

SAP's New Privacy Solution

Dr. Sandro Lovisa

CPO SAP Privacy Governance

SAP SE



Key Outcomes/Objectives

1. Learn about SAP's new privacy products
2. Learn about how they can support CCPA and GDPR requirements

Agenda

- General Overview
- SAP Privacy Governance Details
- Data Subject Access Rights Demo

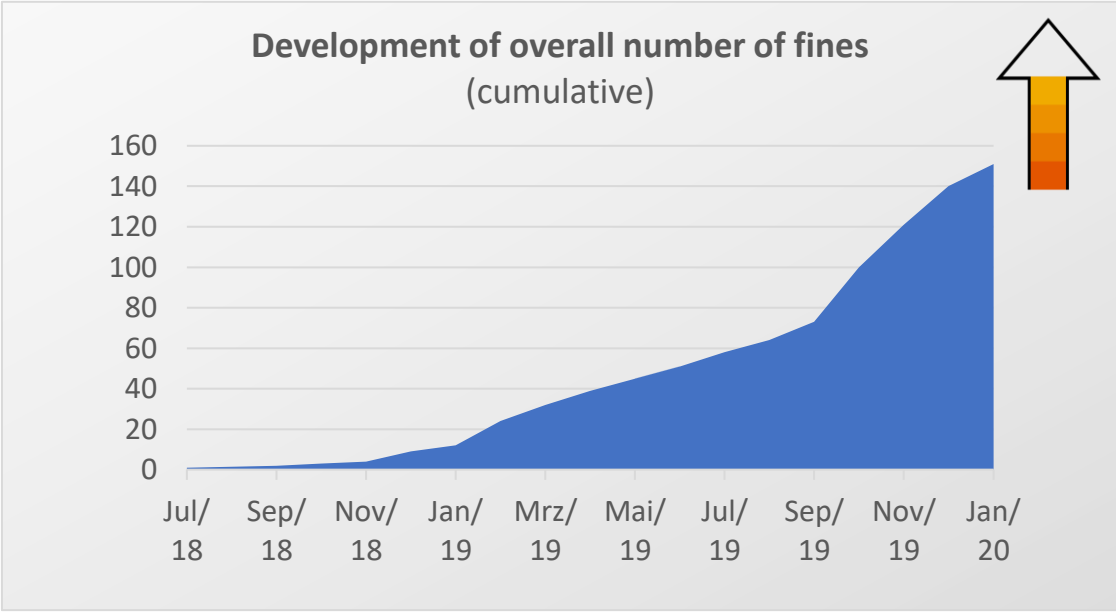
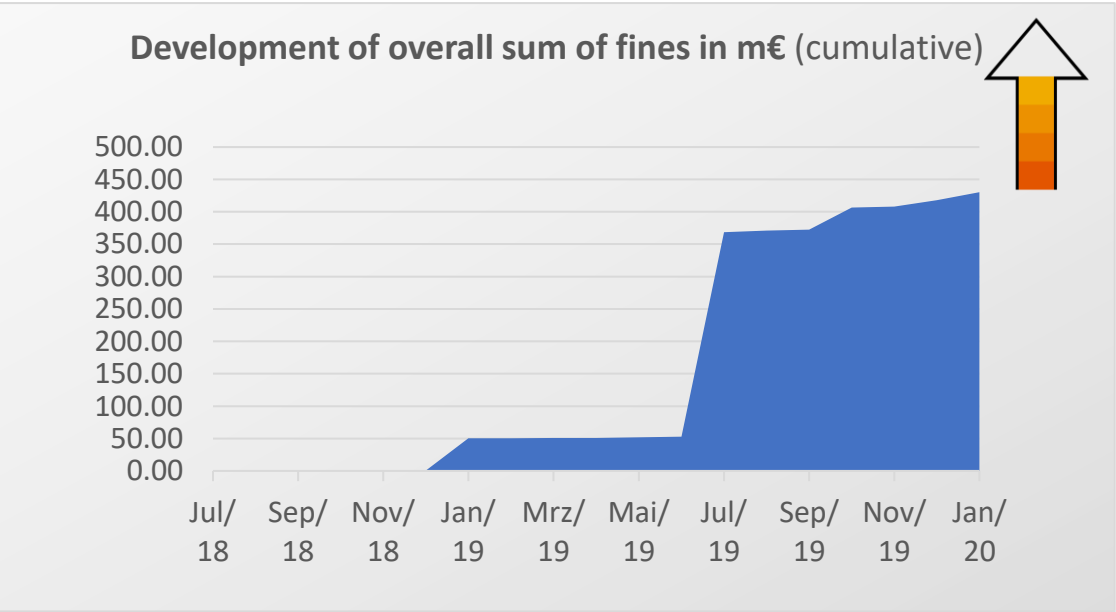
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Overall development of GDPR related fines



