

# SAP Business Network Privacy Statement

**PREVIEW, NOT YET PUBLISHED**

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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 in connection with the SAP Business Network. SAP SE and Ariba Inc. (together "SAP") will each use Personal Data as defined below that you provide hereunder. If you want to use an individual services such as SAP Business Network or Business Network for Logistics (collectively "SBN" or "SBN Service(s)"), the respective SAP affiliate providing this network will then use your Personal Data for the purposes set out herein. SAP's data protection officer can be reached at [privacy@sap.com](mailto:privacy@sap.com).

This Privacy Statement consists of several chapters. The first chapter outlines how registration data is used by SBN Services and the various features and services available. The following chapters outline individual SBN Services' usage of Personal Data.

## A. Account data for all SBN Services

### Who is the data controller?

The data controller for the categories of personal data collected and used for the purposes collected hereunder depends on which SBN Service you are using:

- SAP Business Network: (SAP Business Network Fulfillment for Suppliers, SAP Business Network for Supply Chain, SAP Ariba Sourcing, SAP Ariba Contracts and SAP Business Network Discovery: Ariba Inc., 3420 Hillview Ave, Palo Alto, CA 94304, United States of America ("Ariba Inc.")).
- SAP Business Network for Logistics: SAP SE, Dietmar-Hopp-Allee 16, 69190 Walldorf, Germany ("SAP SE").

### What personal data does SAP collect?

If you register for SBN, SAP may collect the information you provide to SAP, which consists of your name, phone, email and company postal address, language, user IP address, browser locale, company profile and registration data, business title, assignment type, and to the extent you are a sole proprietor company name, company address, DUNS-number, tax ID number, company bank data, and personalized links to social media (like Facebook, Twitter, LinkedIn), User Role, ANID and user IP address (your "Personal Data").

### Why SAP needs your Personal Data and on what legal basis is SAP using it?

SAP requires your Personal Data in order to

- provide you with access to SBN Services. Personal Data may be made available to other SBN users depending on the role assigned to business information such as contact details in your SBN account (for more information on the visibility levels see applicable section of the [SAP Help Portal](#)).
  - To the extent that you are a sole proprietor, your business name and address may be accessible to other SBN users.

- A user of SBN Services acting as user administrator for its employer may have his/her username visible to other SBN users.
- Your organization may provide additional contacts such as “Company Wide Contacts”. Depending on the SBN Service and the visibility choices selected by you or your company, your username(s), phone number(s), and email addresses and other profile information may be visible to other users of SBN.

Any processing of your Personal Data in connection with this purpose is based on the consent of the data subject (Article 6(1) lit. a GDPR or other applicable laws).

- deliver SBN Services based on a contractual relationship (Article 6(1) lit.b GDPR or other applicable laws) or SAP ´s legitimate interest (Article 6(1) lit.f GDPR or other applicable laws). This includes the operation of SBN Services, usage enhancements, outreach for billing purposes, and delivery of technical notices. This processing based on a contractual relationship includes that SAP uses certain technically required cookies. SAP gathers certain information automatically and stores it in log files. This information may include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. If you configure your browser to reject cookies, you will not be able to access SBN Services. Personal Data you submit while using SBN Services is not stored in cookies except where necessary to perform web site security and service functionality. SAP does not place any third-party advertising tracking cookies on your computer during your use of SBN Services. The web pages you access when using SBN Services do not respond to "do not track" signals sent by your browser.
- facilitate SAP Business Network Discovery, which is a public exchange of opportunities and capabilities. Any processing of your Personal Data in connection with this purpose is based on a contractual relationship (Article 6(1) lit.b GDPR or other applicable laws).
- keep you up to date. Within an existing business relationship between you or your employer and SAP, SAP may inform you, where permitted in accordance with local laws, about its products or services which are similar or relate to SBN Services. This may include analysis of your and your employer’s usage of SBN Services (registration information as set out above, profile, transactions and documents processed by SBN Services) to personalize communications with you on SAP’s latest offerings. This purpose is based on SAP ´s legitimate interest to maintain business relationships with you, ensure your satisfaction as a user or customer, and provide you with information about other SAP products and services as indicated by your interest or demand (legitimate interest to operate sustainable business relationship with SAP customers and partners) (Article 6(1) lit.f GDPR or other applicable laws).
- request feedback, questionnaires and surveys. Where you have attended a webinar, seminar or event of SAP or purchased or used products or services from SAP, SAP might contact you for feedback regarding the improvement of the relevant webinar, seminar, event, product or service. This purpose is based on SAP ´s legitimate interest to stay in touch with its contacts and receive meaningful feedback on its products and services (Article 6(1) lit.f GDPR or other applicable laws).
- SAP may anonymize Personal Data you provide hereunder, or which SAP collects during the use of SBN Services and use this anonymized data to create statistical reports,

