

*This Privacy Statement was updated on December 23, 2022*

## **SAP Partner Portal Privacy Statement**

Protecting the individual's privacy is crucial to the future of business. We have created this privacy statement to demonstrate our firm commitment to the individual's right to data protection and privacy. It outlines how we handle information that can be used to directly or indirectly identify an individual (personal data).

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### **Who do we mean when we say SAP in this Privacy Statement?**

This privacy statement applies to the collection and processing of personal data:

- during the central operation of this website and other globally operated SAP business activity by
  - **SAP SE**, Dietmar-Hopp-Allee 16 Walldorf 69190, Germany if you are in a member state of the EU or the EWR or in any of the countries of Andorra, Faroe Islands, Guernsey, Isle of Man, Jersey, Switzerland, or the United Kingdom or by
  - **SAP America Inc.**, 3809 West Chester Pike, Suite 200, Newtown Square, PA 19073, USA if you are in any other country, or
  - a **specific SAP group entity** as may be stated in the Additional Country and Regional Specific Provisions at the end of this privacy statement.
- in the context of a pre-contractual or contractual business relationship with you or your employer by a **local SAP group entity**
- in the context of a registration form when a **specific SAP group entity** is directly collecting personal data for the purpose of registering to a service or event and is therefore presented as the relevant controller on this registration page or website by referencing to this privacy statement.

SAP SE, SAP America, Inc., and each relevant SAP group entity are, depending on the given case, hereinafter referred to as "SAP".

This privacy statement does not apply to SAP internet-pages or web-services which present their own Privacy Statement.

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## **For what purposes does SAP process your personal data?**

When conducting business and operating our various web presences and other communication channels, SAP processes personal data of the people it interacts with, including customers, partners, suppliers, vendors, candidates, and any other people with whom we interact. In any of these cases, SAP may process personal data for one or more of the following business purposes:

### **To pursue business relationships with customers, partners, and others**

SAP processes personal data to pursue its business relationships with customers, partners, and other users to fulfill pre-contractual and contractual business relations. This may include satisfying requests, processing orders, delivering an ordered product or service, or engaging in any other relevant action to establish, fulfill and maintain our business relationships.

Products and services may include any of SAP's on-prem and cloud software products, web services, apps, online-forums, webinars and events, non-marketing related newsletters, white papers, tutorials, trainings, as well as other offerings like contests or sweepstakes. When you purchase or intend to purchase products or services from SAP on behalf of a corporate customer or are otherwise associated as contact person for the business relationship between SAP and a corporate customer or partner (a "Customer Contact"), SAP will use your personal data for this purpose. More specifically, SAP may use your personal data to confirm your opening of an account, manage the contract execution, send you disclosures as may be required by law, notice of payments, and other information about our products and services. SAP may respond to related inquiries, provide you with necessary support and process your feedback. In the context of your or your employers use of our products or services, SAP may communicate with you by post, email, live chat, contact forms, phone or any other medium to resolve your, a user's, or a customer's question or complaint or to investigate suspicious transactions. In case of telephone calls or chat sessions, SAP may record such calls or chat sessions to improve the quality of SAP's services after informing you accordingly during that call and, subject to applicable law, receiving your prior consent before the recording begins.

Customer Satisfaction - Within an existing business relationship between you or your employer and SAP, SAP processes your personal data to help us understand how satisfied you are with the functionality and quality of our products and services, to provide you with relevant information on our latest product announcements, software updates or upgrades, events, special offers, and other information about SAP's software and services that is relevant and useful to you.

**To develop products and services**

To the extent permitted by applicable law, SAP may process your personal data for internal research, technological demonstration and development, and to help SAP create, develop, operate, deliver, improve, upgrade or enhance SAP products and services. SAP may process personal data to create anonymized data sets which may then be used to improve SAP's products and services.

**To track learning and course completion status:**

SAP will process Personal Data to track learning and course completion to report it back to you or your employer, or in a particular external user group based on your membership in the external user group.

**To ensure compliance with laws and regulations**

SAP processes personal data to comply with statutory obligations.

