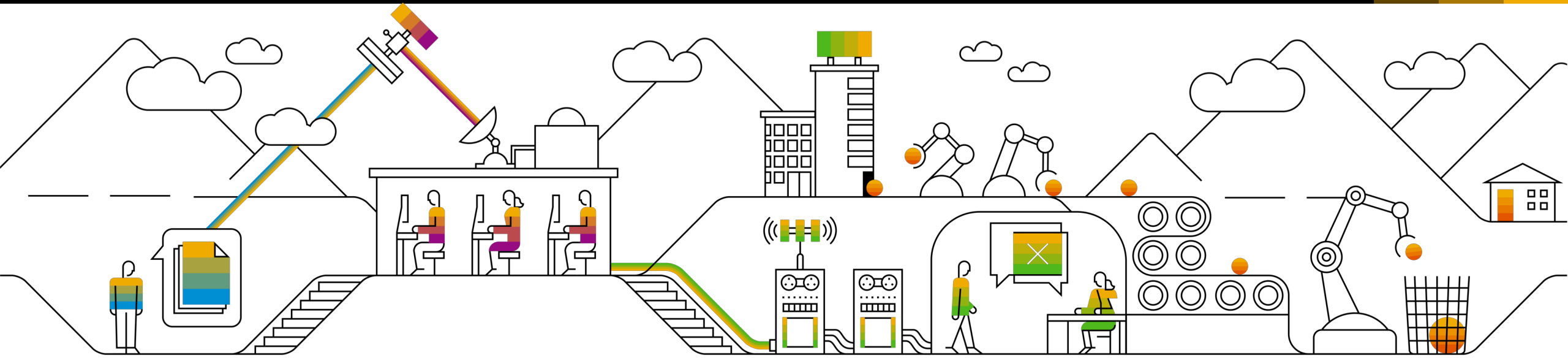
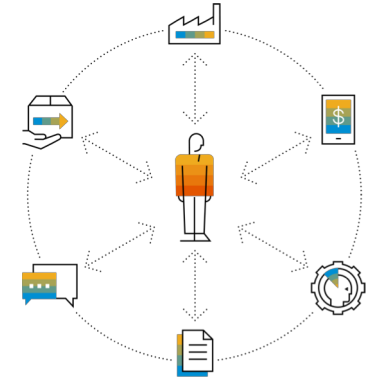
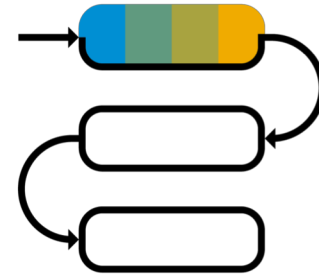
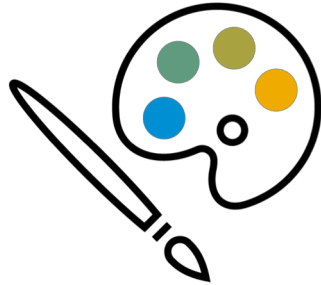
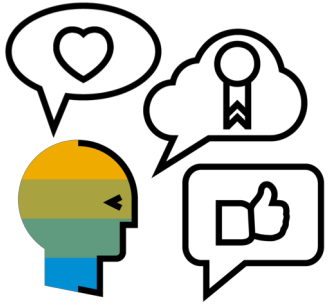




