

SAP solutions to accelerate your GDPR journey

How **SAP & Natuvion Solutions, Services & Expertise** Support your **Journey to Compliance**

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PUBLIC



Agenda

- **Introduction and Expectation Setting**
- **Chances and Challenges of the new GDPR**
- **Insight into capabilities that support you for your GDPR Initiative in a SAP Business Suite centric landscape**
- **Beyond the SAP Business Suite – Discover and Document your non-SAP Landscape**
- **Questions and Answers, Discussion and Next Steps**

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Chances and Challenges of the new **GDPR**



Crisis → **weiji 危机** Chance → **jihui 机会 / 机** → Opportunity **危** → Threat with a turn for the better

Challenges

Implementation effort is significant,
broad, and complex



Initial effort to assess current status versus regulatory requirements and resulting gaps



Change management (organizational, policies, procedures, training, and communication...)



Prescribed data management: internal and external data, privacy by design, consent, storage, access, usage, retention, deletion



Sustainability and ongoing cost of the program—GDPR becomes “business as usual” once it becomes effective

Opportunities

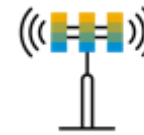
Better governance and data management
improve business outcomes



Create strong framework and processes to mitigate risks and support compliance (for GDPR and others), with controlled costs



Improve depth and breadth of policies and procedures with clear accountability



Embrace innovations like Big Data and the Internet of Things (IoT) with built-in data protection and privacy



Improve confidence of business partners in the protection and security of their data, boosting business relations and your brand image

How we get fit for the **EU Data Protection Regulation**



SAP takes you beyond GDPR compliance

Data Privacy and Protection @SAP

The protection of personal data and privacy are part of our DNA. We protect the rights of our customers, employees, applicants, suppliers, partners and more. When we process and use data, we protect it, retain its ownership, and preserve the privacy of the person to whom it belongs.

We are committed to ensuring compliance with the new EU GDPR as a company until May 2019. In addition, we aim to develop products and services that help customers meet their needs.



A Data Protection Officer (DPO), a Data Protection Management System (DPMS) and a Procedure Enrollment Tool (PET) - these are just a few of the measures we have put in place to prepare for compliance with the GDPR and provide the best possible support to our customers.

[Learn more about SAP and GDPR](#)

[SAP Cloud Trust Center](#)

**Insight into capabilities that support you for your GDPR Initiative
in a **SAP Business Suite centric** landscape**



SAP solutions to accelerate your GDPR
journey

Data Privacy within SAP Business Suite & S/4 HANA & S/4 HANA

Requirements and implementation approaches





Carla Customer
Rainbowstreet 1
39761 Cloud city

Payment condition

Allcreditbank

IBAN: DE12500903170648489890

Communication

+49 610 9607207

Portal Account: CarCus

Contract for work

Working student

(04.2011 – 03.2014)

Contract for work

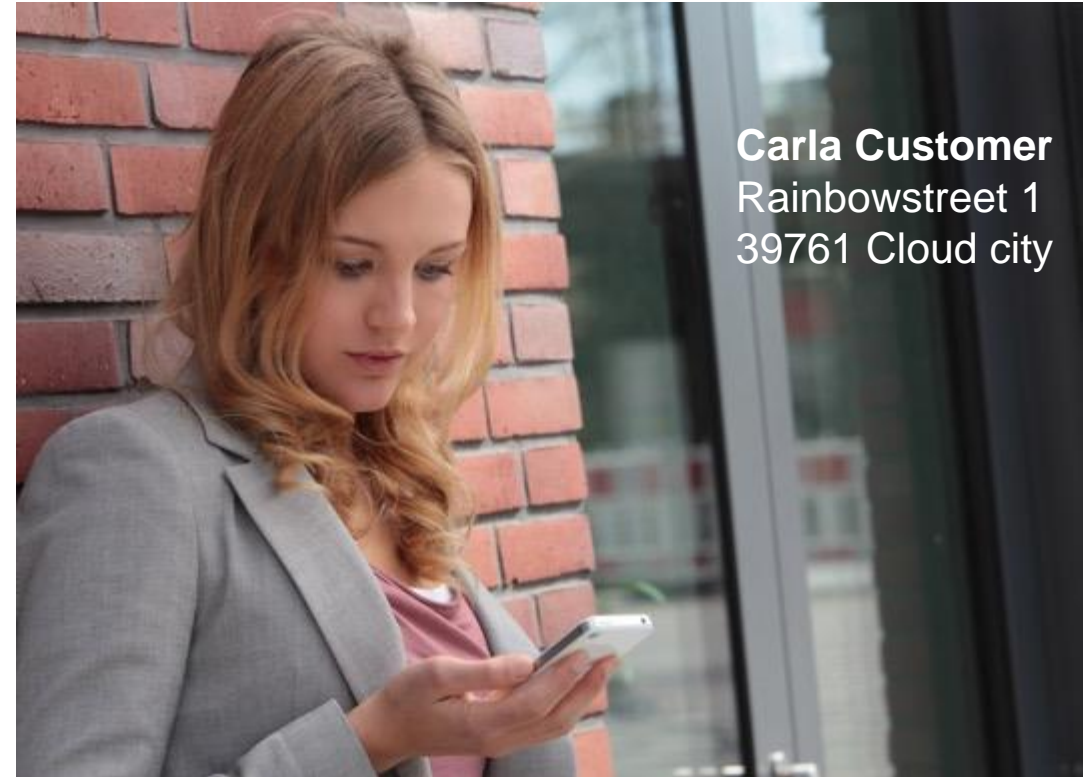
Targeted marketing with Beacons
and Geofencing (12.2015)

Ordered items

- iPhone + maintenance contract (3.2015)
- The Divine Comedy – Alighieri, D. (1.2016)

Type of Business Relationship = Purpose of Processing?

- Obviously, there are very different **business relationships** with Carla Customer, which partly necessitate other residence needs and retention periods.
- Maybe it makes sense to regard the different **business relationships** as **different purposes** as well.
- In many cases, **master data** is data whose purpose depends on other purposes.



Data Privacy within SAP Business Suite & S/4 HANA

Technical implementation: 1. Inventory, blocking and deletion

	Processing purpose	Processing	Blocking
Master data	Dependent on other processing purposes	With related data	Until end of purpose of all related data → in this example probably pension legislation
Payment data	Dependent on other processing purposes	With related data	Until end of purpose of all related data → in this example probably tax legislation
Communication data	Dependent on other processing purposes	With related data	Factual with master data
Marketing	Marketing	Until revocation of consent or missing renewal after x years	None
Sales contract data iPhone & service	Processing sales contract Processing service contract	Up to end of service contract rights	Until end of purpose of all related data → e.g. tax legislation
Sales contract data „The Divine Comedy“	Processing sales contract	During processing of sales contract/ if necessary reporting purposes	Until end of purpose of all related data → e.g. tax legislation
Data contract for work	Processing contract for work	During processing of contract for work/ if necessary reporting purposes	Until end of purpose of all related data → e.g. contract legislation
Data contract of employment	Processing employment relationship	During employment relationship and processing of termination	Attention: periods of pensions, health insurance, health and safety...

The “Right to be forgotten” for Personal Data?

SAP supports
our SAP
Business Suite
Customers with
the ILM –
Retention
Management
for the “right to
be forgotten”

Article 16

Right to erasure (‘right to be forgotten’)

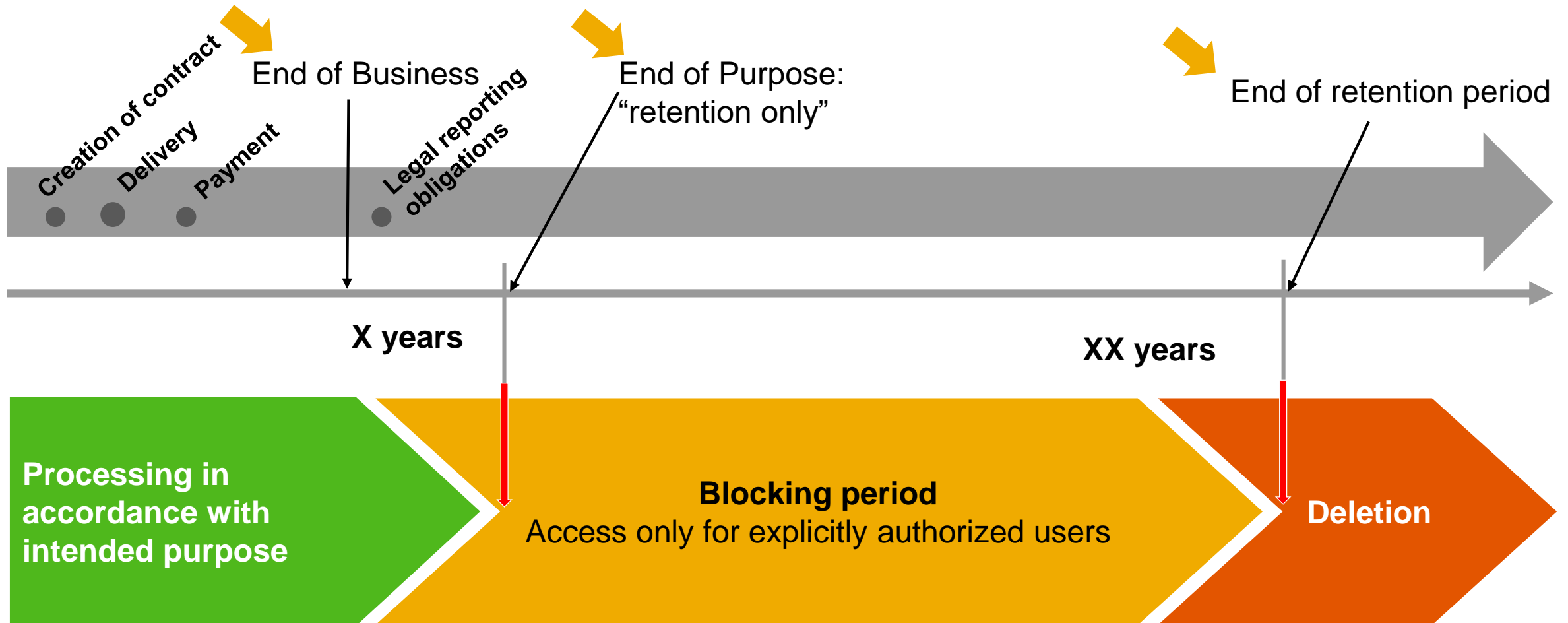
The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay.