- SAP processes your personal data for the purpose of ensuring an adequate level of technical and organizational security of SAP's products, services, online events, facilities, and premises. For this, SAP will take the measures necessary to verify or maintain the quality and safety of a product or service which is owned, manufactured by or for, or controlled by SAP. This may comprise the use of personal data for sufficient identification and authorization of designated users, internal quality control through auditing, analysis, and research, debugging to identify and repair errors that impair existing or intended functionality, account and network security, replication for loss prevention, detecting security incidents, protection against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for such kind of activity. We may further process your name, likeness, and other contact or compliance related data when you visit a local SAP affiliate or lab in the context of access management and video surveillance to protect the security and safety of our locations and assets.
- SAP and its products, technologies, and services are subject to the export laws of various countries including, without limitation, those of the European Union and its member states, and of the United States of America. Applicable export laws, trade sanctions, and embargoes issued by these countries oblige SAP to prevent organizations, legal entities and other parties listed on government-issued sanctioned-party lists from accessing certain products, technologies, and services through SAP's websites or other delivery channels (e.g. the European Union Sanctions List, the US sanctions lists including the Bureau of Industry and Security's (BIS) Denied Persons Lists (DPL), the Office of Foreign Assets Control's (OFAC) Specially Designated Nationals and Blocked Persons List (SDN-List) and the US DOCs Bureau of Industry and Security's Entity Lists and the United Nations Security Council Sanctions). SAP processes personal data to the extent necessary to comply with these legal requirements. Specifically, SAP processes personal data to conduct automated checks against applicable sanctioned-party lists, to regularly repeat such checks whenever a sanctioned-party list is updated or when a user updates his or her information. In case of a potential match, SAP will block the access to SAP's services and systems and

contact the user to confirm his or her identity.

- If necessary, SAP uses personal data to prevent or prosecute criminal activities such as any form of cybercrime, the illegal use of our products and services or fraud, to assert our rights or defend SAP against legal claims.
- To comply with data protection and unfair competition law related requirements. Depending on the country in which the relevant SAP Group company operates, and whether you have expressly consented to or opted out of receiving commercial information, SAP may process personal data necessary to accommodate your data protection and privacy choices for the receipt of such information and, when necessary to ensure compliance, exchange such information with the other entities of the SAP Group.

### **To operate SAP internet pages, web-offerings, or other online events**

SAP processes personal data for the purpose of operating, providing to you and administering your use of SAP's internet pages, web offerings, or other online events.

#### Creating user profiles

Certain web offerings linked to SAP's websites, including forums, blogs, and networks (e.g., the SAP Community), require you to register and create a user profile. Through the user profile you can share personal information about you with other users, such as your name, photo, social media accounts, postal or email address, telephone number, personal interests, skills, and basic information about your company. The user profiles serve to personalize the interactions between the users (for example, by way of messaging or follow functionality) and to allow SAP to foster the collaboration and quality of communication through such offerings. The profile settings of the relevant web offering allow you to determine which information you want to share.

#### Identity service

The user profile may be specific to a single web offering of SAP, but it also allows you to access other web offerings of SAP or of other entities of the SAP Group. It is your choice whether or not to use any of these additional web offerings. If you do, SAP will make your personal data available to such other web offering to provide you with initial access. Kindly note that without your consent for SAP to create such user profiles, SAP will not be able to offer such services to you where your consent is a statutory requirement that SAP can provide these services to you.

#### Event profiling

If you register for an event, seminar, or webinar of SAP, SAP may share basic participant information (your name, company, and email address) with other participants of the same event, seminar, or webinar to promote the interaction between the participants and to stimulate the communication and the exchange of ideas.

#### User experience improvement

SAP processes information that relates to your visit to our web offerings to improve your user experience, identify your individual demand and to personalize the way we provide you with the information you are looking for. For this purpose, we collect information regardless of whether you register with a user profile or not.

#### Cookies and similar tools

SAP processes personal data about the users of SAP websites and other web offerings using cookies or similar technologies for the purposes set out in SAP's [Cookie Statement](#). By visiting the "Cookie Preferences" link in the footer of the SAP Partner Portal homepage, you will find further information and have the option to exercise your cookie preferences.

#### **To offer SAP products and services**

SAP collects and processes personal data for sales and marketing purposes. We aim to keep you updated on upcoming events and SAP's latest products and services. If possible, we may contact you to discuss further your interest in SAP services and offerings.

#### Request feedback, questionnaires and surveys

To the extent allowed by applicable law, SAP may contact you for feedback regarding the improvement of the relevant material, product, or service. SAP may also invite you to participate in questionnaires and surveys. These will generally be designed so you can participate without having to provide information that identifies you as a participant. If you nonetheless provide your personal data, SAP will use it for the purpose stated in the questionnaire or survey or to improve its products and services.