SAP cloud solutions an overview on DPP features

Volker Lehnert, SAP SE

View of the Data Protection Officer



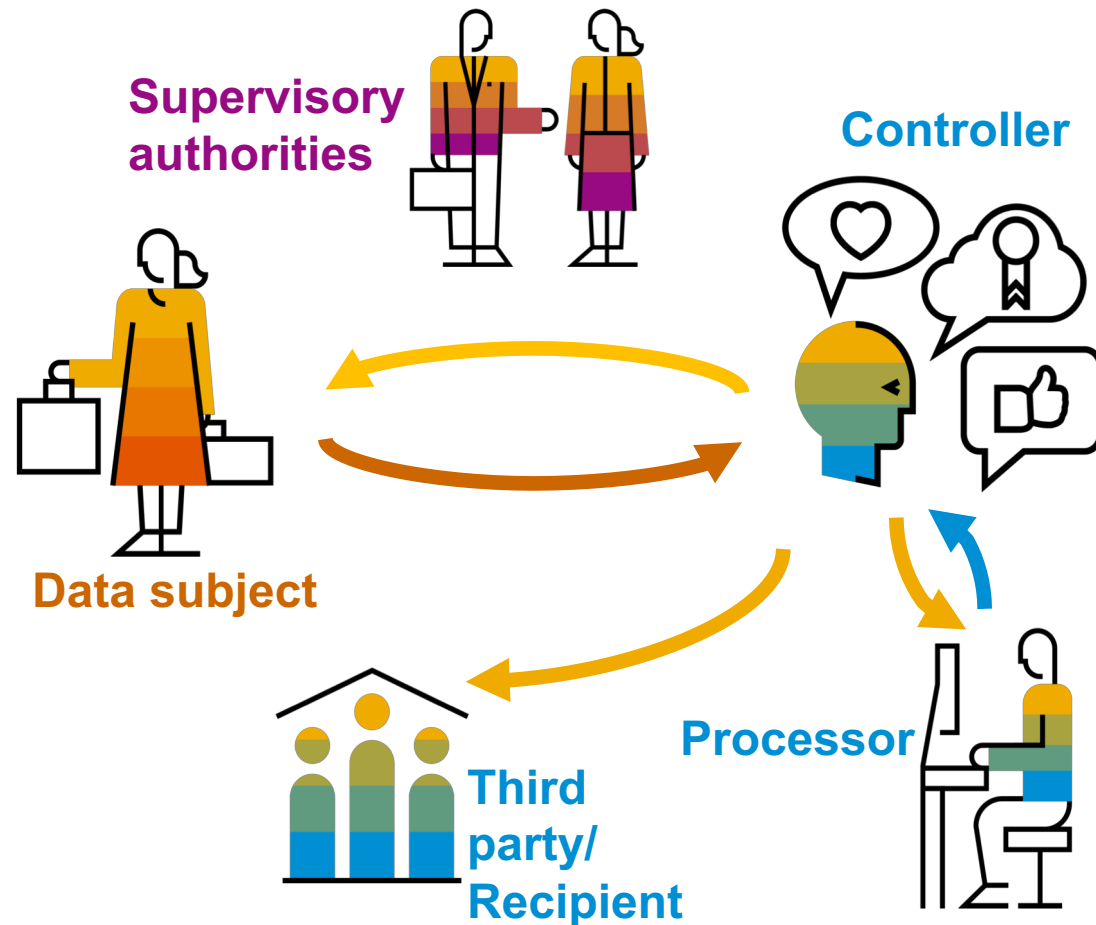
Controller determines the **purposes** and means of the **processing** of **personal data**

To understand the perspective of an Data Protection Officer: He will not ask for a single system or an application only. He will ask who is the **controller** defining the **purpose** of the end-to-end **processing** of **personal data**.

Compliance is not reached, if the processing of personal data in any step of the end-to-end process are matching the purpose.

Additional GDPR definitions and examples

... to complete the picture including missing stakeholders



(C) 2016 Datakontext GmbH in Gola, Jaspers, Mütthlein, Schwartzmann

Supervisory authorities are the administrative bodies in each EU Country (Art. 51 GDPR) empowered to control and decide on fines.

Third party/Recipient

Recipients are the bodies or persons which are getting personal data disclosed

Third parties are the bodies or persons which are either not under control of the controller, or under the control of the controller but not authorized which are getting personal data disclosed

Practical consequence

Both are subject of additional obligations of the controller. For instance of the **prior information** of the data subject to processing or the **information provided on request** of the data subject.

Basic GDPR Definitions for Cloud

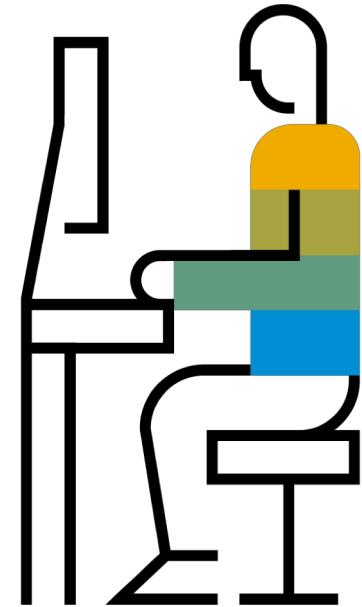
Data Processor

A **data processor** is a natural or legal person, public authority, agency or any other body which processes personal data “on behalf” of controller.

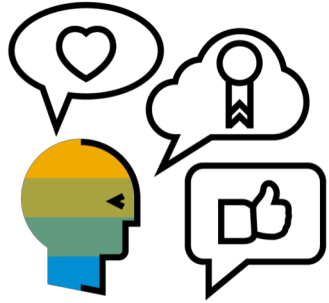
- Controller determines the purpose and the means of the processing of Personal Data
- Controller fully responsible
- Controller must be in ‘control’ of processing activities
- Processor must not decide independently on processing activities
- Processor must not use personal data for its own purpose

In SAP public cloud offerings

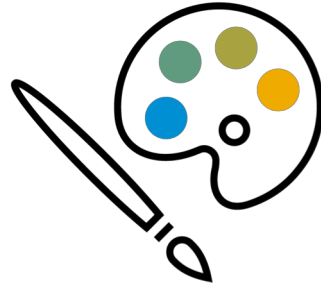
- Our customer using our service remains the data controller
- SAP becomes his data processor



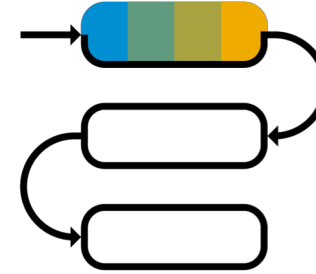
View of the Data Protection Officer: Public cloud