Countries with highest fines



United Kingdom



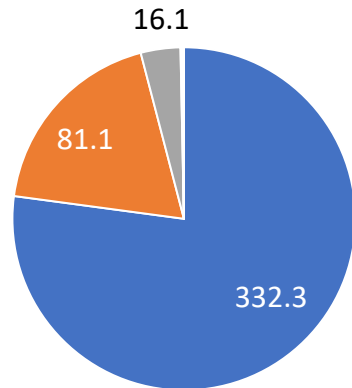
France



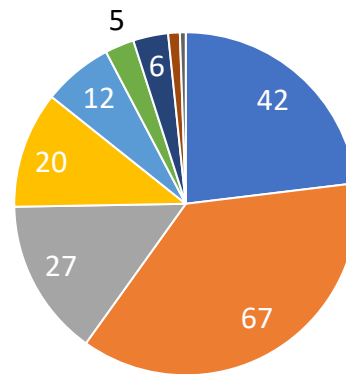
Germany

Fines by GDPR violation types

Fines by type of violation in m€



Number of fines



- Insufficient technical and organizational measures to ensure information security
- Insufficient legal basis for data processing
- Non-compliance with general data processing principles
- Insufficient fulfilment of data subjects rights
- Insufficient fulfilment of information obligations
- Insufficient fulfilment of data breach notification obligations
- Insufficient cooperation with supervisory authority
- Insufficient data processing agreement



Looking at particular cases:

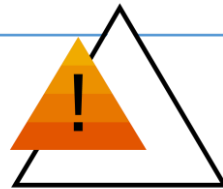
British Airways

Jul 2019

€204.600.000,00 fine

“Insufficient technical and organizational measures to ensure information security”

Art. 32 GDPR



Deutsche Wohnen SE

Oct 2019

€14.500.000,00 fine

“Non-compliance with general data processing principles”

Art. 5 GDPR, Art. 25 GDPR



Austrian Post

Oct 2019

€18.000.000,00 fine

“Insufficient legal basis for data processing”

Art. 5 (1) a) GDPR, Art. 6 GDPR

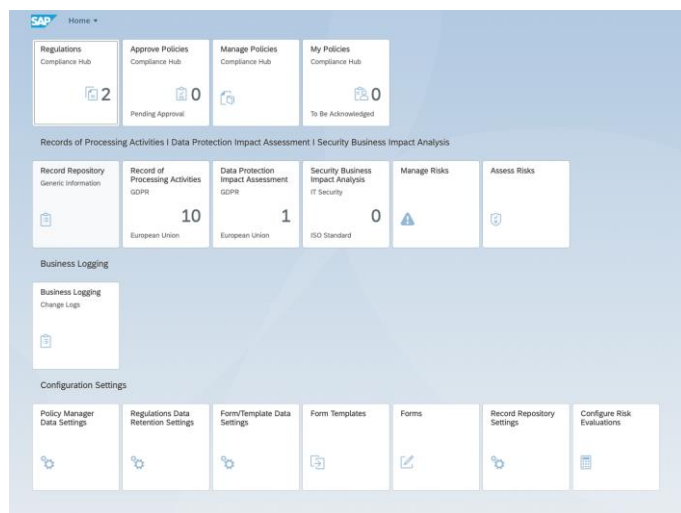


Privacy Governance @



SAP Privacy Governance

Record of Processing Activities,
Data Privacy Impact Assessment, Data
Subject Rights Request,
Risk Management & Mitigation Controls