#### To keep you up to date

Within an existing business relationship between you or your employer and SAP, SAP processes your personal data to inform you about SAP products or services which are similar or relate to products and services you or your employer have already purchased or used. SAP will inform you by email or phone about such news only as far as it is allowed by law, or if SAP has collected such information in the context of the business relationship. You are entitled to object to SAP's use for this purpose at any time by selecting the opt-out option at the bottom of each marketing related approach.

#### Personalized Content

SAP processes information about your interactions with SAP across its various business areas and its offerings (your or your employers prior and current use of SAP products or services, your participation in and use of SAP's web offerings, events, white papers, free trials or newsletters) to provide you with the requested products and services and to improve our personal communications with you. This data may also be used to efficiently operate SAP's business, which also includes: the automation and aggregation of data to support various analytic and

statistical efforts, performance and predictive analytics and exploratory data science to support your customer journey and to fulfill such requests. To the extent permitted by law, SAP may combine and use such information in an aggregated manner to help us understand your interests and business demands, develop our business insight and marketing strategies, and to create, develop, deliver, and improve our personalized communications with you. It may also be used by SAP to display relevant content on SAP owned or third-party websites.

#### Advertising ID's

Provided your consent or to the extent permitted by applicable law, SAP may create a hashed user ID to provide to third party operated social networks or other web offerings (such as Twitter, LinkedIn, Facebook, Instagram or Google). This information is then matched against the third party's own user database to display to you more relevant SAP content.

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### **What personal data does SAP process?**

SAP processes various types of personal data about the people we interact with when conducting our business or operating our various web presences and other communication channels.

Depending on the individual case, this may comprise the following types of personal data:

#### **Contact Data**

SAP processes the following categories of personal data as contact data: first name, last name, email addresses, postal address/location (country, state/province, city), telephone numbers, and your relationship history with SAP.

#### **Personal data related to the business relationship with SAP**

In the context of established business relationships, SAP processes the business partners company name, industry, your job title and role, department and function and your company's relationship history to SAP. If you provide a credit card number or bank details to order products or services, SAP will collect this information to process your payment for the requested products or services.

#### **Compliance related personal data**

If required by statutory law or regulation, SAP may process data categories like date of birth, academic credentials, identity cards or other ID numbers, geolocation, business partner relevant information about e.g., significant litigation or other legal proceedings, and other export control or custom compliance relevant information.

#### **Data generated through your use of, or participation in, SAP's internet pages, web, or online offerings**

#### Usage data

SAP processes certain user related information, e.g., info regarding your browser, operating system, or your IP address when you visit SAP's web properties. We also process information regarding your use of our web-offerings, like the pages you visit, the amount of time you spend on a page, the page which has referred you to our page and the links on our sites you select.

#### Registration data

SAP may process your contact data as set out above and other information which you may provide directly to SAP if you register for any of SAP's events or other web services.

#### Participation data

When you participate in webinars, virtual seminars, events, or other SAP web services, SAP may process your interactions with the relevant webservice to organize the event including its sessions, polls, surveys, or other interactions between SAP and/or its participants. Depending on the event and subject to a respective notification of the participants, SAP may collect audio and video recordings of the event or session.

### **Special categories of personal data**

In connection with the registration for an event, SAP may ask for your dietary preferences or information about potential disabilities for purposes of consideration for the health and well-being of our guests. Any collection of such information is always based on the consent of the participants. Kindly note that if you do not provide such information about dietary preferences, SAP may not have the opportunity to respond to such requests at the time of the event.

### **Personal data received by third parties, including publicly available sources**

SAP generally aims to collect personal data directly from the data subjects. If you or applicable law allows SAP to do so, SAP may obtain personal data also from third party sources. These third-party sources may include:

- your employer in the context of its business dealings with SAP and/or the SAP Group,
- third parties you directed to share your personal data with SAP,
- third party sources and publicly available sources like business oriented social networks or information broker.

When we collect personal data from third party sources, established internal controls aim to ensure that the third-party source was permitted to provide this information to SAP and that we may use it for this purpose. SAP will treat this personal data according to this Privacy Statement, plus any additional restrictions imposed by the third party that provided the personal data to SAP or by applicable national law.

### **Personal data necessary for customer satisfaction**

To the extent permitted by law or based on your consent, SAP may combine the information we collect either directly or indirectly about specific users to ensure the completeness and correctness of the data and to help us better tailor our interactions with you and determine the information which best serves your respective interest or demand.

