

This Privacy Statement was created on April 28, 2021.

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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. This Privacy Statement outlines how we handle information that can be used to directly or indirectly identify an individual.

Data Controller. The data controller for Personal Data (as defined below) provided or otherwise used in relation to the SAP procurement process (or, the SAP Third-Party Risk Management process ("TPRM")) is SAP SE, Dietmar-Hopp-Allee 16, 69190 Walldorf, Germany ("SAP") and its data protection officer can be reached at [privacy\[@\]sap.com](mailto:privacy[@]sap.com).

Categories of personal data. If you interact with SAP in connection with TPRM, SAP will collect your name, title/position and email address (together your "**Personal Data**").

Why does SAP need your Personal Data? SAP requires your Personal Data to send you emails related to TPRM and thereby to enable SAP to conduct a throughout supplier due diligence. Although providing Personal Data is voluntary, without your Personal Data, it is not possible (i) for the company you work for to complete the TPRM and therefore (ii) to enable the company you work for as a supplier of SAP and its affiliates. Any of SAP's use of your Personal Data hereunder in connection with TPRM is required for SAP's legitimate interest to conduct a throughout supplier due diligence (Article 6 para. 1 f GDPR).

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

How long will SAP store your Personal Data? SAP will only store your Personal Data for as long as it is required for the company you work for to participate in TPRM or until you object to SAP's further use of your Personal Data as stated in this Privacy Statement. SAP will also retain your Personal Data for additional periods if it is required by mandatory law to retain your Personal Data longer or where your Personal Data is required for SAP to assert or defend 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.

Who are the recipients of your Personal Data and where will it be processed?

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

- companies within the SAP Group; and
- third party service providers; for e.g., support/ consulting services and other additional related services.

As part of a global group of companies operating internationally, SAP has affiliates (the “**SAP Group**”) and third-party service providers outside of the European Economic Area (the “**EEA**”) or from a region with a legal restriction on international data transfers and will transfer your Personal Data to countries outside of the EEA. If these transfers are to a country for which the EU Commission has not issued an adequacy decision, SAP uses the EU standard contractual clauses to contractually require that your Personal Data receives a level of data protection consistent with the EEA. You can 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 can also obtain more information from the European Commission on the international dimension of data protection here: [European Commission](#).

What are your data protection rights? You can request from SAP: access at any time to information about which Personal Data SAP processes about you and 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. Kindly note further that if you request that SAP deletes your Personal Data, the company you work for will not be able to continue to participate in TPRM and can therefore not act as a supplier of SAP.

You can at any time object to SAP’s use of your Personal Data as set forth in this Privacy Statement by sending an email to the below email address. In this case, SAP will carefully review your objection and cease further use of the relevant information (which will have the same effects on your company’s participation in TPRM as set out in the paragraph above), subject to SAP’s compelling legitimate grounds for continued use of the information, which override your interest in objecting, or if SAP requires the information for the establishment, exercise or defense of legal claims.

Furthermore, you can request from SAP that SAP restricts your Personal Data from any further processing in any of the following events: (i) you state that the Personal Data SAP has about you is incorrect, subject to the time SAP requires to check the accuracy of the relevant Personal Data, (ii) there is no legal basis for SAP processing your Personal Data and you demand that SAP restricts your Personal Data from further processing, (iii) SAP no longer requires your Personal Data but you state that you require SAP to retain such data in order to claim or exercise legal rights or to defend against third party claims, (iv) in case you object to the processing of your Personal Data by SAP based on SAP’s legitimate interest (as further set out herein), subject to the time required for SAP to determine whether it has a prevailing interest or legal obligation in processing your Personal Data.

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

SAP will take steps to ensure that 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 or fraudulent.

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 lodge a complaint with the data protection authority of the EEA country where you live or with the data protection authority of the country or state where SAP has its registered seat.