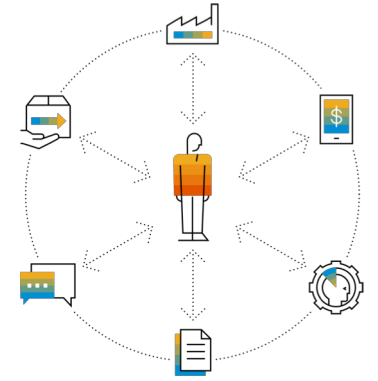
Controller determines



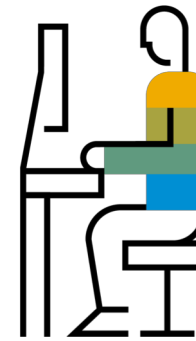
the **purposes** and means



of the **processing**



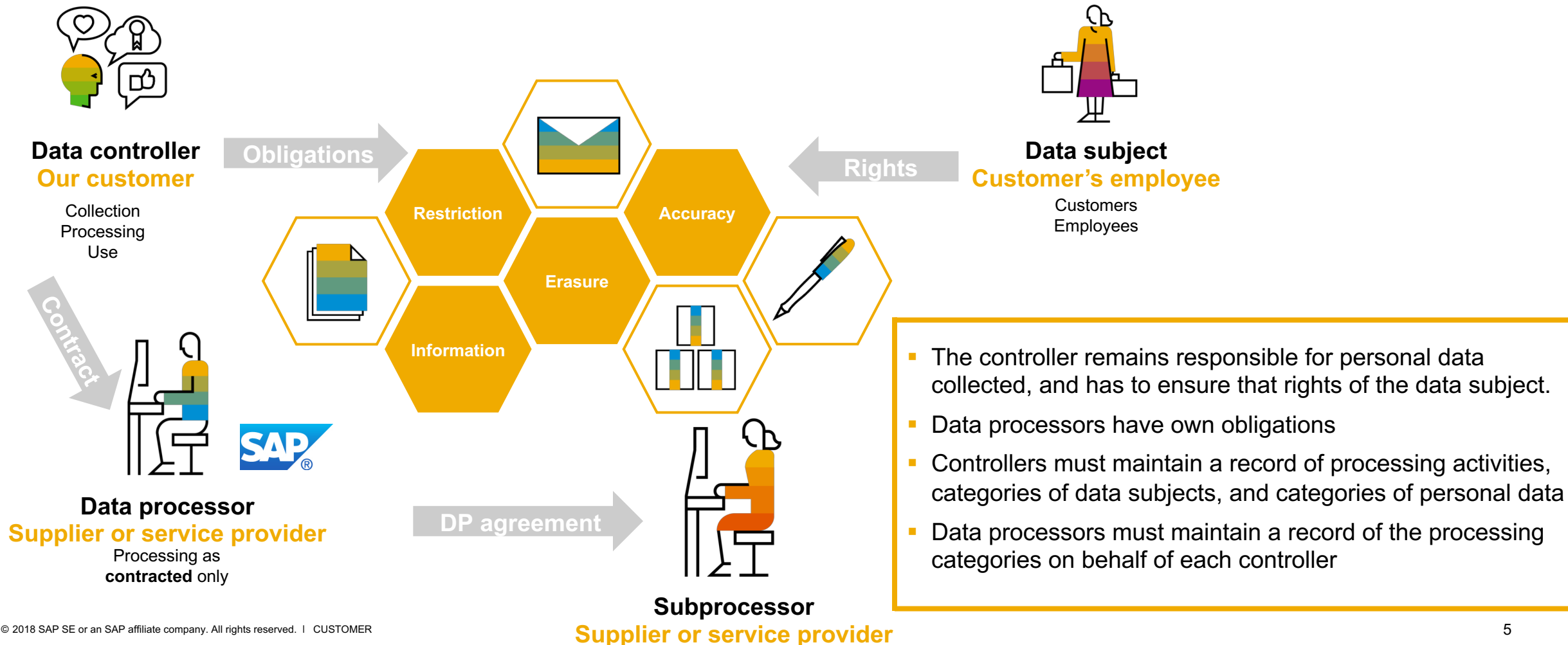