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### **How long does SAP process my personal data?**

SAP processes your personal data only for as long as it is required:

- to make products and services requested by you or your employer available to you;
- to make relevant course and learning offerings available to you;
- for SAP to comply with statutory obligations to retain personal data, resulting inter alia e.g. from applicable export, finance, tax or commercial laws;
- to fulfill SAP's legitimate business purposes as further described in this Privacy Statement, unless you object to SAP's use of your personal data for these purposes;
- until you revoke a consent you previously granted to SAP to process your personal data. To learn more about how you may revoke consent, please see guidance below in section titled, "What are your data protection rights".

SAP may process your personal data for product or service development until this no longer necessary or SAP is informed that your relationship with the SAP customer has changed. SAP may retain your personal data for additional periods if necessary for compliance with legal obligations to process your personal data or if the personal data is needed by SAP to assert or defend itself against legal claims. SAP will retain your personal data until the end of the relevant retention period or until the claims in question have been settled.

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### **Who are the recipients of your personal data?**

Your personal data may be passed on to the following categories of third parties:

#### **Entities of the SAP Group**

As SAP is selling its products and services to its customers only via local business relationships, SAP may transfer your personal data to the locally relevant SAP group entity for the purpose and to the extent necessary to conduct a business relationship. Other entities of the SAP Group may also receive or gain access to personal data either when rendering group internal services centrally and on behalf of SAP SE and the other SAP group entities or when personal data is transferred to them on a respective legal basis. In these cases, these entities may process the personal data for the same purposes and under the same conditions as outlined in this Privacy Statement. The



current list of SAP Group entities can be found [here](#). If you would like to find out which SAP group entity is responsible for the business relationship with you or your employer, please contact us at [webmaster@sap.com](mailto:webmaster@sap.com).

### **Third party service providers**

SAP may engage third party service providers to process personal data on SAP's behalf, e.g., for consulting or other services, the provision of the website, the fulfillment and provisioning of offers from SAP or newsletter dispatch. These service providers may receive or are granted with access to personal data when rendering their services and will constitute recipients within the meaning of the relevant DP law, including GDPR.

In case you subscribe to the SAP Partner Update, SAP will forward your email address, country, product and solution preferences to Impartner UK Limited, Units 2,3,4, The Old Brewery Yard Battle, East Sussex, United Kingdom, TN33 0AF. Registered in England. Company Number: 11360392. Impartner UK Limited use this personal data for sending out the interest-based newsletter.

### **SAP partners**

With your consent or as otherwise indicated by your request, including to fulfill your ordered services, SAP may share your personal data with designated partner companies to provide you the product or service you have requested.

### **Other third parties**

SAP may transfer your registration data based on your consent or as otherwise indicated by your request to companies listed on the registration page of an SAP seminar, webinar or event. These companies may receive your personal data as co-organizer or sponsor of the event and will use your registration data for the purposes of their participation in the event. They will provide you directly with any legally required information about their processing purposes and how you may exercise your rights.

External user groups that you join (e.g. ASUG (Americas' SAP Users' Group is an independent SAP user group))

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## **What are your data protection rights?**

### **Right to access, correct and delete**

You can request from SAP at any time access to information about which personal data SAP processes about you and, if necessary, the correction or deletion of such personal data. Please note, however, that SAP can or will delete your personal data only if there is no statutory obligation or prevailing right of SAP to retain it. If you request from SAP to delete your personal data, you may not be able to continue to use any SAP service that requires SAP's use of your personal data.

**Right to receive personal data back from SAP**

If SAP uses your personal data based on your consent or to perform a contract with you, you can further request from SAP a copy of the personal data you provided to SAP. In this case, please contact [webmaster@sap.com](mailto:webmaster@sap.com) and specify the information or processing activities to which your request relates, the format in which you would like to receive the personal data, and whether it should be sent to you or another recipient. SAP will carefully consider your request and discuss with you how it can best be fulfilled.

**Right to restrict**

You can request from SAP to restrict your personal data from further processing in any of the following events:

- you state the personal data about you is incorrect, subject to the time SAP requires to check the accuracy of the relevant personal data,
- there is no legal basis for SAP to process your personal data and you demand SAP to restrict your personal data from further processing,
- SAP no longer requires your personal data, but you state you require SAP to retain such data to claim or exercise legal rights or to defend against third party claims, or
- in case you object to the processing of your personal data by SAP based on SAP's legitimate interest (as further set out below), subject to the time required for SAP to determine whether it has a prevailing interest or legal obligation in processing your personal data.

