

Effective Date: March 1, 2024

## Welcome!

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 directly or indirectly identify an individual ("personal data").

Respecting your time and with the goal of providing you with the quickest possible access to the relevant passages of the privacy statement, we offer you the following summary.

## Summary

The privacy statement aims to explain **what personal data is processed** by SAP, **who uses your personal data**, for **what purpose**, for **how long**, and explains **what rights you have** in this context.

**Who collects and processes your personal data?** SAP does, in the form of the respective legal entity, being either SAP SE in Walldorf, Germany or any another entity of the global group of SAP companies. The signavio.com Privacy Statement describes in detail which processing activities of which SAP Group Entities apply.

SAP is processing information including personal data about the users of signavio.com using cookies or similar technologies for the purposes set out in the [Cookie Statement](#). You will find further information and have the option to exercise your preferences by clicking on the Cookie Preferences link in the footer of this page.

**What personal data does SAP collect?** SAP may collect various types of personal data about you when conducting its business, including:

- personal contact data,
- personal data related to your or your employer's business relationship with SAP,
- personal data SAP must collect due to legal- and compliance-related purposes,
- personal usage, registration, and participation data which SAP may generate through your use of its web and online offerings,
- special categories of personal data,
- application-related personal data,
- personal data which SAP may receive from third parties,
- personal data SAP requires to ensure your or your employer's satisfaction with our products, services and offerings.

**For what purpose(s) does SAP collect personal data?** SAP processes your personal data to:

- pursue its business relationships with you, your employer, or your employer's customers, including ensuring your satisfaction with and keeping you up to date on the latest news about our products and services,
- develop and offer you its software products, cloud, and other services,
- protect the quality and safety of its premises, facilities, products, or services,

- secure and, if necessary, defend its protected legal assets against unlawful attacks, assert our rights or defend SAP against legal claims,
- ensure compliance with statutory laws and regulations applicable to SAP,
- operate SAP's Internet pages, web offerings, or other online events including analyzing the behavior of the users, enabling you to create a user profile, benefit from an identity service and to promote and continuously improve your user experience,
- search you as a potential talent for SAP,
- transfer it to recipients like other entities of the SAP Group, third-party service providers, SAP partners and others.

If you want to learn more about each of these purposes for which SAP may collect, transfer, and use your personal data, including for **how long** your data is being retained and specific to the General Data Protection Regulation (GDPR), **the legal ground** on which SAP is pursuing them, please refer to the full privacy statement below.

**What are your data protection rights?** You have the right to request from SAP access to, correction of, and/or the return or the deletion of your personal data. You may request from SAP to restrict the access to your personal data or to exclude it from further processing. You may revoke a once given consent or object to processing activities which SAP may intend to pursue in a given case. When you believe that SAP was processing your personal data not in accordance with this privacy statement or under breach of applicable data protection laws, you have the right to lodge a complaint with a relevant supervisory authority. The signavio.com Privacy Statement describes each of these rights in detail, including how you can reach us to exercise any of these rights against SAP and how to identify, if necessary, the relevant data protection authority.

In the final section below, SAP addresses several **country-specific aspects** that must be explained in a privacy statement under relevant country laws. The country-specific requirements include but are not limited to those from the EU and EEA, Australia, Brazil, Canada, Colombia, Malaysia, New Zealand, the Philippines, Singapore, South Africa, South Korea, Thailand and the United States of America.

## SAP Privacy Statement

### Who is the responsible SAP Entity

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 activities 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 by
  - 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.

For what purposes does SAP process your Personal Data and based on what legal basis?

Depending on the applicable law, there must be a justification for processing of personal data, which is sometimes referred to as legal basis. Here are details on both the purpose of processing and the legal basis for doing so.

## **SAP’s compliance 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 may process personal data to create anonymized data sets which may then be used to safeguard and protect SAP systems including data, equipment, facilities and networks.
- 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 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.

When ensuring compliance, SAP processes your personal data if and to the extent necessary to fulfill legal requirements under European Union or EU Member State law to which SAP is subject, and laws and regulations extraterritorial to the EU (legitimate interest to comply with extraterritorial laws and regulations).

### **SAP's operation of Web Services**

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. This may include, without limitation:

- To provide Web Services and functions, create and administer your online account, update, secure, troubleshoot the service, provide support, improve, and develop the Web Services and/or answer and fulfill your requests or instructions.
- To process 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 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.
- 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.
- To register and create a user profile to use certain web offerings linked to SAP's websites, including forums, blogs, and networks (e.g., the SAP Community). 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. 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.
- To create a user profile, which may be specific to a single web offering of SAP or it may also allow you to access other web offerings of SAP or of other entities of the

SAP Group. It is your choice whether to use any of these additional web offerings. If you do, SAP will make your personal data available to such other web offerings 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 so that SAP can provide these services to you.

When operating SAP's Web Services, SAP processes your personal data if and to the extent,

- SAP obtained your consent, if required by law, to process your personal data for this purpose,
- necessary to fulfill (pre-) contractual obligations with you,
- necessary to fulfill legal requirements applicable to SAP,

necessary to pursue SAP's legitimate interest to efficiently perform or manage SAP's Web Services and business operation and assert or defend itself against legal claims. We believe that SAP's 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.