of **personal data**



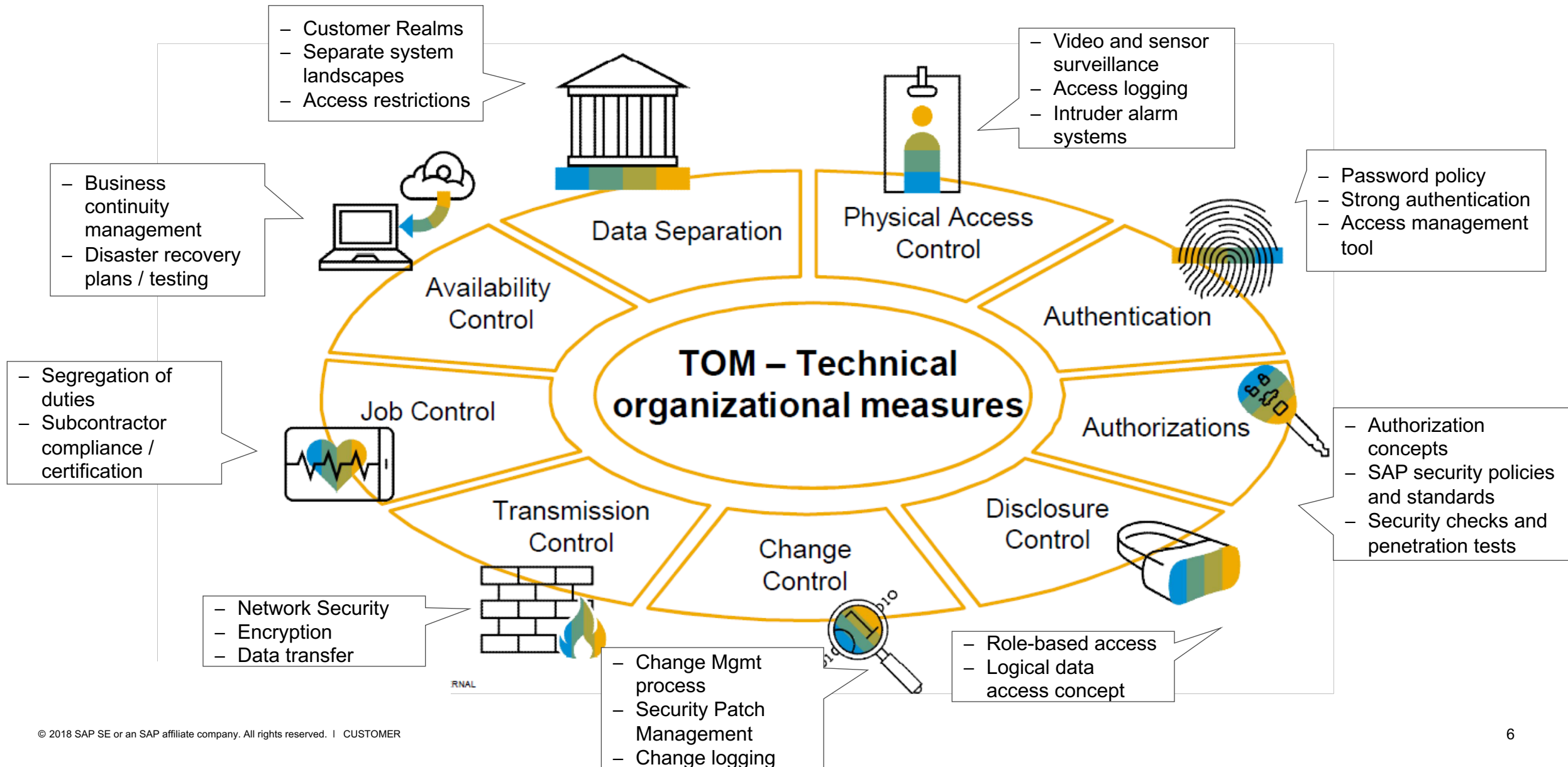
done by **processor**

Controller, processor and subprocessor

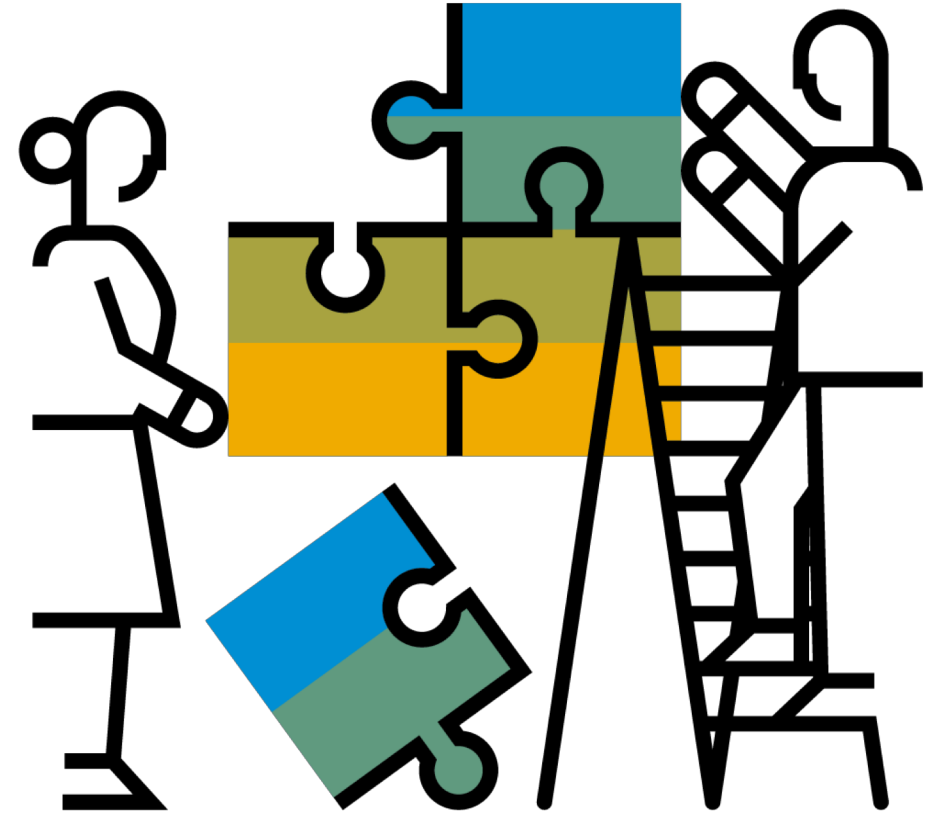
Rights of the data subject... always applicable