ILM – Retention Management for
Personal Data

ILM object including Personal
data

ILM Residence & Retention
Rules

Schema: Personal data lifecycle



Requirement

As soon as the **original purpose ends**, personal data has to be **deleted**.
However, if **other retention periods apply**, the data has to be **blocked**.

SAP Information Lifecycle Management – Retention Management

Core Features

Manage and enforce retention policies

- Set policies for automatic data retention and subsequent destruction
- Retain data according to set policy
- Responsibly destroy data when expiration date has been reached

Maintain archives according to retention policy

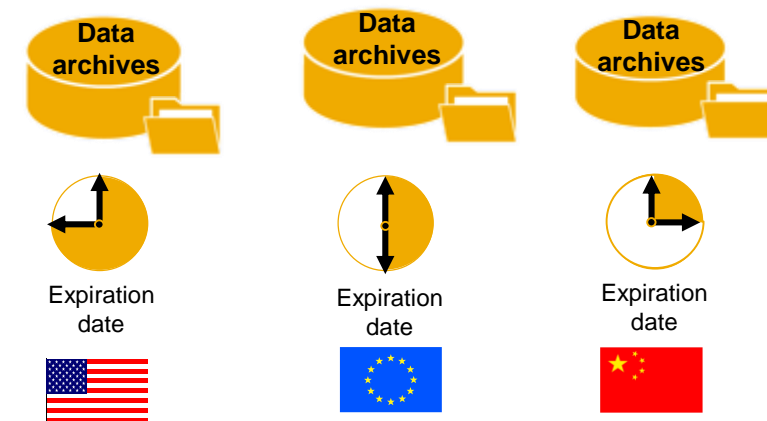
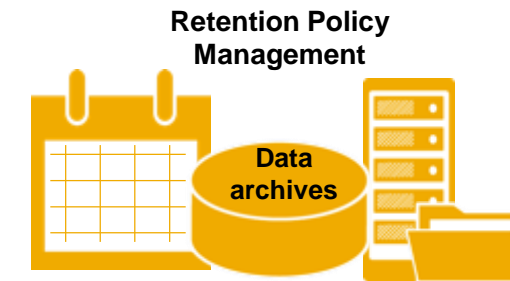
- Create archive files according to rule matching data values and expiration date

Perform e-Discovery

- Search for information in response to legal requests

Apply legal hold on data

- Automatically prevent data deletion or destruction
- Apply holds to archives and database



Definition of Residence and Retention Rules - IRMPOL

Policy Category Residence Rules Audit Area BUPA_DP Object Category SAP Business Suite ILM Object Vendor Master Data

[Edit](#) [Back](#)

Policies

[Change Status](#) [Transport](#) [Export](#) [Import](#) [Overview](#)

<input checked="" type="checkbox"/>	Policy Name	Policy Status	Object in Audit Area	Changed on	Changed by	Comment
<input checked="" type="checkbox"/>	ZAA_TEST01	Not Live	<input type="checkbox"/>	02.10.2017	D026473	

Rules for Policy ZAA_TEST01

<input type="checkbox"/>	Company Code	To	Account group	To	Plant	To	Country	To	Residence Time	Residence Time Unit	Time Ref.	Time Offset	Rule Priority
<input type="checkbox"/>	1000	3000					DE	DE	2	Year	End of Fiscal Year		
<input type="checkbox"/>	1000	3000					US	US	2	Year	Start of Retention Period		

[Change Status](#) [Transport](#) [Export](#) [Import](#) [Overview](#)

<input checked="" type="checkbox"/>	Policy Name	Policy Status	Object in Audit Area	Changed on	Changed by	Comment
<input checked="" type="checkbox"/>	ZAA_TEST02	Not Live	<input type="checkbox"/>	02.10.2017	D026473	

Rules for Policy ZAA_TEST02

[+ Add](#) [Check](#)

<input type="checkbox"/>	Company Code	To	Account group	To	Country	To	Application Name	To	Min. Retent. Time	Max. Retention Time	Retention Time Unit	Time Ref.	Time Offset	ILM Store	Rule Priority
<input type="checkbox"/>	1000	1000								10	Year	End of Fiscal Year		ILMRM	
<input type="checkbox"/>	2000	2000								7	Year	End of Fiscal Year		ILMRM	
<input type="checkbox"/>	3000	3000								15	Year	Start of Retention Period		ILMRM	

Customizing Example: Absences

Definition of archiving Subobjects

For Absences archiving Subobjects can be created

- In this example: vacation and sick leave

The screenshot shows the SAP configuration interface for archiving subobjects. The main window is titled "Sicht 'Archivierungsteilobjekt' anzeigen: Übersicht". It features a "Dialogstruktur" tree on the left with "Archivierungsteilobjekt" and "Abwesenheitsarten" expanded. The main area shows the configuration for "ArchivObjekt HRTIM_ABS".

Archivierungsteilobjekt

Archivierungsteilobj.	ArchivTeilobj. Text
ILLNESS	Krankheit
VACATION	Urlaub

Archivierungsteilobjekt ILLNESS

GrPTB	AbAnArt	An-/AbwArtText
1	0200	Krankheit mit Attest

Archivierungsteilobjekt VACATION

GrPTB	AbAnArt	An-/AbwArtText
1	0100	Urlaub
1	0101	Urlaub IT 0005
1	0190	Bildungsurlaub

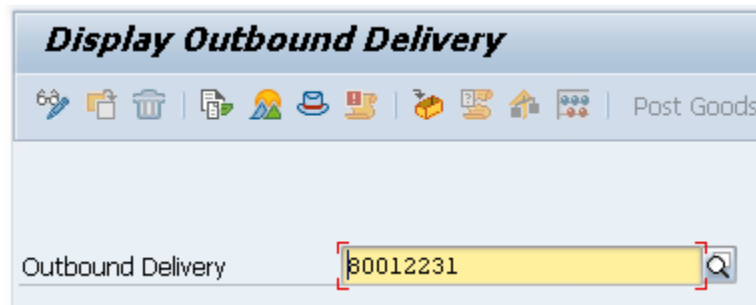
Customizing Example: Absences

Definition of Retention Rules

Regelwerk-Viewer						
[Icons]						
Kommentar zu einer Regel	Archivierungssteilobjekt	Mitarbeiterkreis	Beschäftigung	Maximale Aufbewahrungsfrist	Einheit Aufbew.Frist	Aufbewahrungsfrist beginnt mit
§ 107f Abs. 2 HBG ("Beschäftigte öD")	ILLNESS	OH		3	ANN	END_OF_YEAR
§ 90f Abs. 2 BBG ("Beamte")	VACATION	OB		5	ANN	END_OF_YEAR
Ausgetretene			0	10	ANN	END_OF_YEAR

- For sick leaves of employees (object Illness) the data will be destroyed after 3 years, starting end of year.
- For vacation of a public officer (object vacation) the data will be destroyed after 5 years, starting end of year.
- For all employees, who left the company the data will be destroyed after 10 years.

Display outbound deliveries archived for blocking purposes (transaction VL03N) – users with check authorizations