**Right to object**

If and to the extent SAP is processing your personal data based on SAP's Legitimate Interest, specifically where SAP pursues its legitimate interest to engage in direct marketing or to apply profiling in relation to direct marketing, you have the right to object to such a use of your personal data at any time. When you object to SAP's processing of your personal data for direct marketing purposes, SAP will immediately cease to process your personal data for such purposes. In all other cases, SAP will carefully review your objection and cease further use of the relevant information, subject to SAP's compelling legitimate grounds for continued use of the information, which may override your interest in objecting, or if SAP requires the information for the establishment, exercise, or defense of legal claims.

**Right to revoke consent**

Wherever SAP is processing your personal data based on your consent, you may at any time withdraw your consent by unsubscribing or giving us respective notice of withdrawal. In case of withdrawal, SAP will not process personal data subject to this consent any longer unless legally required to do so. In case SAP is required to retain your personal data for legal reasons your personal data will be restricted from further processing and only retained for the term required by law. However, any withdrawal has

no effect on past processing of personal data by SAP up to the point in time of your withdrawal. Furthermore, if your use of an SAP offering requires your prior consent, SAP will no longer be able to provide the relevant service (or services, if you revoke the consent for SAP to use your profile under the SAP Identity Authentication Service for multiple SAP offerings), offer or event to you after your revocation.

### **Right to lodge a complaint**

If you take the view that SAP is not processing your personal data in accordance with the requirements in this Privacy Statement or under applicable data protection laws, you can at any time, to the extent required by applicable law, lodge a complaint with your locally relevant data protection authority, specifically when you are located in an EEA country, or with the data protection authority of the country or state where SAP has its registered seat.

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### **How can you exercise your data protection rights?**

Please direct any requests to exercise your rights to [webmaster@sap.com](mailto:webmaster@sap.com)

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### **How will SAP verify requests to exercise data protection rights?**

SAP will take steps to ensure it verifies your identity to a reasonable degree of certainty before it will process the data protection right you want to exercise. When feasible, SAP will match personal data provided by you in submitting a request to exercise your rights with information already maintained by SAP. This could include matching two or more data points you provide when you submit a request with two or more data points that are already maintained by SAP. SAP will decline to process requests that are manifestly unfounded, excessive, fraudulent, represented by third parties without duly representing respective authority or are otherwise not required by local law.

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### **Can I use SAP's products and services if I am a minor or child?**

In general, SAP websites and online services are not directed to users below the age of 16 years, or equivalent minimum age in the relevant jurisdiction. If you are younger than 16, you cannot register with and use these websites or online services.

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## **Additional Country and Regional Specific Provisions**

**Where SAP is subject to privacy requirements in the EU, EEA, or other GDPR relevant countries**

**Who is the Data Protection Officer of the Controller?**

You can reach SAP Group's data protection officer any time at [privacy@sap.com](mailto:privacy@sap.com).

**Who is the relevant Data Protection authority of the Controller?**

SAP's lead data protection supervisory authority is in Germany, the *Landesbeauftragter für den Datenschutz und die Informationsfreiheit Baden-Württemberg* and can be reached at *Lautenschlagerstraße 20, 70173 Stuttgart*. If you are in any other EU or EWR country, you may find the contact details of your competent data protection supervisory authority [here](#).

**What are the legal permissions for SAP to process personal data?**

SAP is processing your personal data for the business purposes set out above based on the following legal permissions:

**General remark regarding SAP's processing of personal data based on your prior consent**

SAP may process your personal data for the specific processing purposes based on your prior consent.

**General remark regarding SAP's processing of personal data based on legitimate business interest**

Where we refer to GDPR Article 6.1 (f) and consequently SAP's legitimate business interest as our legal permission to process your personal data, SAP is pursuing its legitimate business interests

- to efficiently manage and perform its business operations,
- to maintain and operate intelligent and sustainable business processes in a group structure optimized for the division of labor and in the best interest of our employees, customers, partners, and shareholders,
- to operate sustainable business relationships with SAP customers and partners including you (each of which as further set out below),
- serve you with the best possible user experience when using SAP's web services,
- comply with extraterritorial laws and regulations, or
- assert or defend itself against legal claims.

We believe that our interest in pursuing these business purposes is legitimate and thereby not outweighed by your personal rights and interest to refrain from processing. In any of these cases, we duly factor into our balancing test:

- the business purpose reasonably pursued by SAP in the given case,
- the categories, amount and sensitivity of personal data that is necessarily being processed,

- the level of protection of your personal data which is ensured by means of our general data protection policies, guidelines, and processes,
- and the rights you have in relation to the processing activity.