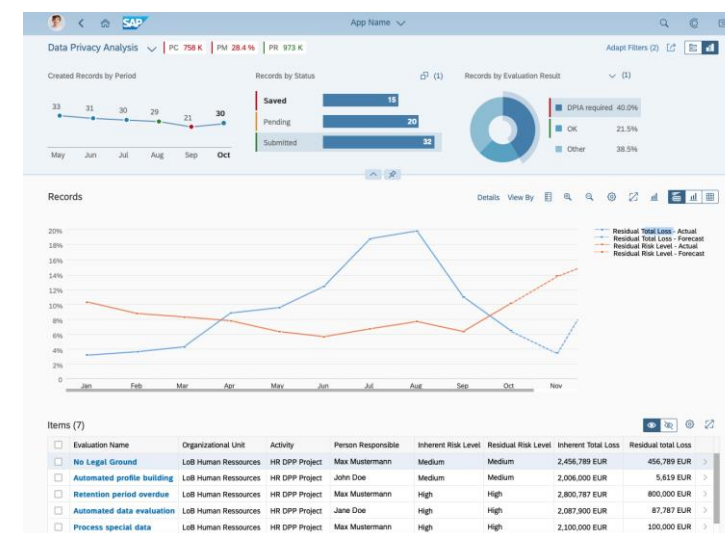


SAP Cloud Platform

Implementation,
Operationalization, Governance
& Process

SAP Analytics Cloud

Dashboards, Analytics and
Audit Reporting



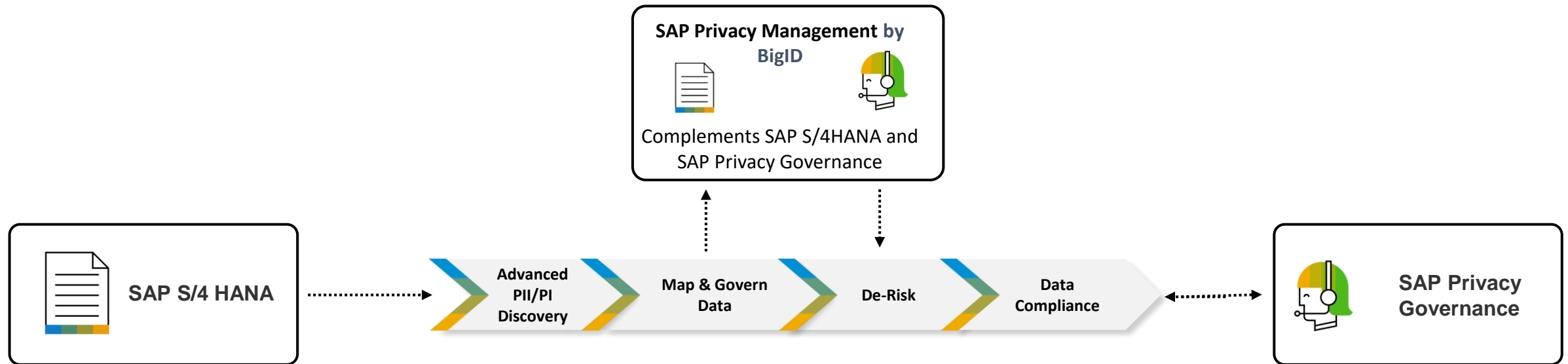
SAP Privacy
Management by BigID
Automated Data Discovery
and Inventory

SAP Privacy Governance & SAP Privacy Management by BigID Automated Data Discovery and Inventory

✓ **Find & Inventory** all personal data at scale

✓ **Map Data & Flow**, enable new analytics

✓ **Build & Measure** Data Risk KPIs



invested by [SAP.io](https://www.sap.io)



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Privacy Governance



SAP Cloud Platform

Implementation, Operationalization, Governance & Process

SAP Cloud Platform can help simplify and accelerate the digital transformation to a smart enterprise - delivering five key benefits in the process

- Seamless integration of existing solutions and hybrid system landscapes
- Rapid deployment of preconfigured applications and services
- Simple development of native business applications
- Holistic life-cycle management of all interfaces
- Consistent user experience