Delivery 80012231 Display: Overview

Outbound deliv.: 80012231 | Document Date: 30.01.2003 | Archived

Ship-To Party: 2402 | Jashanmal International Trading Co / PO Box 3428 / . Dubai

Planned GI: 06.02.2003 00:0... | Total Weight: 5.040 KG

Actual GI date: 30.01.2003 00:00 | No.of packages: 0

Itm	Material	Deliv. Qty	Un	Description
10	P-103	18	PC	Pump PRECISION 103

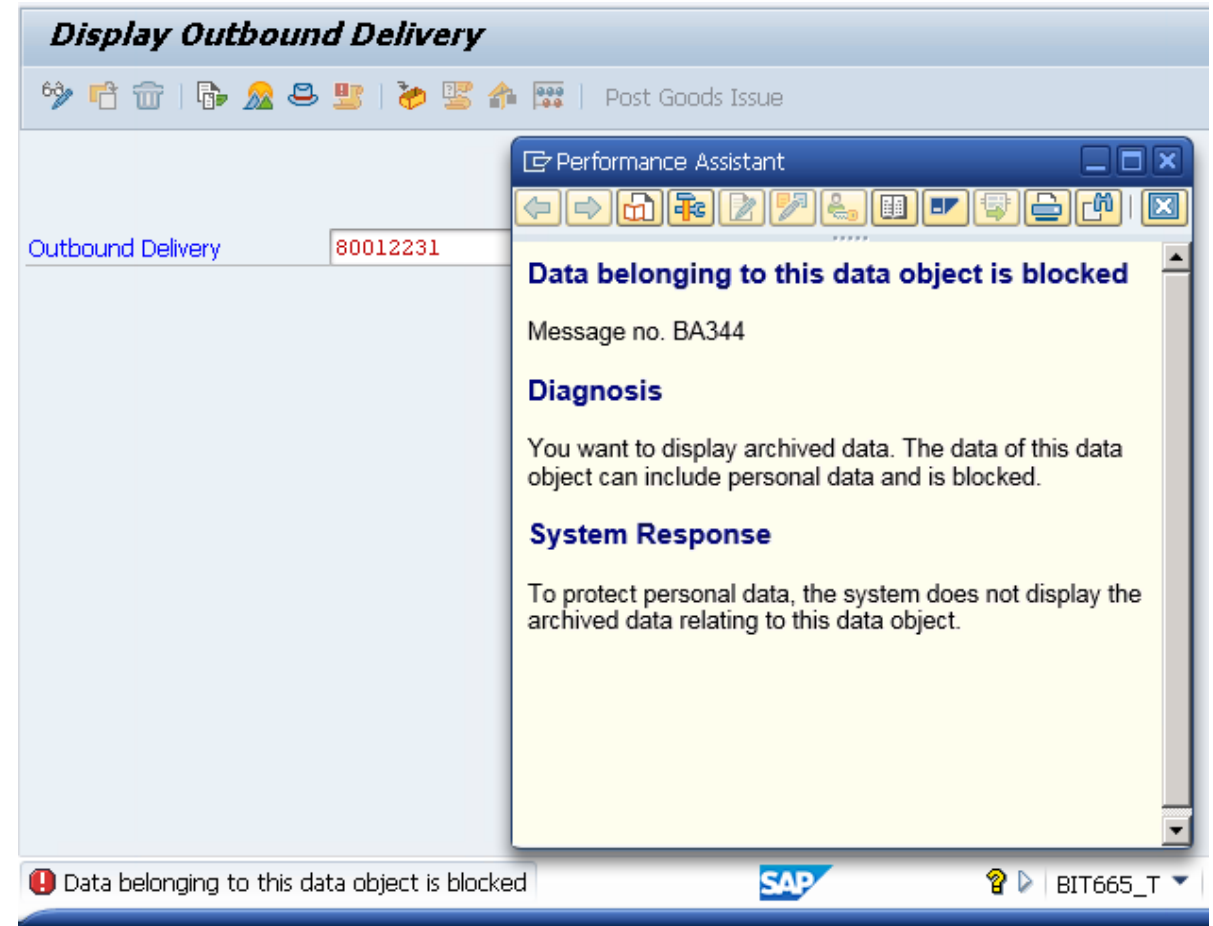
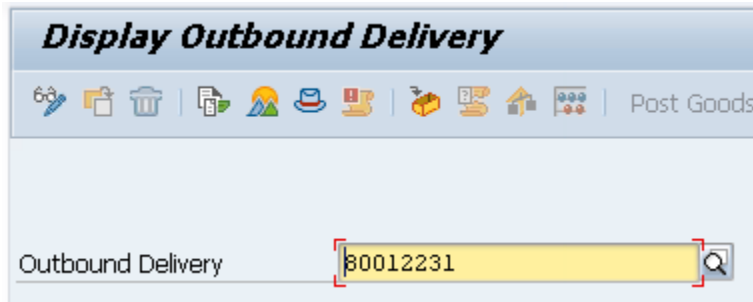
Batch Split | Main items | All items

⚠ Delivery 80012231 read from the archive

SAP | BIT665_A



Display outbound deliveries archived for blocking purposes (transaction VL03N) – users without check authorizations



Display FI documents (not archived) for blocked customers

User without auditor authorization

Display Document: Initial Screen

Document List | First Item | Editing Options

Keys for Entry View

Document Number	1800000000
Company Code	1000
Fiscal Year	2017



Display Document: Data Entry View

Display Currency | General Ledger View

Data Entry View

Document Number	1800000000	Company Code	1000	Fiscal Year	2017
Document Date	06.07.2017	Posting Date	06.07.2017	Period	7
Reference		Cross-Comp.No.			
Currency	EUR	Texts exist	<input type="checkbox"/>	Ledger Group	

Display Document: Data Entry View

Display Currency | General Ledger View

Data Entry View

Document Number	1800000000	Company Code	1000	Fiscal Year	2017
Document Date	06.07.2017	Posting Date	06.07.2017	Period	7
Reference		Cross-Comp.No.			
Currency	EUR	Texts exist	<input type="checkbox"/>	Ledger Group	

Co...	Itm	PK	S	Account	Description	Amount	Curr.	Tx
1000	2	50		62110	Secured Bank Loans,	5.000,00-	EUR	



Missing Authorizations

Missing authorizations for following line item(s):
100018000000000-001;

Display remaining items?

Yes No



Destruction of data from the database / the archive

- Data destruction is triggered manually
- Display of the archive files to be deleted
- The deletion run is scheduled

Data Destruction

Type of Data to Be Destroyed

- Archive Files (ADK)
- Attachments and Print Lists
- Data from the Database

Restrictions

ILM Object _____ to _____

SAP System _____ to _____

Client _____ to _____

SAP ILM_DESTRUCTION zmetdc00

Data Destruction

Job Overview | Logs | Destruction Runs | Automated Destruction Worklist

Expired Resources | Expiration...

zme	
800	
ad	
rv_likp	
lf	
20031231	
Legal Hold	
001884	
001884-001	14.06.2016
Minimum	
001885	
001885-001	14.06.2016
001886	
001886-001	14.06.2016
Maximum	
001887	
001887-001	14.06.2016
001888	
001889	
001890	
001891	
001892	

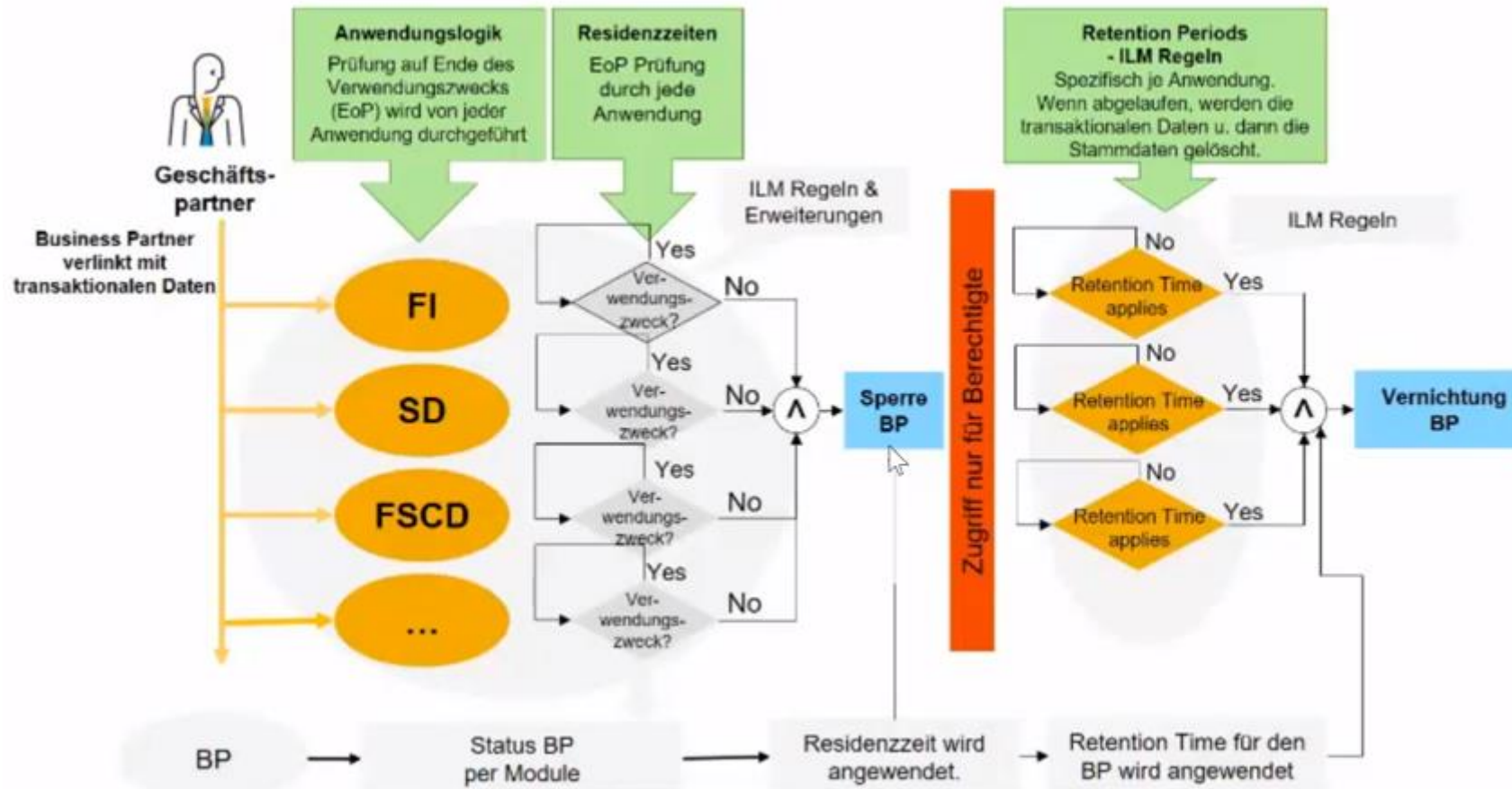
Creation of Destruction Worklist

URI of a Resource

Destruction Worklists

User Name	Date	Time	Text
-----------	------	------	------

Synchronisation of End-of-Purpose and End-of-Retention checks across the SAP landscape



The “Right to be forgotten” for Personal Data?

SAP supports our SAP Business Suite Customers with the ILM – Retention Management for the “right to be forgotten”

Article 16
Right to erasure (‘right to be forgotten’)
The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay.