Security Safeguards: Technical & organizational measures (TOMs)



SAP Cloud Solutions GDPR Compliance



Operational framework for GDPR compliance



Data protection impact assessment



Data protection impact assessment of SAP cloud solutions and infrastructure components to identify and reduce the likelihood of risks



Map data processing



Data process mapping to declare and understand personal data flows and opportunities for additional compliance measures



Implementation



Vetting at multiple levels, including internal and external certification and attestation audits and subprocessor compliance assessments



Monitoring



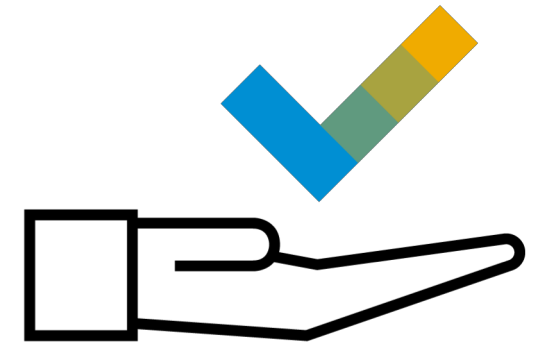
Monitor development and operational processes to ensure alignment with customers' processes to enable quick resolution of potential issues

How is SAP Cloud helping customers to be compliant with GDPR?

SAP is committed to help our customers be compliant with the EU General Data Protection Regulation (GDPR) by building necessary features into our products, services and infrastructure.

SAP Cloud Product Enhancements

Logging at Field Level	Opt-in and Opt-Out	Accountability
Visibility, Rectification and Portability	Personal Data Deletion	Privacy by Design and by Default
Access to Data and Logs	Retention and Blocking	Data Governance
Consent and Privacy Notice	Encryption in Transit / At Rest	Data Subject info

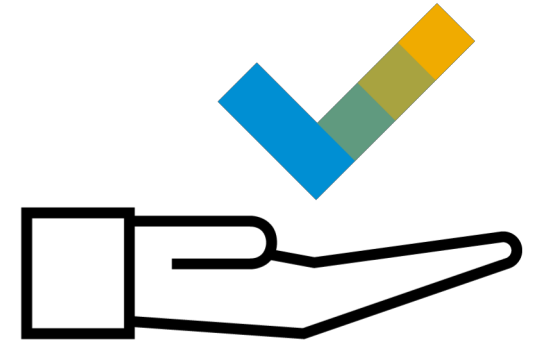


How is SAP helping customers to be compliant with GDPR?

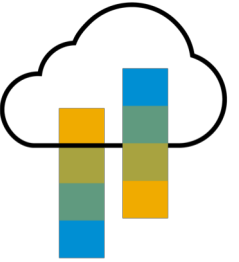
SAP is committed to help our customers be compliant with the EU General Data Protection Regulation (GDPR) by building necessary features into our products, services and infrastructure.

SAP Cloud Services Enhancements

Customer DPA	Sub-processor compliance (MDPA, TOMS)	Ongoing Compliance & Monitoring
DPO (Data Protection Officer)	DPMS (Data Protection Management System)	ROPA / PET (Record of Processing Activities)
Special Categories	International Transfers (EU SCC)	Awareness and Education
Privacy related support	Data Breach Notification	Risk Management



Key Customer Messages for SAP Cloud Solutions



Visibility, Rectification and Portability

- SAP Cloud solutions shall provide visibility through a printable report or display function/ UI to inform users about the personal data and preferences stored for them
- The data belonging to a shall be exportable in a standard machine-readable format
- Authorized users are allowed to edit and correct personal data

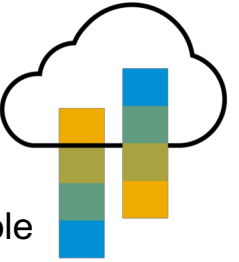
Access to Data and Logs

- SAP Cloud solutions shall provide industry-standard authorization, authentication and role-based access for customers and SAP admins
- Ensure read-only access to change logs for personal data, read logging for special categories of personal data
- No shared accounts, ticketing and workflow for new / terminate / move / inactive users, single sign-on