If you wish to obtain further information on this approach, please contact [webmaster@sap.com](mailto:webmaster@sap.com).

### **Pursue business relationships with customers, partners, and others**

When pursuing business relationships with customers, partners and others, SAP and local SAP group entities may be processing personal data based on:

- GDPR Article 6.1 (b) if necessary, to fulfill (pre-)contractual obligations with you,
- GDPR Article 6.1 (c) if necessary, to fulfill legal requirements applicable to SAP,
- GDPR Article 6.1 (f) if the contract or pre-contractual relation relates to a company or other legal body and if SAP processes your personal data as Customer Contact to fulfill (pre-) contractual obligations with your employer (legitimate interest to efficiently perform or manage SAP's business operation)
- GDPR Article 6.1 (f) if necessary, to maintain our business relationships with you, ensure your satisfaction as a user or customer representative, and provide you with information about other SAP products and services as indicated by your interest or demand (legitimate interest to operate sustainable business relationship with SAP customers and partners), or
- a legal permission under other national laws equivalent to any of the above, when applicable.

### **Ensure compliance with laws and regulation**

When ensuring compliance with applicable laws and regulations, SAP and local SAP group entities may process your Personal data based on

- GDPR Article 6.1 (c) if necessary, to fulfill legal requirements under European Union or EU Member State law to which SAP is subject,
- GDPR Article 6.1 (f) if necessary, to fulfill laws and regulations extraterritorial to the EU (legitimate interest to comply with extraterritorial laws and regulations),
- or the equivalent articles under other national laws, when applicable.

### **Operate SAP internet pages, web offering, or other online events**

When operating its internet pages, web-offerings or other online events ("web-services") and depending on the respective operating purpose, SAP or the local SAP group entity is processing your personal data on the basis of the following legal permissions:

- GDPR Article 6.1 (b) and (f) to provide the web services and functions, create and administer your online account, updating, securing, troubleshooting the service, providing support, improving, and developing the web service, answering and fulfilling your requests or instructions, (legitimate interest to efficiently perform or manage SAPs business operation)
- GDPR Article 6.1 (c) and (f) to manage and ensure the security of our web services and prevent and detect security threats, fraud or other criminal or malicious activities and as reasonably necessary to enforce the web services terms, to establish or preserve a legal claim or defense, to prevent fraud or other illegal activities, including attacks on our information technology systems (legitimate interest to efficiently perform or manage SAP's business operation and assert or defend itself against legal claims)
- GDPR Article 6.1 (a) if it is necessary that we ask you for your consent to process your personal data
- or equivalent legal permissions under other relevant national laws, when applicable.

### **Cookies and similar tools**

When tracking and evaluating the usage behavior of users of our web services by means of cookies or similar technologies, SAP is processing your personal data on the basis of the following legal permissions:

- GDPR Article 6.1 (a) if it is necessary that we ask you for your consent to process your personal data,
- GDPR Article 6.1 (b) if necessary to fulfill (pre-)contractual obligations with you,
- GDPR Article 6.1 (f) if necessary to fulfill (pre-)contractual obligations with the company or other legal body you represent as a customer contact (legitimate interest to efficiently perform or manage SAP's business operation),
- or equivalent legal permissions under other relevant national laws, when applicable.

### **Collection of data from third parties, including publicly available sources**

When collecting personal data about you from third parties, the legal basis for the collection by SAP or the local SAP group entity may be based on:

- GDPR Article 6.1 (a) if it is necessary that we or the third party transferring your personal data to SAP has asked you for your consent to process your personal data,
- GDPR Article 6.1 (b) if necessary to fulfill (pre-)contractual obligations with you,
- GDPR Article 6.1 (c) if necessary to fulfill legal requirements under European Union or EU Member State law to which SAP is subject,
- GDPR Article 6.1 (f) if necessary to fulfill laws and regulations extraterritorial to the EU (legitimate interest to comply with extraterritorial laws and regulations) or to maintain our business relationships with you, ensure your satisfaction as a user or customer representative, and provide you with information about other SAP products and services as indicated by your interest or demand (legitimate interest to operate sustainable business relationship with SAP customers and partners)
- or equivalent legal permissions under other relevant national laws, when applicable.