Privacy Governance



SAP Privacy Management by BigID

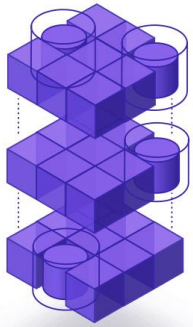
Automated Data Discovery and Inventory

- Automated Personal Data Discovery
 - Structured
 - Unstructured
 - Semi-Structured
- Personal Data Correlation
- Data Context Awareness
- Record of Processing Activities with SAP Privacy Governance
- Data Inventory
- Data Subject Rights Orchestration with SAP Privacy Governance
- Data Privacy Intelligence and Risk Determination
- Continuous Data Scanning and Compliance

SAP Privacy Management by BigID

Overview

invested by SAP.io



Advanced PII/PI Discovery

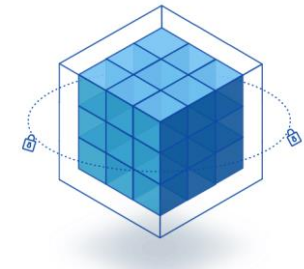
Find & Inventory All Personal Data At Scale.

- Patent-pending machine learning & identity intelligence technology.
- Identify all PII across structured, unstructured, cloud & Big Data.
- Inventory PII by data subject & residency for GDPR.
- Measure data re-identifiability for pseudonymization.
- Uncover dark or uncatalogued data.
- Fix data quality, visualize PII data relationships.

De-Risk & De-Identify

Build & Measure Data Risk KPIs.

- Measure risk by data sensitivity, location, access, consent etc.
- Customize multiple risk models tailored to internal audiences.
- Get actionable recommendations for security & privacy.
- Bubble up risky data & activities for attention.
- Assign investigation & remediation tasks.
- Tag files with risk parameters for enhanced DLP, DAM, DRM.



Map & Govern Data

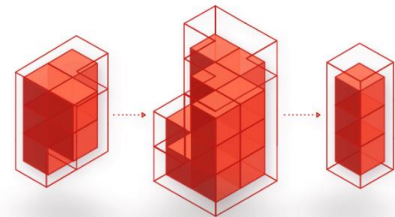
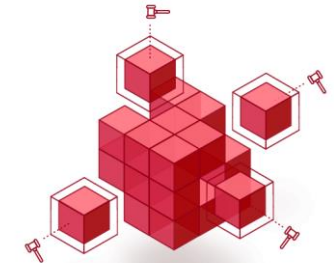
Map Data & Flow, Enable New Analysis.

- Build PII maps without any data copying or warehouse.
- Splunk-like analysis of PII by person, state, access, data type, etc.
- Collaboratively enrich PII records with purpose of use & retention.
- Supplement scanned data with built-in surveys.
- Document GDPR Article 30 with "living" data flow diagrams.
- Easily maintain data maps & flows for (D)PIAs.

GDPR & Data Compliance

Enhance Governance Through Better Analysis.

- Monitor compliance for regulations like GDPR.
- Manage data subject access requests & consent.
- Simplify regulator reporting.
- Identify breached data and compromised users.
- Test compliance against future data regulations.
- Enable devop compliance in agile environments.



Privacy Governance



SAP Privacy Governance

Workflow Automation, Standardization and Reporting

Key Capabilities:

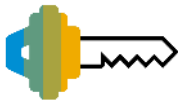
- Regulations Registry
- Policy Manager
- Record of Processes Activities (ROPA)
- Data Protection Impact Assessments (DPIA)
- Security Business Impact Assessments (SBIA)
- Data Subject Rights Access Requests (DSAR)
- Risk evaluation & mitigation
- Automated Privacy Procedures
- DPP Audit Hub
- Orchestration with BigID

Key Differentiators:

- Integrates seamlessly with existing client systems
- Purpose built solution for regulations such as GDPR and CCPA
- Built-in automated DSR workflows, KPIs/KRIs, dashboards/portals
- Built for multiple personas