ILM – Retention Management for Personal Data

ILM object including Personal data

ILM Residence & Retention Rules

The definition of ILM retention and residence and retention rules can get multi-dimensional taking into account different purposes for different Data controllers.

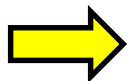
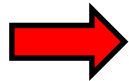
Data Controller Rule Framework

SAP offers a Data Controller Rule Framework

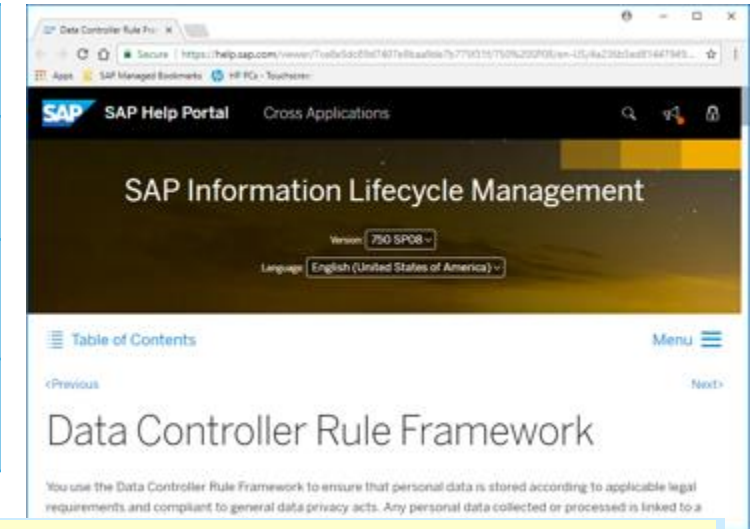
SAP Data Controller Rule Framework

Source:

<https://help.sap.com/viewer/f3b1d0fcc2e042a0bddf01553952465f/750%20SP08/en-US/83ca47b40e5f418799e30255c037a0d8.html>



Purpose	Data Controller	Retention period
Order to Cash Processing	SAP SE Germany	6 years
Order to Cash Processing Medicine	SAP SE Germany	30 years
Order to Cash Processing	SAP SE France	10 years



ILM object	ILM condition field related to business purpose	Value in IRMPOL	ILM condition field related to responsible organization	Value in IRMPOL	Retention Period
SD_VBAK	AUART Sales Document	Not required, applies to all values	VKORG Sales Organization	FR01	10 Years
RV_LIKP	LFART Delivery	Not required, applies to all values	VKORG Sales Organization	FR01	10 Years
MM_MATBEL	VGART Transaction	Not required, applies to all values	WERKS Plant	FR01	10 Years
SD_VBRK	FKART Billing	Not required, applies to all values	BUKRS Company Code	FR01	10 Years
FI_DOCUMNT	BSCHL Posting Key	Not required, applies to all values	BUKRS Company Code	FR01	10 Years

Information Lifecycle Management – Guide for Customers

<https://www.sap.com/products/information-lifecycle-management.html>

Comply with regulations for data retention with information lifecycle management

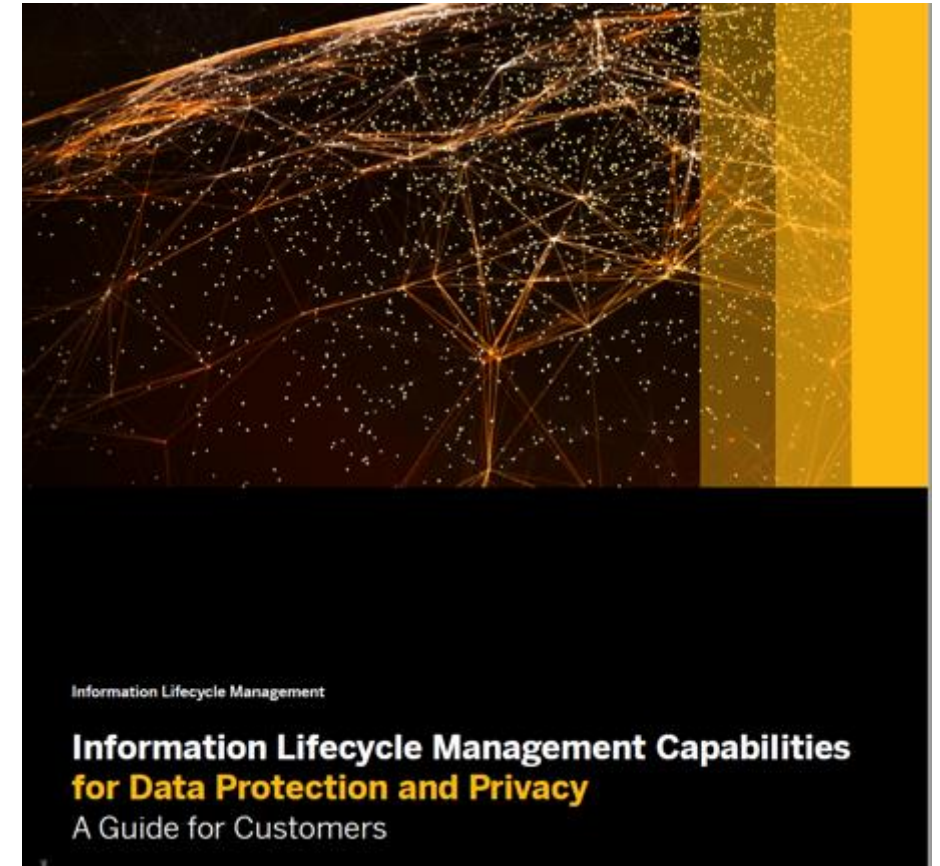
Improve system availability and performance by archiving data to readily accessible storage. Our information lifecycle management (ILM) software can help streamline your IT infrastructure by decommissioning legacy systems and automating data retention according to rules you define minimizing risk with control over your data.



- ✓ Archive obsolete data to enhance performance – and reduce database size and administration costs
- ✓ Support data retention rules by creating separate archives based on varying data lifetimes
- ✓ Reduce IT management costs by consolidating systems and decommissioning legacy systems
- ✓ Preserve compliance auditing and reporting capabilities for decommissioned systems
- ✓ Reduce the cost and risk of legal discovery by automating data collection for legal cases

Learn how SAP ILM and SAP NetWeaver can help your business with EU GDPR and similar data protection and privacy regulations

[Read the customer guide](#)



<https://www.sap.com/products/information-lifecycle-management.html#pdf-asset=76cf31b1-047d-0010-87a3-c30de2ffd8ff&page=1>

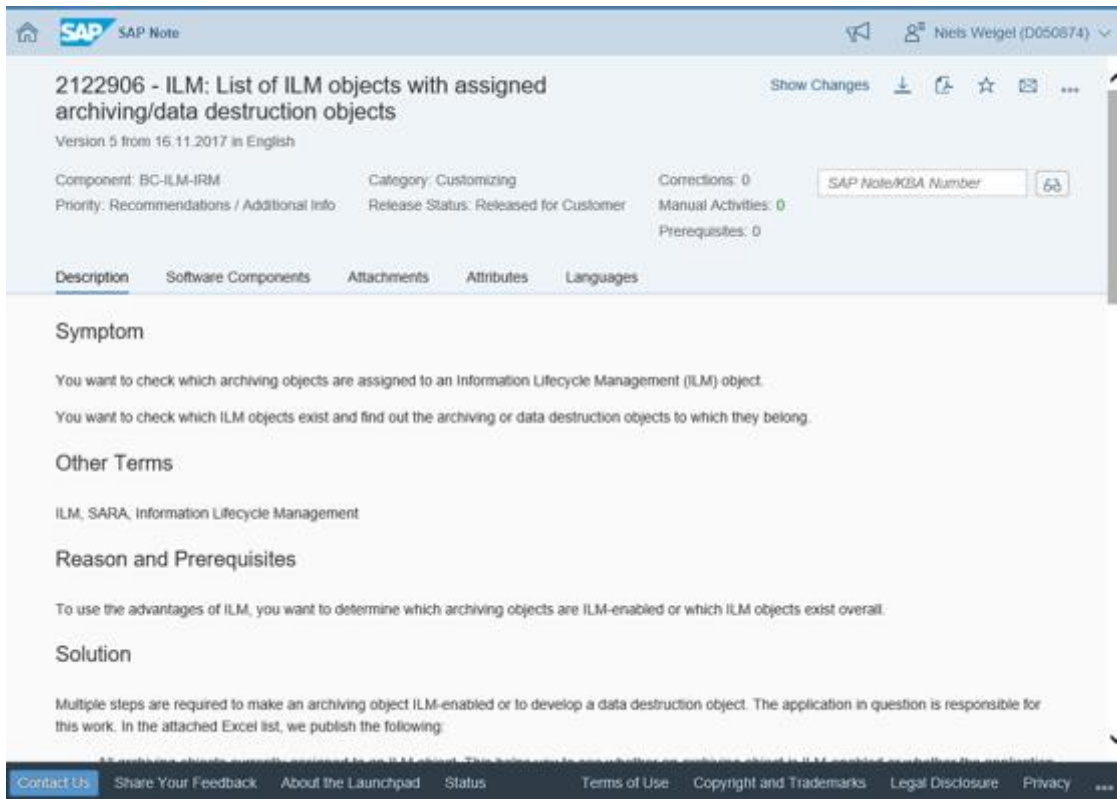
Information Lifecycle Management – Guide for Customers

<https://www.sap.com/germany/documents/2019/07/bcb1b4a1-0e7d-0010-87a3-c30de2ffd8ff.html>