### **SAP's pursuit of business relationships**

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, including:

- 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 ("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.

- Development of products and services: Within an existing business relationship between you or your employer and SAP, 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.
- 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 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 events, 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 postal mail, email, phone or other electronic means about such news if SAP has collected such information in the context of the business relationship or has obtained this information from a publicly available source as far as it is allowed by law or you have consented. 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 communication.
- 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 get in touch with you: To establish new business relationships between SAP and you or your employer, SAP processes your personal data to inform you about SAP events, products or services that have a substantive or material connection to your role or function in your organization. We may also contact you to discuss further your interest in SAP's products or services. SAP will contact you by postal mail, email, phone or other electronic means if you have either consented to such use, or if SAP has obtained your personal data from a publicly available source as allowed by law or to address you for further consent. 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 communication.
- 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 X, 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.

When pursuing its business relationships, including engaging in direct marketing and sales activities, SAP may process your personal data if and to the extent that:

- the contract or pre-contractual relation relates to a company or other legal body and if SAP processes your personal data as Customer Contact and it is necessary
  - to fulfill (pre-) contractual obligations (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 demand or interest, which may also comprise the combination of information 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).
  - When providing you with information about other SAP products and services, we may send them to your email address 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) we inform you in every approach, at any time that you may object to our use of your email address for marketing purposes. We may also send you such information by other electronic means (e.g., telephone, SMS, MMS) to the extent permitted under applicable law or explicit or presumed consent.
- We serve or maintain our business relationships with you, ensure your satisfaction as a user or customer representative, and/or provide you with information about other SAP products and services as indicated by your demand or interest (necessary for the performance of a contract and/or legitimate interest to operate sustainable business relationship with SAP customers and partners).
- We operate to establish a new business relationship with you or your employer and you have consented to SAP's use of your personal data for such marketing purpose or we (i) obtained your email from a publicly available source (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

- Whenever you grant SAP consent that SAP may use your personal data to provide you with additional information on SAP products and services (General Marketing Consent), SAP will process your data as set out in the section above.

### **What categories of 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 partner's 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 academic credentials, 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 possible 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 during an application for a job at SAP: SAP processes personal data of individuals applying for a job at SAP as set out in the privacy statement of the [SAP Career Portal](#).
- 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.

### **From what types of third-parties does SAP obtain Personal Data?**

SAP generally aims to collect personal data directly from the data subjects. If you are requested to provide personal data to SAP and you fail to provide such personal data, kindly note that SAP may not be able to provide you with the respective service and/or business relationship requested. 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 Entities,
- 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 brokers.

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.

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

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. SAP stores 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 develop products or services until this is no longer necessary or SAP is informed that your relationship with the SAP customer has changed;
- 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;

- for SAP to comply with statutory obligations to retain personal data, resulting inter alia e.g., from applicable export, finance, tax or commercial laws;
- until you revoke a consent you previously granted to SAP to process your personal data.

## Who are the recipients of your Personal Data?

- **Entities of the SAP Group:** 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 data protection law, including GDPR.
- **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 with 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.

## What are your data protection rights and how can you exercise them?

SAP honors your statutory rights when it comes to the processing of your personal data. To the extent provided by applicable data protection laws, you have the right to:

- **Access your personal data** that we have on you, or have it updated.
- **Obtain a copy of the personal data** you provided to SAP, if SAP uses your personal data based on your consent or to perform a contract with you. 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 communicate with you how it can best be fulfilled.

- **Delete your personal data** we hold about you. 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.
- **Object to SAP further processing your personal data**, if and to the extent SAP is processing your personal data based on its legitimate interest. When you object to SAP's processing of your personal data, 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 personal data, which may override your interest in objecting, or if SAP requires the information for the establishment, exercise, or defense of legal claims.
- **Object to direct marketing or to apply profiling in relation to direct marketing.** 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.
- **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 or permitted to do so (e.g., if your personal data is needed by SAP to assert or defend against legal claims). In case SAP is required or permitted to retain your personal data for other legal reasons your personal data will be restricted from further processing and only retained for the term required by law or fulfil the other purpose. 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, offer or event to you after your revocation.
- **Not to be subject to a decision based solely on automated means**, if the decision produces legal effects concerning you or significantly affects you in a similar way.
- **Lodge a complaint** to the competent supervisory authority if you are not satisfied with how SAP is processing your personal data. Your competent supervisory authority can be found in the country specific section below.

Depending on applicable local data protection laws, your rights may be subject to deviations, limitations, or exceptions as set out below in the country-specific section. Please be aware, that SAP honors your statutory rights when it comes to the processing of your personal data to the extent provided by applicable data protection laws.

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

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

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

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.

### **Additional country and regional specific Provisions**

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

##### **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?**

You may find the contact details of your competent data protection supervisory authority [here](#). SAP's lead data protection supervisory authority is the Landesbeauftragter für den Datenschutz und die Informationsfreiheit Baden-Württemberg and can be reached at Lautenschlagerstraße 20, 70173 Stuttgart/Germany.

