

*This Privacy Statement was updated on February 08, 2023*

*Click [here](#) for a printable version of this Privacy Statement.*

## **SAP PRIVACY STATEMENT**

Protecting the individual's privacy is crucial to the future of business. We have created this Privacy Statement to demonstrate the firm commitment of SAP (hereinafter "We", "SAP", "Us" or "Our") 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 (hereinafter "Personal Data").

### **A. General information**

#### ***I. Who do We mean when We say SAP in this Privacy Statement***

The data controller for SAP Discovery Center is SAP SE, Dietmar-Hopp-Allee 16, 69190 Walldorf/Germany, together with its wholly owned subsidiaries (collectively "SAP").

Where a registration form is presented on this website, the controller may vary depending on the actual offering or the purpose of the data collection, but it is in any case displayed on the individual registration form's privacy statement.

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

#### **II. For what purposes does SAP process your 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 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 operate SAP internet pages, web-offerings, or other online events**

When operating its internet pages, web-offerings, or other online events ("Web-Services"), SAP processes your Personal Data for the following purposes:

- 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.

### **To use Cookies and similar tracking technologies**

SAP processes information including Personal Data about the users of the SAP Discovery Center website using cookies or similar technologies for the purposes set out in [SAP Discovery Center Cookie Statement](#). By visiting the "Cookie Preferences" link in the footer of the SAP Discovery Center homepage (<https://discovery-center.cloud.sap/>), you will find further information and have the option to exercise your cookie preferences.

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

We aim to keep customers and prospects updated on upcoming events and SAP's latest products and services. Further, We also desire to keep Our customers and partners satisfied with Our products and services and therefore ask them on a regular basis for their feedback. If possible, We may contact you to discuss further your interest in SAP services and offerings.

### Feedback requests 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.

## **To provide you with access to SAP Discovery Center**

We require your Personal Data to provide you with access to SAP Discovery Center, and its services like missions, project board and access to product coaches.

### **III. What categories of Personal Data does SAP process?**

#### **Contact Data**

SAP processes the following categories of Personal Data as contact data:

If you use a registration form, SAP will collect the information you provide to SAP, which consists of your first and last name, email addresses, telephone numbers, location (country, state/province, city), company name, job title/role, department and function, current relationship to SAP, and your company's industry. SAP Discovery Center collects and processes some information about you in the context of your professional activities, consisting of your first and last name, email addresses and SAP Community user ID.

SAP processes certain information about your browser (for e.g.: browser name and version), the operating system name and version, device type, and your IP address. For you to successfully logon to SAP Discovery Center, you need to have a valid SAP Business Technology Platform user i.e., a SAP Community user ID is required. While you register for SAP Business Technology Platform, SAP stores certain information about your browser, the operating system, and your IP address.

#### **Personal Data related to statutory law or regulation**

SAP processes certain information about your browser. The operating system name and version, device type, your IP address and user details of authenticated users.

#### **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.

- 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.

#### **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.

### **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.

#### **IV. From What Types of Third Parties does SAP obtain Personal Data?**

In most cases, SAP collects Personal Data from you. SAP might also obtain Personal Data from a third party if the applicable national law allows SAP to do so. SAP will treat this Personal Data according to this Privacy Statement, plus any additional restrictions imposed by the third party that provided SAP with it or the applicable national law.

These third-party sources include:

- SAP and/or SAP Group's business dealings with your employer
- Third parties you directed to share your Personal Data with SAP

#### **V. How long does SAP store your Personal Data?**

SAP does only store your Personal Data for as long as it is required:

- for the performance of SAP Discovery Center Terms of Use.
- to make SAP Discovery Center including service catalogue and estimator available to you.
- to fulfil 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.

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.

#### **VI. Who are the recipients of your Personal Data?**

Your Personal Data will be passed on to the following categories of third parties to process your Personal Data:

- companies within the SAP Group;
- third party service providers; for e.g., for consulting or other services, the provision of the website, the fulfillment and provisioning of offers from SAP or newsletter dispatch.

### **SAP Group entities**

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 [privacy@\[ \]sap.com](mailto:privacy@[ ]sap.com).

### **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.

## **VII. 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 obtain a copy of Personal Data**

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 [privacy@\[ \]sap.com](mailto:privacy@[ ]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 business scenario discussion for adopting Business Technology Platform], you have the right to object to such a use of your Personal Data at any time. For details refer to the above section **“To use Cookies and similar tracking technology”**.