benchmarks and insights which SAP uses to improve SBN Services and/or which SAP may make available to customers of SBN Services. For the avoidance of doubt, anonymizing in this case does not only mean changing information that it cannot be used any longer to identify individuals but also that no sensitive non-personal data such as e.g. contract values or business partners are revealed to other customers of SBN Services. Any processing of your Personal Data in connection with this purpose is based on SAP's legitimate interest (Art. 6(1) lit. f GDPR or other applicable laws) to provide intelligent services to its customers.

- comply with applicable export laws. SAP and its products, technologies, and services are subject to the export laws, trade sanctions, and embargoes ("Export Laws") of various countries including, without limitation, those of the European Union ("EU"), Germany and of the United States of America. Therefore, you acknowledge that, pursuant to the applicable Export Laws issued by these countries, SAP is required to
  - take measures to prevent persons, entities and organizations listed on government-issued sanctioned party lists from accessing certain products, technologies, and services through SAP's websites or other delivery channels controlled by SAP. This may include (i) automated checks of any user registration data as set out herein and other information a user provides about his or her identity against applicable sanctioned-party lists; (ii) regular repetition of such checks whenever a sanctioned-party list is updated or when a user updates his or her information; (iii) blocking of access to SAP's services and systems in case of a potential match; and (iv) contacting a user to confirm his or her identity in case of a potential match; and
  - ensure that no individuals from embargoed countries access its services. Therefore, when an existing user logs into SBN and utilizes SBN Services from an embargoed country, the user's registration data and IP address may be used by SAP to block the user's access and to log access attempts from embargoed countries.

Any such usage of registration data and IP addresses by SAP is necessary for SAP's compliance with applicable EU Export Laws (Article 6 para. 1 (c) GDPR or other applicable laws) and SAP's legitimate interest to comply with non-EU Export Laws (Article 6 para. 1 (f) GDPR or other applicable laws).

Although providing Personal Data is voluntary, without your Personal Data SAP cannot provide you with access to SBN Services.

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

SAP collects most of your Personal Data directly from you while you sign up with and use SBN Services. 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:

- a user of SBN Services may provide names of shareholders and names and business titles of executives of his/her employer.
- a user of SBN Services creating a contact by adding name, email address, address, business title, and assignment type for further exposure in SBN Services.

Your organization may provide additional contacts (e.g. "Company Wide Contacts" in SBN). Depending on the individual SBN Service and the visibility choices selected by you or your

company, your contact name, phone numbers, and email addresses and other profile information shall be visible to other users of SBN, as in the use of the SAP Business Network Discovery. Please review the SBN documentation for visibility options, notification options, and role-based options that affect how a specific user or company contact's business contact information may be used or visible within SBN.

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

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

- for you to participate in (or, in accordance with the prior paragraph, to sign up with) SBN Services or until you revoke your consents granted in connection with this Privacy Statement.
- for SAP to comply with its statutory obligations resulting from applicable export laws.
- until you object against the use as described in these Privacy Statement by SAP if SAP's use of your Personal Data is based on SAP's legitimate business interest.

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:

- individual SBN Services you signed up to use.
- affiliates of the SAP Group.
- third party service providers who are performing services on your behalf, if required.
- other SBN Services, hosted by SAP, third parties.

Please note that Personal Data may be made available to other SBN users as set forth hereinabove.

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) 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,

you will not be able to continue to participate in SBN Services in case you have limited your request for deletion to some of them.

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 that you have provided to SAP. In this case, please contact the email address below and specify the information or processing activities to which your request relates, the format in which you would like to receive this information, and whether the Personal Data should be sent to you or another recipient. SAP will carefully consider your request and discuss with you how it can best fulfill it.

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, or (iv) 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.

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, you will not be able to continue to use any SBN Service that requires SAP's use of your Personal Data.

You may at any time withdraw a consent granted hereunder. In case of withdrawal, SAP will not process your Personal Data based on 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 your Personal Data by SAP up to the point in time of your withdrawal. Furthermore, kindly note that SAP will not be any longer able to display your Personal Data in SBN's data base.