- 3 **Datenschutz und die Rolle von SAP-Lösungen**
- 3 Zweck dieses Dokuments
- 4 **Die Funktionen von SAP Information Lifecycle Management (SAP ILM)**
- 5 Warum die Funktionen Sperren und Löschen so wichtig sind
- 5 SAP NetWeaver: integrierte Funktionen für den Datenschutz
- 6 SAP ILM: integrierte Funktionen für den Datenschutz
- 7 **Erste Schritte mit den Funktionen für Sperren und Löschen**
- 7 Vorbereitung
- 10 Konfiguration
- 11 Ausführung
- 12 **Lizenzbedingungen**
- 13 **Weitere Informationen, Schulungen, Services und Hilfen**

List of ILM objects



The screenshot shows the SAP Note 2122906 interface. The title is "2122906 - ILM: List of ILM objects with assigned archiving/data destruction objects". It includes a version number (5 from 16.11.2017 in English), component (BC-ILM-IRM), category (Customizing), and release status (Released for Customer). The description section contains the following text:

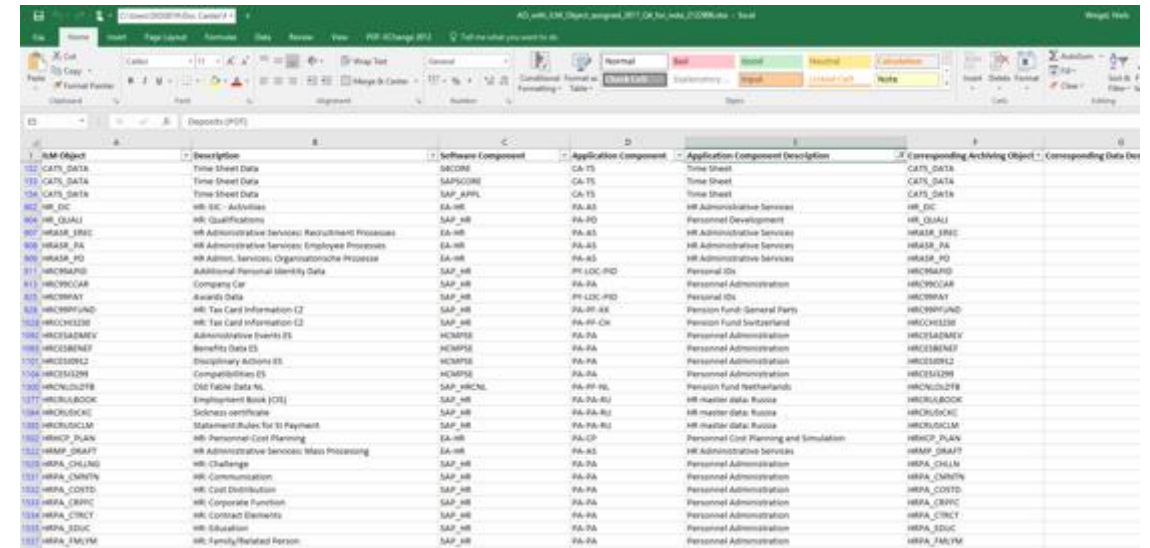
Symptom
You want to check which archiving objects are assigned to an Information Lifecycle Management (ILM) object.
You want to check which ILM objects exist and find out the archiving or data destruction objects to which they belong.

Other Terms
ILM, SARA, Information Lifecycle Management

Reason and Prerequisites
To use the advantages of ILM, you want to determine which archiving objects are ILM-enabled or which ILM objects exist overall.

Solution
Multiple steps are required to make an archiving object ILM-enabled or to develop a data destruction object. The application in question is responsible for this work. In the attached Excel list, we publish the following:

Includes XLS Lists with detailed Information



The screenshot shows an Excel spreadsheet with columns for ILM Object, Description, Software Component, Application Component, Application Component Description, Corresponding Archiving Object, and Corresponding Data Object. The table lists various ILM objects and their associated data objects.

ILM Object	Description	Software Component	Application Component	Application Component Description	Corresponding Archiving Object	Corresponding Data Object
112 CATS_DATA	Time Sheet Data	SAPCR6	CA-TS	Time Sheet	CATS_DATA	CATS_DATA
113 CATS_DATA	Time Sheet Data	SAPCR6	CA-TS	Time Sheet	CATS_DATA	CATS_DATA
114 CATS_DATA	Time Sheet Data	SAPCR6	CA-TS	Time Sheet	CATS_DATA	CATS_DATA
807 HR_DIC	HR SIC Activities	EA-HR	PA-AS	HR Administrative Services	HR_DIC	HR_DIC
808 HR_DIAU	HR Qualifications	SAP_HR	PA-RO	Personnel Development	HR_DIAU	HR_DIAU
809 HRMGR_SERV	HR Administrative Services: Recruitment Processes	EA-HR	PA-AS	HR Administrative Services	HRMGR_SERV	HRMGR_SERV
810 HRMGR_PA	HR Administrative Services: Employee Processes	EA-HR	PA-AS	HR Administrative Services	HRMGR_PA	HRMGR_PA
811 HRMGR_PD	HR Admin. Services: Organizational Processes	EA-HR	PA-AS	HR Administrative Services	HRMGR_PD	HRMGR_PD
812 HRMGR_PIB	Additional Personal Identity Data	SAP_HR	PI-LOC-PIB	Personal ID	HRMGR_PIB	HRMGR_PIB
813 HRMGR_CAR	Company Car	SAP_HR	PA-RA	Personnel Administration	HRMGR_CAR	HRMGR_CAR
814 HRMGR_PAT	Awards Data	SAP_HR	PI-LOC-PIB	Personal ID	HRMGR_PAT	HRMGR_PAT
815 HRMGR_PUND	HR: Tax Card Information (2)	SAP_HR	PA-PP-KE	Person Fund-General Parts	HRMGR_PUND	HRMGR_PUND
816 HRMGR_PUND	HR: Tax Card Information (2)	SAP_HR	PA-PP-CK	Person Fund-Switzerland	HRMGR_PUND	HRMGR_PUND
817 HRMGR_PUND	Administrative Privileges ES	HRMGR_PUND	PA-PA	Personnel Administration	HRMGR_PUND	HRMGR_PUND
818 HRMGR_PUND	Benefits Data ES	HRMGR_PUND	PA-PA	Personnel Administration	HRMGR_PUND	HRMGR_PUND
819 HRMGR_PUND	Disciplinary Actions ES	HRMGR_PUND	PA-PA	Personnel Administration	HRMGR_PUND	HRMGR_PUND
820 HRMGR_PUND	Competibilities ES	HRMGR_PUND	PA-PA	Personnel Administration	HRMGR_PUND	HRMGR_PUND
821 HRMGR_PUND	DM Table Data NL	SAP_HRNL	PA-PP-NL	Person Fund-Netherlands	HRMGR_PUND	HRMGR_PUND
822 HRMGR_PUND	Employment Bank (EL)	SAP_HR	PA-PA-RU	HR master data: Russia	HRMGR_PUND	HRMGR_PUND
823 HRMGR_PUND	Sickness certificate	SAP_HR	PA-PA-RU	HR master data: Russia	HRMGR_PUND	HRMGR_PUND
824 HRMGR_PUND	Statement Rules: Tax 11 Payment	SAP_HR	PA-PA-RU	HR master data: Russia	HRMGR_PUND	HRMGR_PUND
825 HRMGR_PUND	HR: Personnel Cost Planning	EA-HR	PA-CP	Personnel Cost Planning and Simulation	HRMGR_PUND	HRMGR_PUND
826 HRMGR_PUND	HR: Administrative Services: Mass Processing	EA-HR	PA-AS	HR Administrative Services	HRMGR_PUND	HRMGR_PUND
827 HRMGR_PUND	HR: Challenge	SAP_HR	PA-PA	Personnel Administration	HRMGR_PUND	HRMGR_PUND
828 HRMGR_PUND	HR: Communication	SAP_HR	PA-PA	Personnel Administration	HRMGR_PUND	HRMGR_PUND
829 HRMGR_PUND	HR: Cost Distribution	SAP_HR	PA-PA	Personnel Administration	HRMGR_PUND	HRMGR_PUND
830 HRMGR_PUND	HR: Corporate Function	SAP_HR	PA-PA	Personnel Administration	HRMGR_PUND	HRMGR_PUND
831 HRMGR_PUND	HR: Contract Elements	SAP_HR	PA-PA	Personnel Administration	HRMGR_PUND	HRMGR_PUND
832 HRMGR_PUND	HR: Education	SAP_HR	PA-PA	Personnel Administration	HRMGR_PUND	HRMGR_PUND
833 HRMGR_PUND	HR: Family/Related Person	SAP_HR	PA-PA	Personnel Administration	HRMGR_PUND	HRMGR_PUND

Source: SAP Note 2122906

<https://launchpad.support.sap.com/#/notes/2122906>

What is beyond the “Right to be forgotten” for Personal Data?

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ILM – Retention Management for Personal Data

ILM object including Personal data

ILM Residence & Retention Rules

Article 15
Right of access by the data subject
 The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed.

