



SAP Universal ID Privacy Statement

1. When does this Privacy Statement apply?

SAP SE (“SAP”) provides a central user authentication service (the “Universal ID Service”) which allows users to access various websites, apps and cloud services across the SAP Group with one user ID (the “Universal ID”). This privacy statement applies to the creation and usage of Universal IDs and is in addition to any website, app or cloud service specific privacy statement.

2. Who is the data controller?

Data controller in case of the Universal ID Service is SAP SE, Dietmar-Hopp-Allee 16, 69190 Walldorf, Germany (“SAP”), SAP’s data protection officer can be reached at (privacy@sap.com).

3. Which data categories are used by SAP and what are purposes and duration of data usage?

a. Creation and usage of Universal IDs. If you register for a website, app or cloud service of an entity of the SAP Group for the first time that is using Universal ID Service for authentication, we collect your first name, last name, email address and country in order to create a Universal ID which is unique to you (together your “Personal Data”). Once this registration process is completed, you can use your Universal ID to get access to the relevant website, app or cloud service. Furthermore, you can add further email addresses to your Universal ID at any time. Please only use and add email addresses that are only used by you and which are unique to you to your Universal ID.

You can use your Universal ID also to obtain access to other websites, apps and cloud services of the same or other entities of the SAP Group by simply entering one of your email addresses associated with your Universal ID into the relevant websites, apps and cloud services. Furthermore, the Universal ID Service offers you the ability to keep your Personal Data up to date yourself by using the Universal ID Service’s Account Manager feature. We therefore require your Personal Data in order to create and make accessible your Universal ID to you (performance of a contractual relationship, Article 6 para. 1 (b) EU General Data Protection Regulation (“GDPR”).

b. Compliance with 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

aa. 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

bb. ensure that no individuals from embargoed countries access its services. Therefore, when an existing user logs into a website, app or cloud service of an entity of the SAP Group 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) and SAP's legitimate interest to comply with non-EU Export Laws (Article 6 para. 1 (f) GDPR).

Kindly note that, although any provisioning of Personal Data is voluntarily to you, without your Personal Data, SAP cannot provide you with access to the Universal ID Service. SAP will only store your Personal Data for as long as it is required for providing you with access to the Universal ID Service, as long as you use the Universal ID Service and for the purposes of SAP's compliance with applicable Export Laws plus in each case, where applicable, any additional periods under applicable laws during which SAP has to retain your Personal Data.

4. Who receives my Personal Data?

As part of a global group of companies, SAP has affiliates and third-party service providers within as well as outside of the European Economic Area (the "EEA"). As a consequence, whenever SAP is using or otherwise processing your Personal Data for the purposes set out in this Privacy Statement, SAP may transfer your Personal Data to countries outside of the EEA including to such countries in which a statutory level of data protection applies that is not comparable to the level of data protection within the EEA. Whenever such transfer occurs, it is based on the Standard Contractual Clauses (according to EU Commission Decision 87/2010/EC or any future replacement) in order to contractually provide that your Personal Data is subject to a level of data protection that applies within the EEA. You may obtain a redacted copy (from which commercial information and information that is not relevant has been removed) of such Standard Contractual Clauses by sending a request to privacy@sap.com.

5. What are my rights as a data subject?

You can at any time access, correct and delete your Personal Data used by SAP for the purposes of using your Universal ID as an authentication mean in the Universal ID Service's Account Manager feature. Furthermore, you can also request from SAP at any time 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 use the Universal ID Service which means that you will be not able any more to access any services which use the Universal ID Service for user authentication. You may furthermore object against SAP's usage of your registration data and IP address for the purposes of compliance with applicable non-EU Export Laws at any time. Kindly note, however, that in this case SAP, due to its continuing obligation to comply with these non-EU Export Laws, always has a compelling ground to further use your personal data for this purpose which overrides your right to object. Therefore, if you do not agree to such usage of your registration data and IP address by SAP, please do not use the Universal ID Service or any website, app or cloud service that uses the Universal ID Service for user authentication.

You may further request from SAP a copy of the Personal Data that you have provided to SAP and that SAP uses for the purposes of making the Universal ID Service available to you. 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 this information, and whether the Personal Data is to 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, (but only for as long as 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 claim that you require SAP to retain such data in order to claim or exercise legal rights or to defend against third party claims.

Please direct any such request through the [CIC Contact Us](#) page.

If you take the view that SAP is not processing your Personal Data in accordance with the requirements set out herein or applicable EEA 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 State of Baden-Württemberg.