When you object to SAP's processing of your Personal Data for business scenario discussion for adopting Business Technology Platform, 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.

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

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

### **IX. 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.

### **X. Can you use SAP's services if you are a minor**

**Children.** In general, SAP Discovery Center is not directed to users below the age of 16 years, or equivalent minimum age in the relevant jurisdiction. If you are younger than 16 or the equivalent minimum age in the relevant jurisdiction, you cannot register with and use this SAP Discovery Center.

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

### **I. Where SAP is subject to privacy requirements in the EU/EEA or a country with national laws equivalent to the GDPR**

#### **Who is the relevant Data Protection authority?**

You may find the contact details of your competent data protection supervisory authority [here](#). 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.

#### **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:

Where We refer to GDPR Article 6.1 (f), 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 the SAP Discovery Center,
- 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 processing for such purpose. 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 to [privacy@\[sap\].com](mailto:privacy@[sap].com).

### **To comply with statutory obligations**

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

- GDPR Article 6.I (c) if necessary, to fulfill legal requirements under European Union or EU Member State law to which SAP is subject,
- GDPR Article 6.I (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.

### **To 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.I (b) if necessary, to fulfil (pre-)contractual obligations with you,
- GDPR Article 6.I (c) if necessary, to fulfil legal requirements applicable to SAP,
- GDPR Article 6.I (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.I (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.

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

When operating Web-Services") and depending on the respective operating purpose, SAP is processing your Personal Data on the basis of the following legal permissions:

- GDPR Article 6.I (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-Services, answering and fulfilling your requests or instructions, (legitimate interest to efficiently perform or manage SAPs business operation)
- GDPR Article 6.I (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.I (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.

### **To use Cookies and similar tracking technologies**

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.I (a) if it is necessary that We ask you for your consent to process your Personal Data,
- GDPR Article 6.I (b) if necessary to fulfill (pre-)contractual obligations with you,
- GDPR Article 6.I (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.

### **To offer 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.I (a) if your consent is required by law for SAP to process your data for this purpose,
- GDPR Article 6.I (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.

### **To provide you with access to SAP Discovery Center**

When SAP provides you with access to SAP Discovery Center, and its services like missions, project board and access to product coaches, We require your Personal Data, SAP is processing your Personal Data on the basis of the following legal permissions:

- GDPR Article 6.I (a) if your consent is required by law for SAP to process your data for this purpose,
- GDPR Article 6.I (b) if necessary, to fulfil (pre-)contractual obligations with you,
- GDPR Article 6.I (f) if necessary, to maintain Our business relationships, 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,
- a legal permission under other national laws equivalent to any of the above, 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](#).

## **II. Where SAP is subject to privacy requirements in Colombia.**

Colombia-Specific Provisions apply to citizens of the Republic of Colombia.

## **III. Where SAP is subject to the requirements of the Brazilian General Data Protection Law (“LGPD”)**

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

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

## **IV. Where SAP is subject to privacy requirements in the Philippines.**

**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:

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.
- 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.

## **V. Where SAP is subject to privacy requirements in South Africa.**

**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 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.

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, located [here](#).

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.

Phone: 011 325 6000

Address: 1 Woodmead Drive Woodmead Johannesburg South Africa 2148

Email: [privacy@\[sap.com\]](mailto:privacy@[sap.com])

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@\[justice.gov.za\]](mailto:complaints.IR@[justice.gov.za])

Enquires: [infoereg@\[justice.gov.za\]](mailto:infoereg@[justice.gov.za])

## **VI. Where SAP is subject to privacy requirements in the United States of America.**

**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 Discovery Center is 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.

## **VII. Where SAP is subject to privacy requirements in the State of California, USA.**

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

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; and
- 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 sell or share your Personal Data. In the course of our business activities, we may share Personal Data with third parties or permit third parties to collect data across various SAP websites.

#### Data Subject Access Requests:

SAP receives Data Subject Access Requests from across the globe and works to ensure all valid requests where SAP is the Controller are responded to within the appropriate timeframe. 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 [privacy@\[sap.com\]](mailto:privacy@[sap.com]), you may also exercise your rights as follows:

You can call toll-free to submit a request using the numbers provided [here](#). 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.”

### **VIII. Where SAP is subject to privacy requirements in Singapore.**

**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: Data Protection Officer

Email: [privacy@\[sap.com\]](mailto:privacy@[sap.com])

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

Contact: +65 6664 6868