You can at any time object to SAP's use of your Personal Data based on legitimate interest as set forth hereinabove by sending an email to the email address stated at the bottom of this section. In this case, 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 override your interest in objecting, or if SAP requires the information for the establishment, exercise or defense of legal claims.

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

Please direct any requests to exercise your rights to [dsr.business.network@sap.com](mailto:dsr.business.network@sap.com).

### **How will SAP verify requests to exercise data protection rights?**

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, fraudulent, or are not otherwise required by local law.

### **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.

Children. In general, SBN 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 or the equivalent minimum age in the relevant jurisdiction, you cannot register with and use SBN Services.

## **B. Certain SBN Services provided by connected networks specific privacy statements.**

### **SAP Business Network for Logistics**

In addition to the information listed in Chapter A above, SAP is also collecting your vehicle's license plate, business partner id and SCAC code.

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

SAP collects your Personal Data directly from you while you sign up for using SBN Services. The only exception is that if you are a logistics service provider, a shipper that orders logistics services from you may provide SAP with your Personal Data and ask SAP to invite you to sign up with SAP Business Network for Logistics. In this case SAP will use your email address only for sending you this invite and any other Personal Data of you provided by the shipper only to prepopulate your registration form for signing up to SAP Business Network for Logistics. If you do not respond to such an invite or if you reject it, SAP will delete any Personal Data received from the shipper (in case you do not respond within 14 days from sending you the invite, or if you reject without undue delay).

## **C. 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 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, 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 on the international dimension of data protection [here](#).

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

Where SAP is subject to the requirements of the Privacy Act 1988 (Cth) ('Privacy Act'), the following applies:

SAP may store your Personal Data in paper-based files or as an electronic record in the Cloud or on physical devices e.g. computer systems. Your Personal Data will likely be held and stored by the SAP Group located in another country for our general business purposes including outsourcing and data processing. We will only do this where it is necessary or appropriate to achieve the purposes set out in this Privacy Statement. We take reasonable steps to protect your personal information from misuse, interference and loss and from unauthorized access, modification or disclosure.

You can contact Us either by the telephone number +61 2 9935 4939 or via email at [dsr.business.network@sap.com](mailto:dsr.business.network@sap.com) to exercise the following rights:

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.

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.

In Australia, a complaint should first be made to SAP in writing as required by law. You can find more information about privacy and the protection of Personal Data on the Office of the Australian Information Commissioner website.

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

Where SAP is subject to the requirements of the Columbian 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 [please add contact email address]. 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 Brazilian General Data Protection Law (“LGPD”)**

SAP has appointed a Data Protection Officer for Brazil. Written inquiries, requests or complaints to our Data Protection Officer may be addressed to: Paulo Nittolo Costa Email: webmaster[@]sap.com Address: Avenida das Nações Unidas 14171 - Marble Tower – 7th Floor - São Paulo-SP, Brazil 04794-000

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

Where SAP is subject to the Philippine Data Privacy Act and its Implementing Rules and Regulations, the following applies:

- When you request to update or correct your Personal Data, SAP may deny the request if it is manifestly unfounded, vexatious, or otherwise unreasonable.
- When requesting the data portability of the Personal Data you provided to SAP, you must additionally specify the commonly used electronic or structured format in which you would like to receive the Personal Data.
- When you request to object against the processing of your Personal Data: (i) You may do so if SAP is processing based on its Legitimate Interest. SAP will carefully review your objection and cease further use of the relevant information, unless SAP has other lawful basis for processing in Sections 12 and 13 of the Data Privacy Act. (ii) You can also object to the processing of your Personal Data for direct marketing, profiling, or in cases of automated processing where your Personal Data will, or is likely to, be made as the sole basis for any decision that significantly affects or will affect you.
- You can reach out via email at [dsr.business.network@sap.com](mailto:dsr.business.network@sap.com) to exercise your data protection rights.
- Compensation can only be claimed when National Privacy Commission or the courts determined that you sustained damages due to inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of Personal Data, considering any violation of your rights and freedoms. You may likewise seek redress from the National Privacy Commission, but it must be clearly shown that you are the subject of a privacy violation, Personal Data breach, or are otherwise personally affected by a violation of the Data Privacy Act.