### **Offering SAP products and services**

When engaging in marketing activities, SAP is processing your personal data on the basis of the following legal permissions:

- GDPR Article 6.1 (a) if your consent is required by law for SAP to process your data for this purpose,
- GDPR Article 6.1 (f) if necessary to fulfill (pre-)contractual obligations with the company or other legal body you represent as a customer contact (legitimate interest to efficiently perform or manage SAP's business operation), to maintain our business relationships with you or your employer, to ensure your satisfaction as a user or customer contact, to map the relevant group internal structures and bundle relevant business activities at central sources within the SAP Group to operate them uniformly and to provide you with information about other SAP products and services as indicated by your interest or demand, which may also comprise the combination about you from different sources (profiling) (legitimate interest to maintain and operate intelligent and sustainable business processes in a group structure optimized for the division of labor and in the best interest of our employees, customers, partners, and shareholders and to operate sustainable business relationship with SAP customers and partners). SAP may provide you with this information to

your postal address to pursue our legitimate interest to address customers, prospects and targets for the purpose of advertising our products and services, to your email address for the purpose of direct marketing of similar products or services provided that we (i) received your email address in connection with the purchase of our products or services, (ii) you did not object to the use of your email address for direct advertising and (iii) and we inform you in every approach that you may object to our use of your email address for marketing purposes at any time, and by other electronic means (e.g., telephone, MMS) to the extent permitted under applicable law, generally either explicit or presumed consent,

- or equivalent legal permissions under other relevant national laws, when applicable.

### **How does SAP justify international data transfers?**

As a global group of companies, SAP has group affiliates and uses third party service providers also in countries outside the European Economic Area (the “EEA”). SAP may transfer your personal data to countries outside the EEA as part of SAP’s international business operations. If we transfer personal data from a country in the EU or the EEA to a country outside the EEA and for which the EU Commission has not issued an adequacy decision, SAP uses the EU standard contractual clauses to contractually require the data importer to ensure a level of data protection consistent with the one in the EEA to protect your personal data. You may obtain a copy (redacted to remove commercial or irrelevant information) of such standard contractual clauses by sending a request to [privacy@sap.com](mailto:privacy@sap.com). You may also obtain more information from the European Commission on the international dimension of data protection [here](#).

**Where SAP is subject to certain privacy requirements in the United States**, the following also applies:

U.S. Children’s Privacy. SAP does not knowingly collect the personal data of children under the age of 13. If you are a parent or guardian and believe SAP collected information about a child, please contact SAP as described in this Privacy Statement. SAP will take steps to delete the information as soon as possible. Given that SAP websites and online services are not directed to users under 16 years of age and in accordance with the disclosure requirements of the CCPA, SAP does not sell the personal data of any minors under 16 years of age.

**Where SAP is subject to certain privacy requirements in the United States in the State of California**, the following also applies:

Do Not Track. Your browser may allow you to set a “Do not track” preference. Unless otherwise stated, our sites do not honor “Do not track” requests. However, you may elect not to accept cookies by changing the designated settings on your web browser or, where available, by referring to our [Cookie Statement](#). Cookies are small text files placed on your computer while visiting certain sites on the Internet used to identify your



computer. If you do not accept cookies, you may not be able to use certain functions and features of our site. This site does not allow third parties to gather information about you over time and across sites.

You have the right:

- to request from SAP access to your personal data that SAP collects, uses, or discloses about you;
- to request that SAP delete personal data about you;
- to opt-out of the use or disclosure of your sensitive personal information;
- to non-discriminatory treatment for exercise of any of your data protection rights;
- if you request access to your personal data, for such information to be portable, if possible, in a readily usable format that allows you to transmit this information to another recipient without hindrance

In accordance with the disclosure requirements under the California Consumer Privacy Act ("CCPA"), SAP does not and will not sell your personal data or otherwise permit the use of your information for any kind of cross-context behavioral advertising. In accordance with the verification process set forth in the CCPA, SAP will require a more stringent verification process for deletion requests, or for personal data that is considered sensitive or valuable, to minimize the harm that might be posed to you by unauthorized access or deletion of your personal data. If SAP must request additional information from you outside of information that is already maintained by SAP, SAP will only use it to verify your identity so you can exercise your data protection rights, or for security and fraud-prevention purposes.