SAP Privacy Governance

Product description



Key capabilities for multi-law frameworks

Governance and Policies

- Establish a governance framework
- Document regulations and disseminate privacy policies
- Record your personal data processing activities

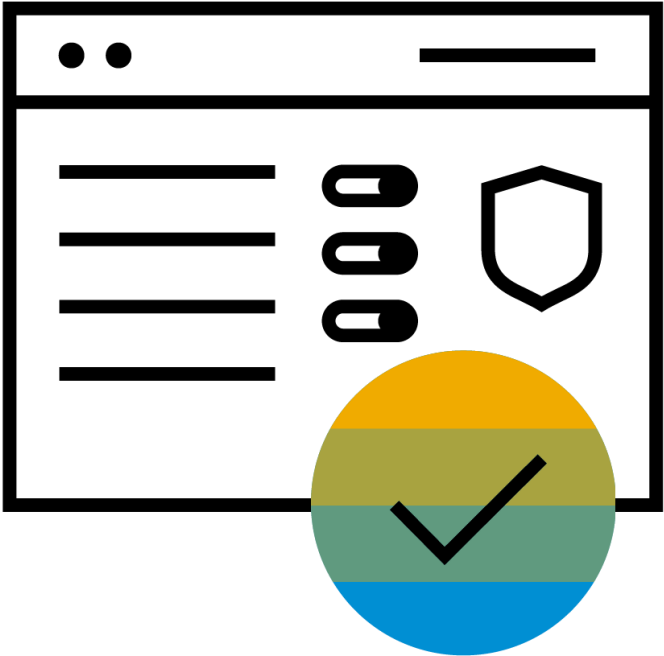
Assessment and Surveys

- Conduct data protection impact assessments
- Evaluate risks for personal data and flows
- Implement automated privacy procedures

Assurance and Reporting

- Report legal requirement compliance
- Provide risk and controls reporting
- Establish a insight-to-action process

GDPR Articles 30, 40	CCPA CSSL	ISO
GDPR Articles 5, 24, 35	CCPA CSSL	ISO
GDPR Articles 6, 24, 32	CCPA CSSL	ISO



SAP Privacy Governance

Manage regulations and policies



Chapter IV GDPR

Data controller and processor obligations

Relates to article 40 of GDPR



Description

Facilitate the setup of a compliance system

- Document regulations
- Define specific legal requirements
- Distribute policies
- Acknowledge policies

The screenshot displays the SAP Privacy Governance user interface. On the left, a 'Regulations (54)' list shows various entries with columns for Name, Validity Period, Status, and Created By. The middle pane shows details for 'EU-GDPR' (Data Protection -1902-1712), including its status as 'Draft', category, validity period, and description. The right pane shows the 'New Requirement' form, which includes fields for 'Name' (Rights of the data subject - Transparency and modalities) and 'Description' (GDPR Chapter 3, Section 1, Article 12). At the bottom right, there are 'Create' and 'Cancel' buttons.

Name	Validity Period	Status	Created By
ID: Data Protection -1902-1712			
EU-GDPR	Feb 13, 2019 - Dec 31, 9999	Draft	yuankai.fan@sap.com
ID: Data Protection -1902-2609			
JEFF-TEST-23-SOX-COPY--NEWTIME	Feb 12, 2019 - Dec 31, 9999	Draft	jeff.li01@sap.com
JEFF-TEST-23-SOX-COPY	Feb 12, 2019 - Dec 31, 9999	Published	jeff.li01@sap.com
ID: Data Protection -1902-5699			
GDPR	Jan 1, 2020 - Dec 31, 9999	Retired	yaxi.hu@sap.com
GDPR	Feb 1, 2019 - Dec 31, 2019	Retired	yaxi.hu@sap.com
ID: FDA-1901-1964			
Yaxitest1	Jan 2, 2019 - Dec 31, 2019	Retired	yaxi.hu@sap.com

SAP Privacy Governance

Manage regulations and policies



Value drivers

- Establishing the frame for a compliance system
- Easy access of relevant regulations
- Documented deduction of detailed requirements
- Easy distribution of policies and documented acknowledgements
- Streamlined policy management lifecycle with clear, established responsibilities
- Leveraging of e-mail or mobile options to make policy distribution and acceptance easier and faster



