PRIVACY STATEMENT

This Privacy Statement was updated on 01st September 2022.

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 "SAP") 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").

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

This Privacy Statement applies to the collection and processing of Personal Data for the purposes of commissioning of freelancers and non-preferred suppliers by

- *SAP SE, Dietmar-Hopp-Allee 16 Walldorf 69190, Germany if you are in a member state of the European Union (EU) or the European Economic Area (EWR) or in any of the countries of Andorra, Faroe Islands, Guernsey, Isle of Man, Jersey, Switzerland, or the United Kingdom or by*
- *SAP America Inc., 3809 West Chester Pike, Suite 200, Newtown Square, PA 19073, USA if you are in any other country, or*
- *a specific SAP group entity as may be stated in the "Additional Country and Regional Specific Provisions" at the end of this Privacy Statement.*

You can reach SAP Group's data protection officer any time at 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.*

III. What categories of Personal Data does SAP process?

Contact Data
SAP processes the following categories of Personal Data as contact data first name, last name,, postal address (country, state/province, city), Email address, telephone number.

Personal Data related to the business relationship with SAP
In the context of established business relationships, SAP processes the business partners company name, industry, your job title and role, department and function and your company's relationship history to SAP.

Personal Data related to statutory law or regulation
If required by statutory law or regulation, SAP may process data categories: first name, last name,, postal address (country, state/province, city), Email address, telephone number.

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.

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 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. How long does SAP store your Personal Data

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

- *to make the access to SAP systems available to you.*
- *for SAP to comply with statutory obligations to retain Personal Data, resulting inter alia e.g. from applicable export, finance, tax or commercial laws.*
- *to fulfill SAP's legitimate business purposes as further described in this Privacy Statement, unless you object to SAP's use of your Personal Data for these purposes.*

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.

V. 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 services providers, e.g. SAPs partner acting as pass through management provider.*

VI. 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 your SAP point of contact at SAPFieldglassProcurement@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, you have the right to object to such a use of your Personal Data at any time.

When you object to SAP's processing of your Personal Data for the purposes of commissioning of freelancers and non-preferred suppliers, 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.

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.

VII. How can you exercise your data protection rights?

Please direct any requests to exercise your rights to the SAP contact person at SAPFieldglassProcurement@sap.com.

VIII. 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.

IX. Can you use SAP's services if you are a minor?

Children. In general, the purposes of commissioning of freelancers and non-preferred suppliers by SAP is not directed to users below the age of 16 years, or equivalent minimum age in the relevant jurisdiction.

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.I (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),*
- *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.*
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If you wish to obtain further information on this approach, please contact SAPFieldglassProcurement@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.*

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

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

- *You may claim compensation as finally awarded by the National Privacy Commission or the courts if you suffered damages due to inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of Personal Data, considering any violation of your rights and freedoms.*
- *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.*

III. 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 (South Africa) Proprietary Limited with registered address at 1 Woodmead Drive, Woodmed (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

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

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001, P.O. Box 31533, Braamfontein, Johannesburg, 2017
Email: complaints.IR@justice.gov.za
Enquires: inforeg@justice.gov.za

IV. 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 procurement of services 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.

V. 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 SAPFieldglassProcurement@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."

VI. 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: SAPFieldglassProcurement@sap.com
Address: Mapletree Business City, 30 Pasir Panjang Rd, Singapore 117440
Contact: +65 6664 6868