User Consent and Privacy Notice

- Depending on the solution, explicit user consent shall be captured and logged, the Privacy Notice shall be acknowledged before collecting any personal data
- SAP Cloud solutions shall provide self-service opt-In and opt-out including logging to enable users to set their preferences according to their needs. Preferences shall be set to the maximum restricted by default

Key Customer Messages for SAP Cloud Solutions



Personal Data Erasure

- Depending on the solution customers can individually delete or anonymize personal data, as user and role management is in the hands of the customer administrator
- Data retention times can be set per customer instance based on legal requirements and processing will be restricted during that time
- In any case general customer data deletion is performed upon contract termination

Data Breach Notification

- In addition to the SAP Cloud solutions support for customers regarding privacy-related questions and the individual's exercise of rights. Data Breach Notifications are provided via the established Incident Response Process including notification of the SAP DPO
- In case of a personal data breach SAP cloud solutions provide full support for the data processor obligation to notify of data breaches without undue delay. Customers can rely on an end to end process from the recognition of a breach up to the customer notification via the established SAP support channels

Privacy Impact Assessment

- Based on the initial register of processing activities (ROPA) and Data Protection Impact Assessments (DPIA), SAP Cloud solutions shall provide ongoing support by continuous compliance maintenance
- Data privacy impact assessments shall be fully integrated in product and process cycles to capture new developments as well as major changes

Examples data protection features in SAP Cloud

SAP Ariba

Collaborative Commerce Solutions
for the Entire Purchasing Process

SAP SuccessFactors

Human capital management
(HCM) solutions

SAP Hybris + Gigya

Omni-channel customer
facing commerce platform

SAP Ariba 

Key Cloud Products

SAP SuccessFactors 

SAP Hybris 

SAP Fieldglass 

SAP Concur 

SAP Fieldglass

Services to manage
contingent labor staffing

SAP Concur

Travel and expenses
management services

SAP Ariba data protection and privacy enhancements

All available in May 2018 release



Product

- PII erasure upon contract termination *) and on demand anonymization
- Consent logging and customizable privacy notice
- PII change logging on field-level and access to logs
- PII visibility *), rectification *) and portability
- Restricted processing
- Self-service opt in – opt out *) and logging
- Industry standard data access, authentication, authorization and encryption mechanisms *)
- Continuous improvement after May 25 (Phase 2): enhance self-service, data deletion and retention functionality, BS 10012 certification

Process

- Assistance to the customer (data controller) for privacy-related questions, executing rights of individuals, complaints and objections (via SAP support channels)
- Privacy breach responses: extension to IRP (via SAP support channels)
- Privacy notice update
- Record of processing activities (ROPA)
- Sub-processor compliance
- Ensure internal compliance with DPMS / PET
- Accountability (tools and certifications, privacy by design and by default practice, risk assessment, trainings, cross-border data transfer) *)
- Ongoing compliance maintenance and monitoring