Information Retrieval Framework

ILM object & Business Suite Data Model Information

Article 20
Right to data portability
 The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

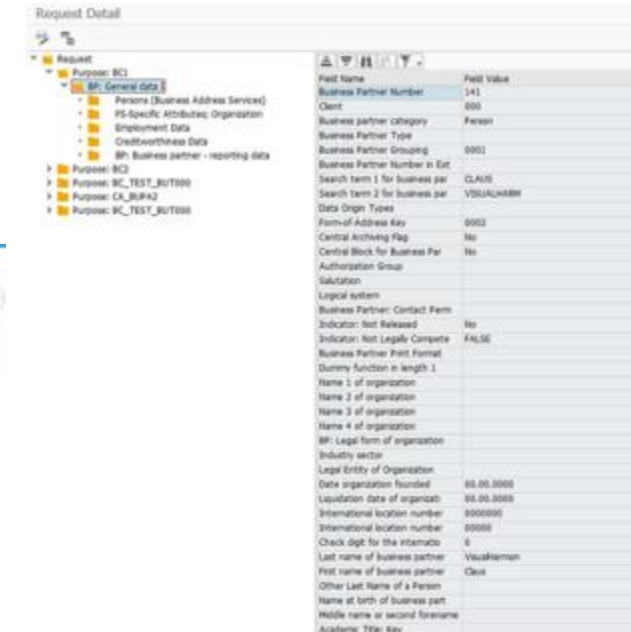
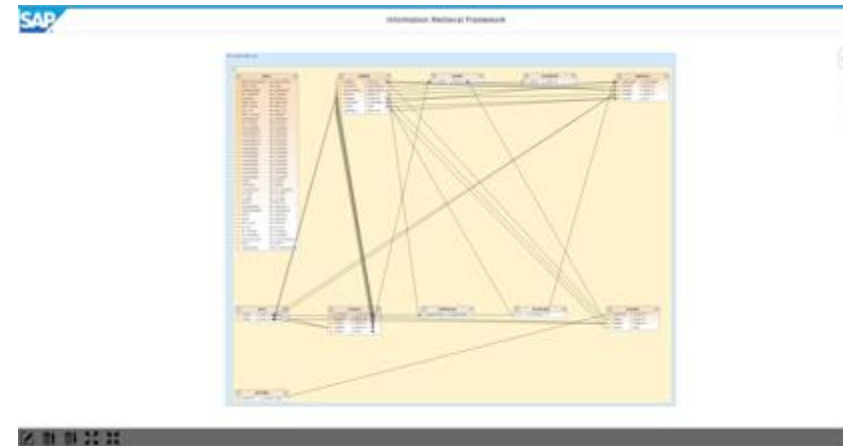
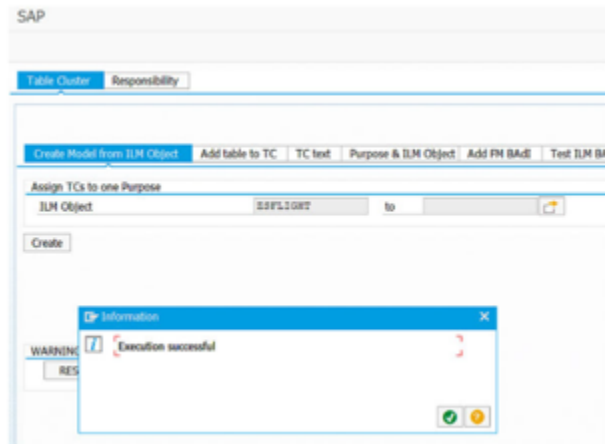
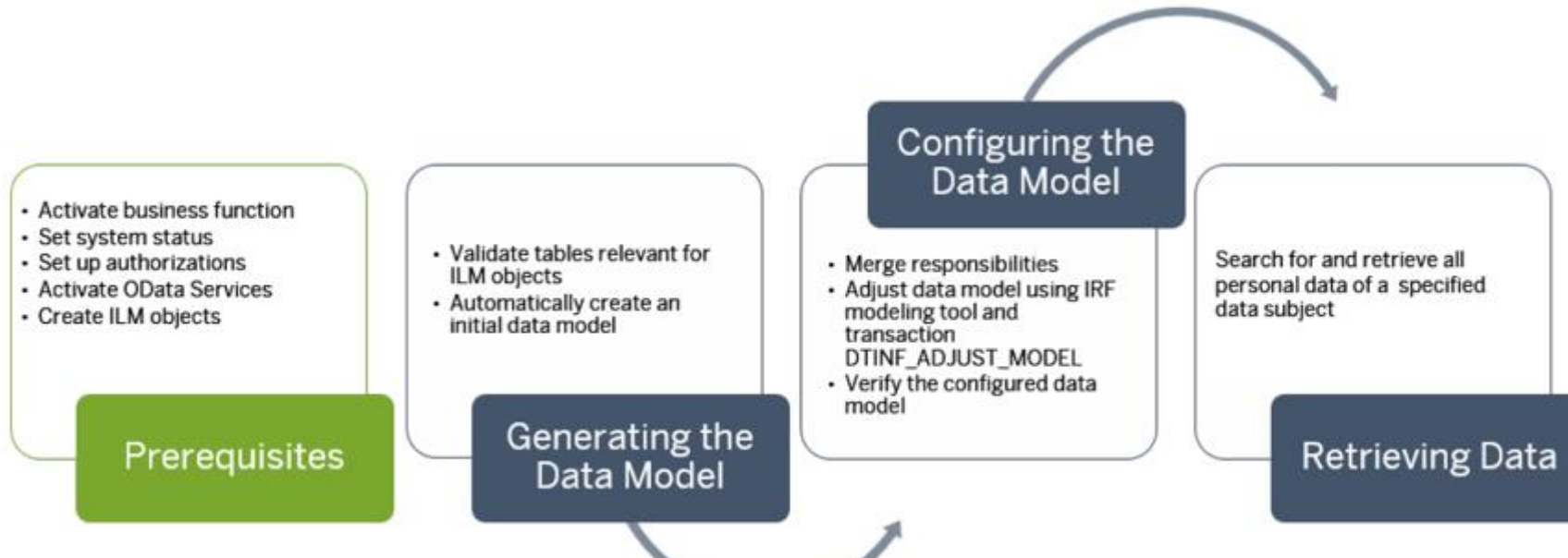
SAP also supports our SAP Business Suite Customers for further articles with Information Retrieval Framework as part of the SAP Business Suite

Information Retrieval Framework

Overview

Link: <https://help.sap.com/doc/04e9cb8f9da44c1ebf35c03799c8fac2/7.51.4/en-US/IRF.pdf>

You can use this business function to search for and retrieve all personal data of a specified data subject.



The Evolution of Information Lifecycle Management

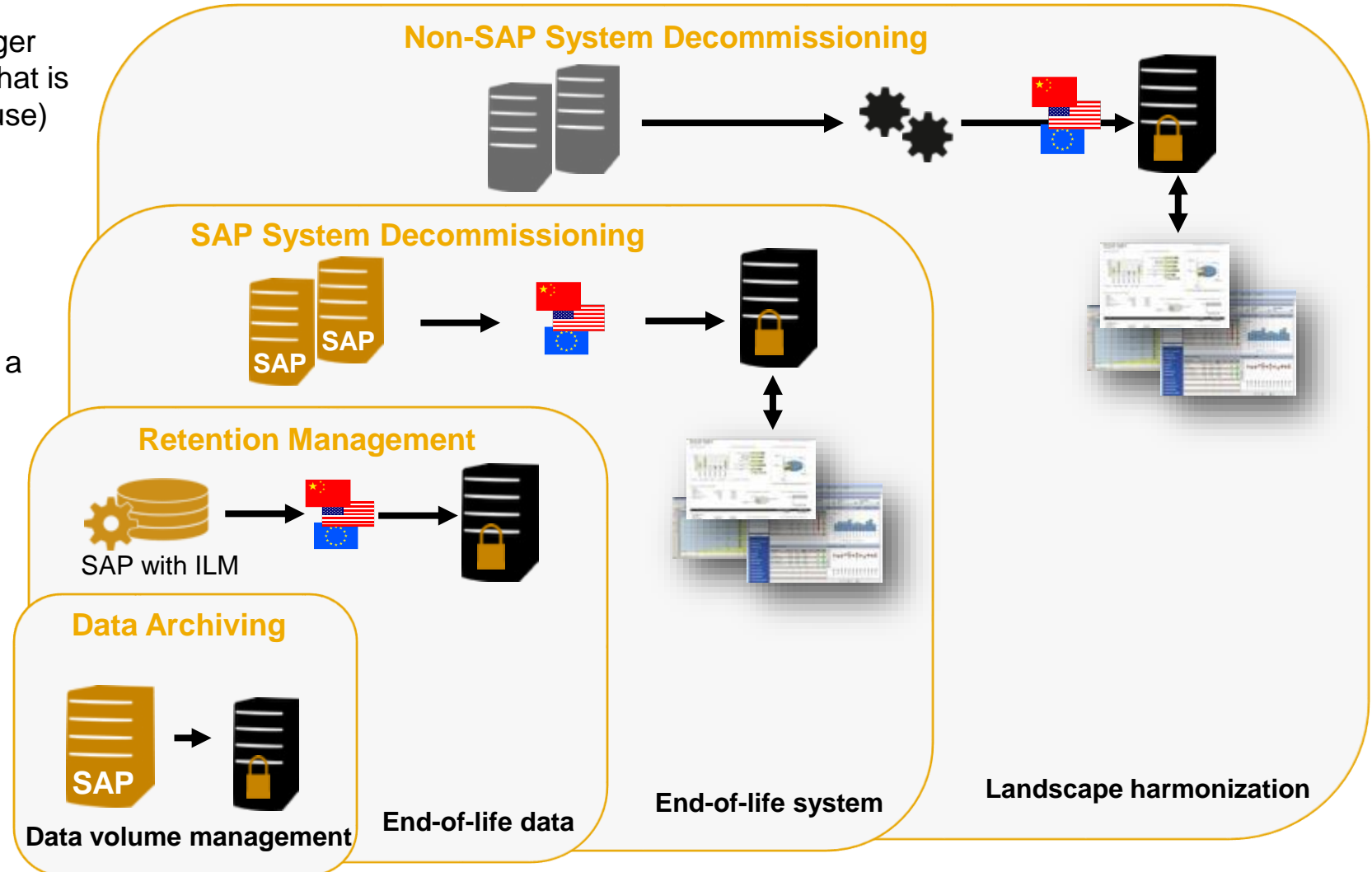
From Data Archiving to SAP ILM

Harmonize and integrate old and no longer actively used data (and only that data that is necessary and compliantly allowed to use) from several non SAP systems into a Retention Warehouse System