##### **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 and their international perspectives on data protection [here](#).

#### **Where SAP is subject to privacy requirements in Australia**

Your personal data is predominantly stored inside the EEA or in the US, however, your personal data may be processed globally.

#### **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:

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

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

#### **Where SAP is subject to privacy requirements in Canada**

Your personal data may be processed globally. If personal data is processed across country borders, SAP complies with laws of the transfer of personal data between countries to keep your personal data protected. It may, however, based on the laws of such countries be subject to access by local law enforcement.

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

Where SAP is subject to the requirements of the Colombian Statutory Law 1581 of 2012 and Decree 1377 of 2013, the following applies:

Within Colombia you have the right to:

access, update and rectify your Personal Data.

request evidence of your consent.

upon request, receive information about how SAP processes your Personal Data.

lodge a complaint with the Superintendence of Industry and Commerce (“SIC”) about a violation of the applicable laws.

revoke your consent and/or request the deletion of your Personal Data, provided that there is no supervenient legal or contractual obligation that allows SAP to keep your Personal Data in SAP’s databases.

SAP Colombia S.A. may Process your Personal Data by itself or on behalf of the SAP Group, with its main office located at Carrera 9 No 115 – 06, Edificio Tierra Firme Of. 2401 Bogotá D.C., Colombia. You can contact us either by the telephone number +57-6003000 or via email at: webmaster[@]sap.com

SAP will be responsible to answer any requests, questions, and complaints that you might have to your right to access, update, correct and delete your Personal Data, or revoke your consent.

**Where SAP is subject to the requirements of the Malaysian Personal Data Protection Act (“PDPA”)**

Written inquiries, requests or complaints may be addressed to:

Data Protection and Privacy Coordinator for Malaysia

Phone No. 60 3-2202 6000

Email address: privacy[@]sap.com

SAP has implemented technology, security features and strict policy guidelines to safeguard the privacy of users’ personal data. For this privacy statement in Bahasa Malaysia, please click [here](#).

**Where SAP is subject to the privacy requirements of New Zealand,** the following data protection rights apply:

**Right to access and correct**

You can request from SAP at any time access to information about which personal data SAP processes about you and, if necessary, the correction 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.

### **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.

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

Within the Philippines you have the right to:

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.

File a complaint with the National Privacy Commission 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.

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.

For individuals within the Philippines, you may exercise your rights by submitting a request by mail or phone to SAP at:

Address: SAP Philippines, Inc., Attn: Data Protection Officer, 27F Nac Tower,  
Taguig City 1632, Philippines  
Phone:+632-8705-2500

### **Where SAP is subject to the requirements of Singapore's Personal Data Protection Act ("PDPA"), the following 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

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

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

### **Where SAP is subject to the requirements of the South Korea Personal Information Protection Act (“PIPA”)**

Your personal data may be processed globally. When personal data is processed across country borders, SAP complies with laws on the transfer of personal data between countries to keep your personal data protected. Your personal data may be transferred to, accessed or processed by the categories of third-parties as described above.

### **Where SAP is subject to the requirements of the Thailand Personal Data Protection Act (“PDPA”)**

Your personal data may be processed globally. When personal data is processed across country borders, SAP complies with laws on the transfer of personal data between countries to keep your personal data protected. Your personal data may be transferred to, accessed or processed by the categories of third-parties as described above.

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

Where SAP is subject to the requirements of the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Acts of 2020 (CPRA), from here on referred to as “CCPA” or where other US state laws have similar requirements, the following applies:

## **You have the right to:**

Know what personal information the business has collected about the consumer, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom the business discloses personal information, and the specific pieces of personal information the business has collected about the consumer.

Delete personal information that the business has collected from the consumer, subject to certain exceptions.

Correct inaccurate personal information that a business maintains about a consumer.

Opt-out of the sale or sharing of their personal information by the business (where applicable).

Limit the use or disclosure of sensitive personal information by the business (subject to certain exceptions, where applicable).

Receive non-discriminatory treatment for the exercise of these rights.

## **How you can exercise your Data Protection Right(s)**

To exercise these rights, or to limit the Sharing of your Personal Information, please contact us at:

Address: 3999 West Chester Pike, Newtown Square, PA 19073 USA  
Email: [privacy@\[ \]sap.com](mailto:privacy@[ ]sap.com)

In accordance with the verification process set forth under US relevant state law (as appropriate), SAP may 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. You can designate an authorized agent to submit requests to exercise your data protection rights to SAP. The agent must submit authorization to act on your behalf and, where required by relevant law, the agent must be appropriately registered.

**Financial Incentives.** SAP does not offer financial incentives in return for your consent to share your personal information, nor limit service offerings where you opt-out of such sharing (unless sharing is practically necessary to perform the relevant service).

**Children's Privacy.** Given that SAP websites and online services are not directed to users under 16 years of age, SAP does not sell or share the personal information of any minors under 16. If you are a parent or guardian and believe SAP collected information



about your child, please contact SAP. SAP will take steps to delete the information as soon as possible.