In addition to contacting SAP at [webmaster@sap.com](mailto:webmaster@sap.com), you may also exercise your rights as follows:

You can call toll-free to submit a request using the numbers provided [here](#), or click here "[Limit the Use of My Sensitive Personal Information](#)" and send the details to us in an email. You can also designate an authorized agent to submit requests to exercise your data protection rights to SAP. Such authorized agent must be registered with the California Secretary of State and submit proof that you have given authorization for the agent to act on your behalf

**Where SAP is subject to the requirements of the Brazilian General Data Protection Law ("LGPD"), the following also applies:**

SAP has appointed a Data Protection Officer for Brazil. Written inquiries, requests or complaints to our Data Protection Officer may be addressed to:

Paulo Nittolo Costa

Email: [webmaster@sap.com](mailto:webmaster@sap.com)

Address: Avenida das Nações Unidas 14171 - Marble Tower – 7th Floor - São Paulo-SP, Brazil 04794-000

**When SAP is subject to the requirements of the Malaysian Personal Data Protection Act ("PDPA")**, a Malaysian Bahasa version of this privacy statement is available.

**Where SAP is subject to certain privacy requirements in the Philippines**, the following also applies:

For individuals within the Philippines, you may exercise your rights as follows:

You can call or write to SAP to submit a request at:

webmaster@sap.com

Phone: +632-8705-2500

Address: SAP Philippines, Inc.

Attn: Data Protection Officer

27F Nac Tower, Taguig City 1632, Philippines

The following provisions apply to residents and citizens of the Philippines:

You may claim compensation as finally awarded by the National Privacy Commission or the courts if you suffered damages due to inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of personal data, considering any violation of your rights and freedoms as a data subject;

If you are the subject of a privacy violation or personal data breach or are otherwise personally affected by a violation of the Data Privacy Act, you may file a complaint with the National Privacy Commission.

Your Transmissibility Rights. Your lawful heirs and assigns may invoke your rights at any time after your death or when you are incapacitated or incapable of exercising your rights.

**Where SAP is subject to the requirements of the Singapore's Personal data Protection Act ("PDPA")**, the following also applies:

SAP has appointed a Data Protection Officer for Singapore. Written inquiries, requests or complaints to our Data Protection Officer may be addressed to:

Subject: [Attn.] Tina Bhatia, DPO (Singapore)

Email: webmaster@sap.com

Address: Mapletree Business City, 30 Pasir Panjang Rd, Singapore 117440

Contact: +65 6664 6868

**Where SAP is subject to the requirements of the Protection of Personal Information Act, 2013 ("POPIA") in South Africa**, the following also applies:

"Personal data" as used in this Privacy Statement means Personal Information as such term is defined under POPIA.

"You" and "Your" as used in this Privacy Statement means a natural person or a juristic person as such term is used under POPIA.

Systems Applications Products (Africa Region) Proprietary Limited & Systems Applications Products (South Africa) Proprietary Limited with registered address at 1

Woodmead Drive, Woodmead (SAP South Africa) is subject to South Africa's Protection of Personal Information Act, 2013 (Act 4 of 2013) and responsible party under the POPIA.

Should you as an individual or a juristic person believe that SAP South Africa as responsible party has utilized your personal information contrary to POPIA, you undertake to first attempt to resolve any concerns with SAP South Africa.

webmaster@sap.com

Phone: 011 325 6000

Address: 1 Woodmead Drive, Woodmead, Johannesburg South Africa 2148

If you are not satisfied with such process, you have the right to lodge a complaint with the Information Regulator, using the contact details listed below:

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001, P.O. Box 31533, Braamfontein, Johannesburg, 2017

Email: complaints.IR@justice.gov.za

Enquires: infoereg@justice.gov.za

You may request details of personal information which we hold about you under the Promotion of Access to Information Act 2 of 2000 ("PAIA"). For further information please review the SAP PAIA manual

**Where SAP is subject to certain privacy requirements in Turkey**, the following also applies:

When SAP is collecting personal data during the central operation of this website and other globally operated SAP business activity for residents and citizens of Turkey and in a manner subject to the requirements of the Law on the Protection of Personal Data #6698 ("LPDP") in Turkey, your data controller is: SAP Türkiye Yazılım Üretim ve Ticaret A.Ş., located in Emaar Square Ofis Kulesi, Libadiye Cd No:82-F D:Kat: 17-18, 34700 Ünalán/Üsküdar/İstanbul with MERSİS No: 744017604300017 and phone number: +90 216 330 03 00.

**[China-Specific Provisions](#)** apply to citizens of the People's Republic of China.

**[Colombia-Specific Provisions](#)** apply to citizens of the Republic of Colombia.

**[Russian-Specific Provisions](#)** apply to citizens of the Russian Federation.

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