Decommissioning old and no longer actively used data (and only that data that is necessary and compliantly allowed to use) from SAP systems into a Retention Warehouse System

Defining Residence and Retention rules for automated blocking and deletion of data in operational live applications

Managing classical Data Archiving activities (moving data from live database to archiving systems) in operational live applications



SAP Data Reduction Package

Rightsizing to be ready for SAP HANA - powered by SAP Information Lifecycle Management

SAP Data Reduction Package powered by SAP Information Lifecycle Management:

Reduced data volumes, optimized HANA license costs, simplified system landscape, consistent reporting, revision-proof storage / archiving

SAP Information Lifecycle Management		
Archiving	Retention Management	Retention Warehouse
<ul style="list-style-type: none"> • Control data growth proactively to meet service-level requests • Analyze data volumes • Move data securely from the database to the archive 	<ul style="list-style-type: none"> • Enforce data retention periods required by regulations and industry practice • Manage the responsible destruction of data based on policies • Store data securely with SAP or partner products • Perform e-discovery operations and set legal holds 	<ul style="list-style-type: none"> • Consolidate data from multiple systems • Decommission legacy systems • Run reports on data from decommissioned systems
Data Volume	End-of-life data	End-of-life system



Management and long-term retention of data and documents as well as significant reduction of data volumes



Control and reduce HANA licensing, system and storage costs



Ensure compliance with regulatory requirements and audit requirements in accordance with existing records management policies
 Standardization and flexibility of reporting mechanisms for all legacy system data, independent of different platforms, systems and releases
 Automation of data destruction in accordance with specifications and guidelines

Beyond the SAP Business Suite – **Discover** and **Document** your **non-SAP Landscape**



What is beyond the “Right to be forgotten” for Personal Data?

SAP supports our SAP Business Suite Customers with the ILM – Retention Management for the “right to be forgotten”

Article 16
Right to erasure (‘right to be forgotten’)
 The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay.

ILM – Retention Management for Personal Data

Article 15
Right of access by the data subject
 The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed.

Information Retrieval Framework

Article 20
Right to data portability
 The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

SAP also supports our SAP Business Suite Customers for further articles with Information Retrieval Framework as part of the SAP Business Suite

ILM Object including Personal data

ILM Object & Business Suite Data Model Information

ILM Residence & Retention Rules

For the definition of ILM Objects, SAP Provides pre-defined objects for specific purposes and use cases (e.g. HCM related). But personal data can be stored in many tables and columns within the Business Suite data model. Either in columns not intended for personal data purpose or in customer own tables like Z-tables.

Information Steward

SAP offers with SAP Information Steward a solution to profile and assess the content of tables to identify potential personal data information.

SAP offers Data Controller Rule Framework

The definition of ILM retention and residence and retention rules can get multi-dimensional taking into account different purposes for different Data controllers.

Data Controller Rule Framework

SOPHIA supports you in identifying data with a personal reference and offers a wide range of processing options

SOPHIA intelligent and complete identification of personal data

- Technical identification of all personal data fields
- Content identification of personal data in all tables Identification of relevant archiving / ILM objects Delta
- Determination of ILM Archiving / ILM Objects
- Determination of the quantity structures
- Automatic integration into table lists (e.g. depersonalization)
- Revision-proof storage of results (versioning)
- Free restriction of the table scope / analysis scope (for example, to customer developments)
- Free threshold value definition for the content-based search for personal data
- Compatible with all systems of SAP Business Suite, Business Warehouse, Human Capital Management and HANA



Find 99% of personal data in your SAP systems

1 Start of analysis

TDA - Analyze of personal data

Table Name to

Project ID

Minimal amount of values

Amount batch jobs

Search in Table Field analyze results

Number of hits

Runtime Maximum no. of hits

Project ID	Table	Field Name	Data element	Domain	Lngh	DTyp	Dis.Vals	Corr. tab	Corr.field	Corr.amoun	Example	Status
N01.220	BUT000	MC_NAME1	BU_MCNAME1	CHAR35	35	CHAR	10	BUT000	MC_NAME1	102	BILANZKOORDINATOR STROM MÜLLER NATUVION NETZ GMBH MUSTERMANN NATUVION LIEFERANT GMB...	INCLUDE
N01.220	BUT000	MC_NAME2	BU_MCNAME2	CHAR35	35	CHAR	10	BUT000	NAME_FIRST	11	PETER MAX JOACHIM FERDINAND OLIVIA LINDA VERONIKA MICHAEL TONI KARL	INCLUDE
N01.220	BUT000	NAME_FIRST	BU_NAMEP_F	BU_NAME	40	CHAR	10	BUT000	NAME_FIRST	102	Peter Max Joachim Ferdinand Olivia Linda Veronika Michael Toni Karl	INCLUDE
N01.220	BUT000	NAME_ORG1	BU_NAMEOR1	BU_NAME	40	CHAR	10	BUT000	NAME_FIRST	11	Bilanzkoordinator Strom Natuvion Netz GmbH Natuvion Lieferant GmbH GAS - Gemeinde 0004 - über 500.000 G...	INCLUDE

2

Use of results

Between 4 and 24 hours runtime

Find 99% of personal data in your SAP systems

Exemplary result of a search for personal data with SOPHIA

Search in Table: /NA2/TDA_FLD_RES Field analyze results

Number of hits: 4

Runtime: 0 Maximum no. of hits: 500

Project ID	Table	Field Name	Data element	Domain	Lngh	DTyp	Dis.Vals	Corr. tab	Corr. field	Corr. amoun	Example	Status
N01.220	BUT000	MC_NAME1	BU_MCNAME1	CHAR35	35	CHAR	10	BUT000	MC_NAME1	102	BILANZKOORDINATOR STROM MÜLLER NATUVION NETZ GMBH MUSTERMANN NATUVION LIEFERANT GMB...	INCLUDE

Name	Typ	Beschreibung	ILM-Objekt Zuordnung	ILM-Objekt Beschreibung
BU_PERN0	Personennummer		CA_BUPA	Archivierung von Geschäftspartnern
BU_PARTNER	Geschäftspartnernummer		CA_BUPA	Archivierung von Geschäftspartnern
AD_ADDORNUM	Adressnummer		CA_BUPA	Archivierung von Geschäftspartnern
AD_ADDORNUM	Adressnummer		FI_ACCRECV	Debitorenstammdaten
AD_ADDORNUM	Adressnummer		FI_ACCPAYB	Kreditorenstammdaten
BU_RELNR	Geschäftspartner-Beziehungsnummer		CA_BUPA	Archivierung von Geschäftspartnern
VERTRAG	Vertrag			
E_PROPERTY	Eigentum			
VKONT_KK	Vertragskontonummer			
E_BELNR	Belegnummer eines Abrechnungsbelegs			

Table fields with personal data

Quantity structure of the data as an indication of relevance

Example contents of the table fields found for convenient analysis

ILM objects in which the tables found are used

SOPHIA supports you in identifying data with a personal reference and offers a wide range of processing options

Find 99% of personal data in your SAP systems

Overview of Functionalities

- Covers all SAP system landscapes
- Covers all data / fields with personal reference (customer tables, table field enhancements,...)
- Combination of DDIC-based structure search and semantic/content-based search
- Data scan: finds all table fields that contain "conspicuous" data (direct and indirect personal reference)
- Content scan: finds table fields with direct personal reference, based on the content
- High performance parallelization

Why do you need Sophia?

- Sophia drastically reduces the effort involved in introducing a depersonalization strategy
- Sophia provides the basis for the introduction of a data life cycle strategy
- Sophia helps you to identify the scope of the information
- Sophia helps to prioritize the topics of her GDPR / Data Privacy Strategy
- Sophia delivers substantiated results within the framework of compliance audits and controls

Sophia drastically reduces manual effort in data protection projects by analyzing and automatically identifying all personal data in a system / system landscape

SAP Information Steward

WHERE in my system landscape can be personally identifiable information?

