on protecting personal data.

How SAP is implementing the requirements of the General Data Protection Regulation (GDPR) to best support its customers

Source:
[Cloud Trust Center](#)

Data Protection and Privacy at SAP



Getting Ready for May 25, 2018

Part 2: Product and Services Compliance

How SAP is implementing the requirements of the General Data Protection Regulation (GDPR) in its products and services to best support customers

Getting ready for General Data Protection Regulation with Product and Services Compliance Part 1 and 2

Source:
[Part 1: Getting Ready](#)

[Part 2: Product and Services Compliance](#)



Will be available in English in September 2018

Datenschutz mit SAP, Lehnert/Luther/Pluder/Christoph

Source:
https://www.rheinwerk-verlag.de/datenschutz-mit-sap_4524/

Datenschutzanforderungen und ihre Unterstützung in HR-Systemen am Beispiel SAP ERP HCM (Lehnert/Dopfer-Hirth)

Source:
[HMD Praxis der Wirtschaftsinformatik.](#)

Vereinfachtes Sperren und Löschen personenbezogener Daten in der SAP Business Suite Lehnert/Pluder

Source:
www.datenschutz-berater.de Nr. 10/2016

SAP Integrated Report 2016 – Governance – Security, Privacy, and Data Protection

Source:
[Integrated Report](#)

Thank you.

Contact information:

Volker Lehnert
Senior Director Data Protection S/4HANA

volker.lehnert@sap.com