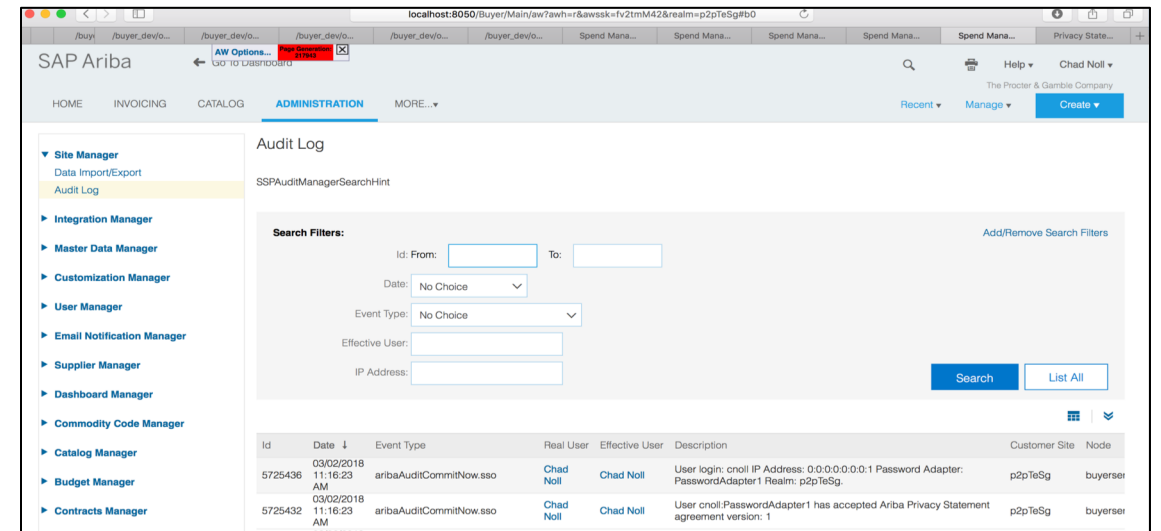
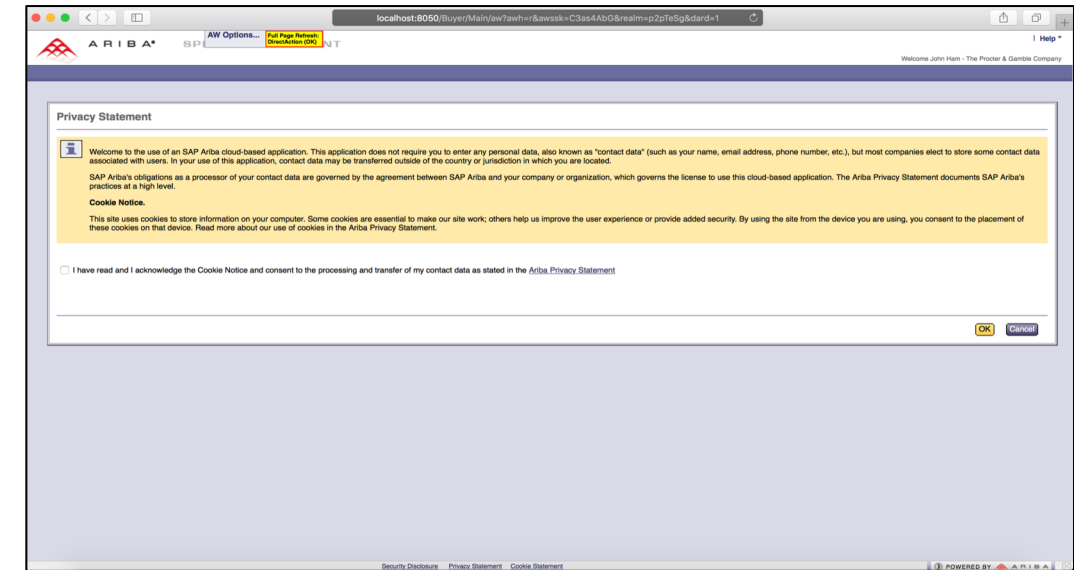
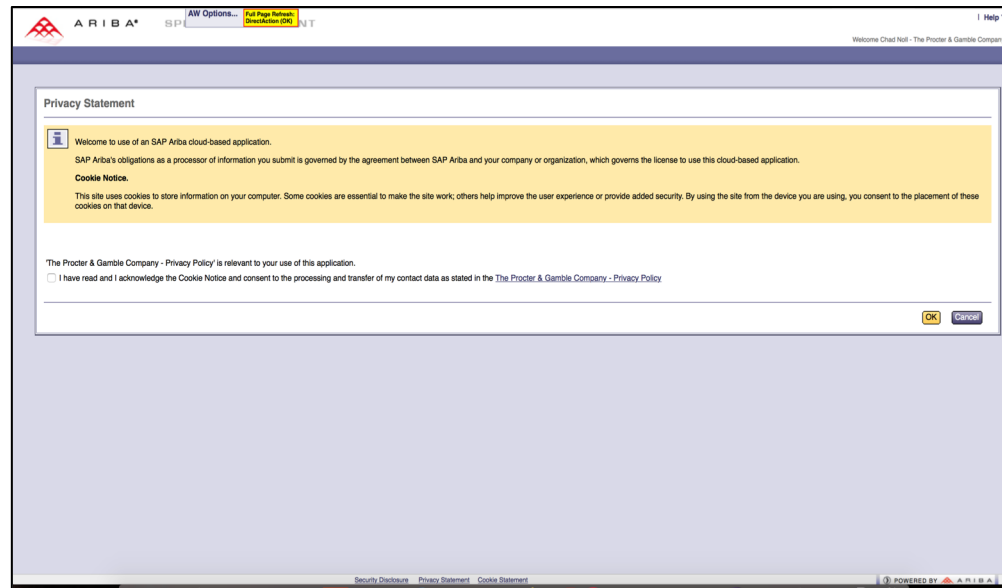
*) already available in the current product version

Customizable Privacy Statements

Privacy Statements can be configured:

1. Using the Ariba Privacy Statement (as is in current product version, but Ariba privacy statement updated for GDPR compliance)
2. Using a Custom Privacy Statement
3. Using no Privacy Statement (only cookie notice acceptance)