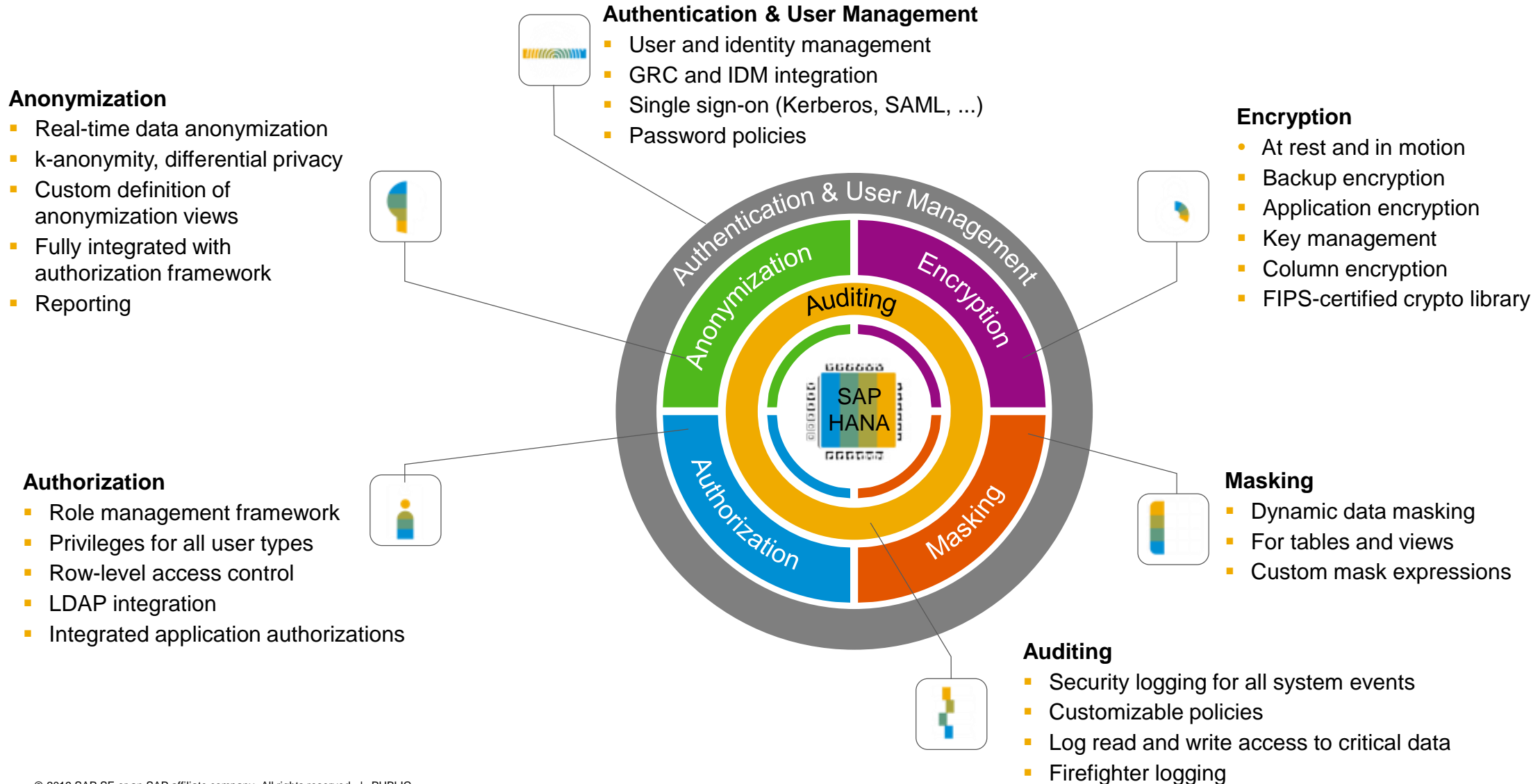
The screenshot shows the SAP Information Steward interface. On the left, a tree view displays system objects, with 'dbo.Customers' selected. A context menu is open over the 'Content Type' column, with 'Content Type' highlighted. A yellow arrow points from this menu to a detailed view of the 'dbo.Customers' table. This view shows a list of fields (FIELD1 to FIELD13) and their corresponding content types. The content types listed are: Given Name1, Country, Phone, Email, Date, Family Name1, Title, Address, Locality, Region, and Postcode. These content types are enclosed in a red box.

Tables	Advisor	Content Type
Search		
DATABASE		
TABLE		
FIELD1		Given Name1
FIELD10		Country
FIELD11		Phone
FIELD12		Email
FIELD13		Date
FIELD2		Family Name1
FIELD3		Title
FIELD4		Address
FIELD5		
FIELD6		
FIELD7		Locality
FIELD8		Region
FIELD9		Postcode

Content Type profiling on "unknown data sources" to find columns of personally identifiable information

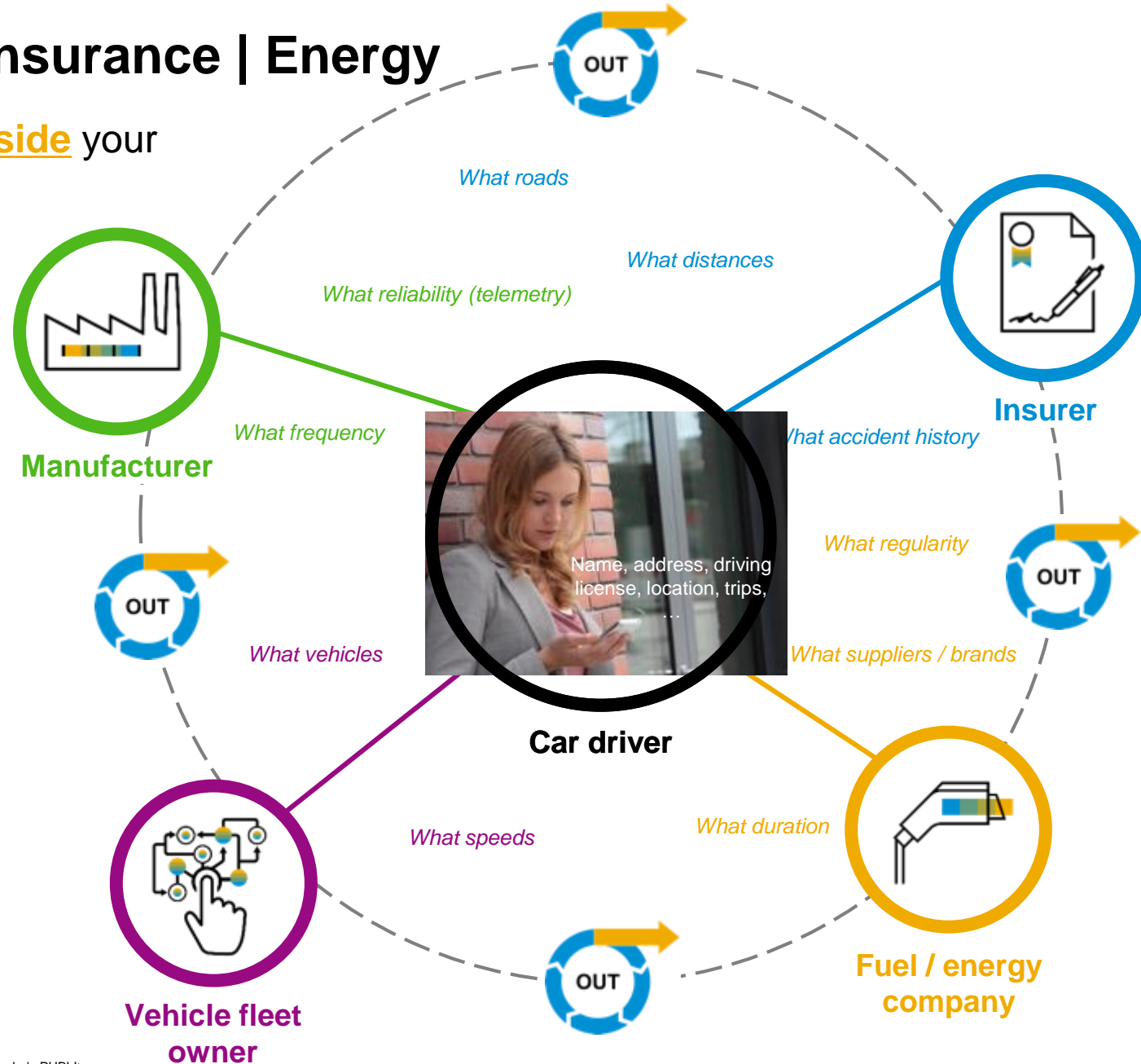
Use of a reference dataset with business partner details

SAP HANA's holistic framework for secure information access



Automotive | Insurance | Energy

Monetising data **outside** your business



- Vehicle fleet owners and manufacturers provide “Mobility-as-a-Service”
- Insurance pay-per-drive in real-time
- Energy is predictively optimised across fleets of vehicles in real-time
- Driver-time is optimised
- Ride-sharing
- Vehicle use is maximised
- ???

Data Management: How SAP solutions can help

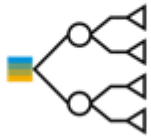
Discovery & Categorization



SAP Information Steward – Dynamic data discovery, tagging, classification

SAP Enterprise Architecture Designer – Documentation of Data Architecture including Personal Data lineage

Mapping & Flow



SAP Process Mining by Celonis – Use or personal data in business processes relating to lawful purpose

SAP Master Data Governance – Correct and complete master data with assigned user governance

SAP Data Services – Standardise formats, consolidate & cleanse personal data, quality & accuracy

Limitation & Lifecycle



SAP Information Lifecycle Management – End of purpose blocking & deletion according to retention rules; Data from legacy systems consolidated to central “retention warehouse”

SAP Extended Enterprise Content Management by OpenText – Manage unstructured content sales orders, invoices & HR documents

QUANTIFY SCOPE:

What personal data and where it is stored across your enterprise

TRANSPARENCY & ASSURANCE:

Why your business uses personal data and for what purpose

TCO & RISK REDUCTION:

Automated management of personal data lifecycle

What can SAP help you accomplish?

End-to-End Solutions for GDPR Data Protection & Privacy



Simplify the journey

- Seamless implementation with easily adaptable Cloud services
- Availability of best practices to save time and effort
- Easy navigation through workspaces
- Flexible set of options from SAP and our extensive partner ecosystem



Strengthen the foundation

- Market-leading governance and data management capabilities
- Comprehensive assessments and surveys
- Consistent documentation and auditability to support attestation



Build Customer Trust

- Well-defined policies, processes, and controls
- Clear ownership and accountability
- Automated notification and workflow for issue resolution

Q&A, Discussion and **next steps**



The background of the poster is a vibrant orange with a pattern of black lines radiating from the center, creating a sunburst effect. In the center, there is a large, arched glass structure, possibly a modern building entrance or a transit hub, with a person walking through it. To the right, another person is captured in motion, blurred, suggesting a fast-paced environment.

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Thank You!

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Center of Excellence

Database & Data Management

SAP SE

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