The contact details of your local Data Protection Officer/s are as follows:

Data Protection Officer, SAP Philippines Inc., 27th Floor NAC Tower, 32nd Street Bonifacio Global City, Taguig City, 1632; email: [dpo\\_sap.ph@sap.com](mailto:dpo_sap.ph@sap.com); telephone number:: +632-8705-2500



## **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 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 have the right to:

- 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. If you 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. You can contact Us via phone 011 325 6000, via post 1 Woodmead Drive, Woodmead, Johannesburg, South Africa 2148 or via email [privacy\[@\]sap.com](mailto:privacy[@]sap.com).
- If you are not satisfied with the process above, you have the right to lodge a complaint with the Information Regulator via post JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001, P.O. Box 31533, Braamfontein, Johannesburg, 2017 or via email: [complaints.IR\[@\]justice.gov.za](mailto:complaints.IR[@]justice.gov.za) or for enquires: [inforeg\[@\]justice.gov.za](mailto:inforeg[@]justice.gov.za).

## **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 hereon 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.

To exercise these rights, or to limit the Sharing of your Personal Information, please contact us at [dsr.business.network@sap.com](mailto:dsr.business.network@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 this Panel is 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.

### **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:

You can request from SAP personal data about you that is in the possession or under the control of SAP and information about the ways in which such personal data has been or may have been used or disclosed by SAP within a year prior to this request. Please be informed that SAP is not obliged to accede to your request if any exceptions under the PDPA apply.

You may submit a request to have inaccurate/incomplete personal data corrected in our systems. Please be informed that SAP is not obliged to accede to your request if any exceptions under the PDPA apply.

**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.

Lodge a complaint to the Personal Data Protection Commission (PDPC) if you are not satisfied with how SAP is processing your Personal Data.

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; Address: Mapletree Business City, 30 Pasir Panjang Rd, Singapore 117440 Contact: +65 6664 6868

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

Where SAP is subject to the requirements of the South Korea Personal Information Protection Act (“PIPA”), the following applies:

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.

How can you exercise your data protection rights?

SAP has appointed a local Chief Privacy Officer for South Korea.

Please direct any enquiries or requests via email at [dsr.business.network@sap.com](mailto:dsr.business.network@sap.com) or via phone at +82-2-2194-2279.

### **Where SAP is subject to privacy requirements in Malaysia.**

Where SAP is subject to the requirements of the Personal Data Protection Act (“PDPA”) of Malaysia, the following applies:

Written inquiries, requests or complaints can be sent to the Data Protection and Privacy Coordinator for Malaysia via email [dsr.business.network@sap.com](mailto:dsr.business.network@sap.com) or can be reached via phone +60 3-2202 6000. SAP has implemented technology, security features and strict policy guidelines to safeguard the privacy of users’ Personal Data.

### **Where SAP is subject to privacy requirements in New Zealand**

Where SAP is subject to the requirements of the Privacy Act 2020 (‘Privacy Act’), the following applies:

1. The supply of this Personal Data by you is voluntary.
2. If the Personal Data is not collected, we may not be able to provide with you with SBN Services.

You have the right to:

- 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.
- 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 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 of Mexico.**

Where SAP is subject to the requirements of the Mexican Federal Law for the Protection of Personal Data Held by Private Parties of 2010, the following applies:

You have the right to file a complaint with the National Institute of Transparency Access to Information and Protection of Personal Data (INAI) to assert any disagreement related to the processing of your Personal Data by SAP.

SAP reserves the right to change, modify, add or remove portions of this Privacy Statement at its sole discretion. In such case, SAP shall maintain available a complete version of SAP's Privacy Statement. SAP will notify you of any change or modification to this Privacy Statement via the respective communication channel SAP has with you.

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

Where SAP is subject to the requirements of the Digital Personal Data Protection Act, 2023 ('DPDPA') the following applies:

As part of a global group of companies operating internationally, SAP has affiliates (the SAP Group) and third party service providers outside of the Indian region and will transfer your Personal Data to countries outside the India region, subject to any restrictions as may be notified by the Central Government in this regard.

You have the right to:

- request from SAP at any time access to information about which Personal Data SAP processes about you and, if necessary, the correction, completion, update 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.
- 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.
- request from SAP the right to have readily available means of grievance redressal provided by SAP in respect of any act or omission of SAP regarding the performance of SAP's obligations in relation to your Personal Data or your exercise of rights in relation thereto.
- nominate, any other individual, who shall, in the event of your death or incapacity, exercise your data protection rights.

Please direct any requests/queries to exercise your rights to [dsr.business.network@sap.com](mailto:dsr.business.network@sap.com). In India, after exhausting the opportunity of redressing the right of grievance, you may lodge a complaint to the Data Protection Board of India.