Consent logging can be viewed and downloaded



SAP Success Factors data protection and privacy enhancements

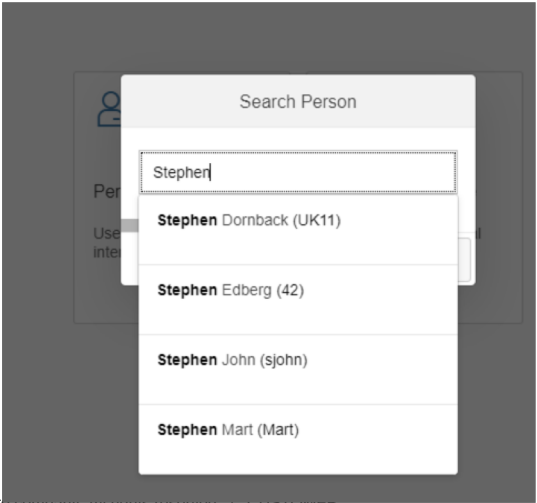
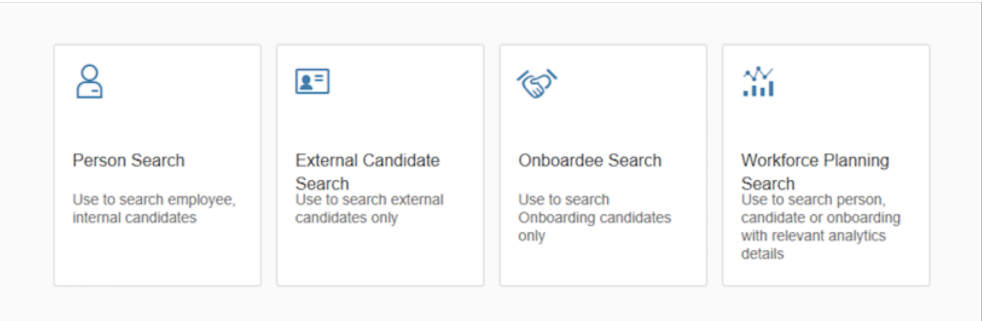
Available in May 2018 release



Area	Feature	Feature Summary
Data Subject's Rights	Data Subject Info Report	Enables customers to generate a Data Subject Report containing all the data subject's personal data available in the system
Data Subject's Rights	Data Purge / Destruction	Enables customers to configure Data Retention Rules, and permanently purge / destruct Personal Data
Data Subject's Rights	Data Blocking	Enables customers to limit access to data within an application
Accountability	Change Audit	Enables customers to manage, record and report on Personal Data changes
Accountability	Read Audit	Enables customers to configure fields as Sensitive Personal Data (SPD); Manage, Record and Report on Access to SPD
Lawful basis for processing	Consent	Provides ability to obtain consent when a candidate applies, agrees to receive future job postings (recruiting marketing/ management), etc.

Data Subject Information Report

Data Subject Search



Report Creation, Readiness Check & Availability

Back to Admin Center

Data Subject Information

Data Subject Search Configuration Reports

104 Reports

Name	Start Time	End Time	Status	Actions
EC_CORE10_14Feb2018_05_12_44 People	Feb 14, 2018 03:42	Feb 14, 2018 03:44	⚠	
EC_CORE10_14Feb2018_08_25_57 People	Feb 13, 2018 18:56	Feb 13, 2018 18:59	⚠	
Marcus_13Feb2018_03_38_00 People	Feb 13, 2018 02:08	Feb 13, 2018 02:09	⚠	
admin FN_admin LN_13Feb2018_03_11_19 People	Feb 13, 2018 01:41	Feb 13, 2018 01:43	⚠	
Marcus_13Feb2018_02_56_15 People	Feb 13, 2018 01:26	Feb 13, 2018 01:28	⚠	
Jennifer_13Feb2018_02_49_19 People	Feb 13, 2018 01:19	Feb 13, 2018 01:20	⚠	
Marcus_13Feb2018_02_48_09 People	Feb 13, 2018 01:18	Feb 13, 2018 01:19	⚠	

Where to find more information

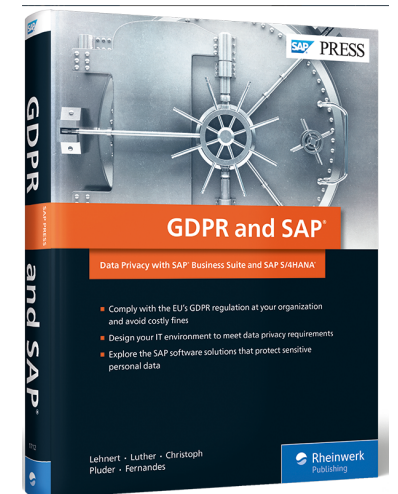
Volker Lehnert, Iwona Luther, Björn Christoph, and Carsten Pluder, *Datenschutz mit SAP: Der Praxisleitfaden zur EU-DSGVO-Umsetzung in SAP Business Suite und SAP S/4HANA* (SAP PRESS, 2017).

- A detailed data-protection-focused discussion on LOA & POA. Available soon in English
 - *GDPR and SAP – Data Privacy with SAP Business Suite and SAP S/4HANA*

Volker Lehnert, Katharina Bonitz, and Larry Justice, *Authorizations in SAP Software: Design and Configuration* (SAP PRESS, 2010).

Volker Lehnert, Katharina Stelzner, Anna Otto, and Peter John, *SAP-Berechtigungswesen, Konzeption und Realisierung* (SAP PRESS, 2012).

- A detailed security-based discussion on organizational topics



Thank you.

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