Chapter IV GDPR

Data controller and processor obligations

Relates to article 40 of GDPR

The screenshot displays the SAP Privacy Governance user interface. On the left, a sidebar shows the 'Data Privacy&Protection' policy with details: Category: Security, Language: English, Publication Date: May 4, 2018, and Description: This is a policy for Data Privacy & Protection. Below this, two attachments are listed: 'Enrollment with Record of Processing Activities (RoPA)-EN. pdf' (120 KB) and 'Global Data Protection and Privacy Guideline V2 final.pdf' (650 KB). The main content area displays the selected policy document, 'Enrollment with Record of Processing Activities (RoPA)-EN. pdf'. The document content includes a 'Please note' section stating that all procedures must be documented in the 'Record of Processing Activities (RoPA)'. It then details the 'Why' (legal requirement of the EU GDPR), 'What' (documentation in a procedure register), 'Who' (procedure owner), 'Where' (accessed through the RoPA application), and 'Where' (context of each question including general hints regarding data protection). The interface includes a top navigation bar with 'My Policies' and a search icon, and a right sidebar with zoom controls.

SAP Privacy Governance

Evaluate records of processing and identify risks



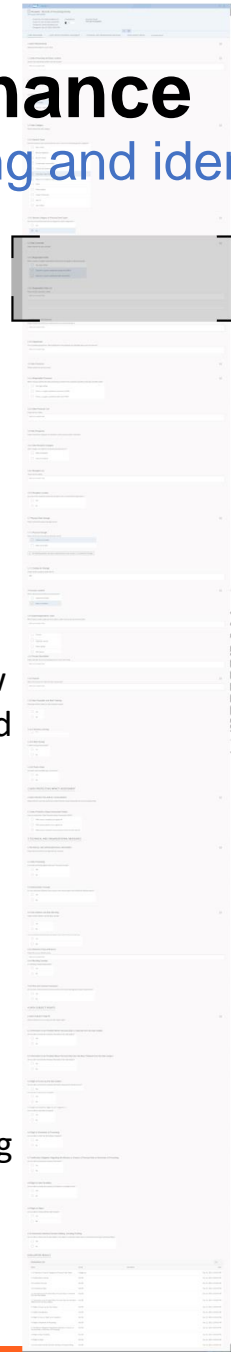
Chapter IV GDPR

Data controller and processor obligations

Relates to article 30 of GDPR
Records of processing activities



Description



Reduce risk of GDPR noncompliance

- Article 30 of GDPR requires a record of processing activities (ROPA).
- Possibility to interlink SPM by BigID data flow ID to connect inductive with deductive record information
- ROPA is connected to an evaluation microservice.
 - Data protection officer (DPO) approved collection of procedures
 - Centrally maintained field collection
 - Survey-based information collection in business units
 - Central monitoring, reporting, and auditing

Hire to Retire
Record of Processing Activity (ROPA)

Created By: John Doe
Created On: Dec 2, 2019, 2:10:24 PM
Changed By: Jane Doe
Changed On: Dec 3, 2019, 10:29:12 AM

Completeness: 91%
Evaluation Result: DPIA required

1 DATA PROCESSING | 2 DATA PROTECTION IMPACT ASSESSMENT | 3 TECHNICAL AND ORGANIZATIONAL MEASURES | 4 DATA SUBJECT RIGHTS | Evaluation Result

1.7 Physical Data Storage
Please indicate the physical storage location

1.7.1 Physical Storage
Where will the personal data be physically stored?

☒ Outside the EU/EEA
☒ Within the EU/EEA

The following question has been enabled based on your answer: 1.7.2 Outside EU Storage

1.7.2 Outside EU Storage
Please list the countries outside the EU:

USA

1.8 Access Location
Where will the personal data be accessed from?

☒ Outside the EU/EEA

SAP Privacy Governance

Risk-evaluate data protection impact assessments



Description

Reduce risk of GDPR noncompliance

- Article 35 GDPR requires a data protection impact assessment (DPIA) if certain conditions are fulfilled.
- DPIA is connected to an evaluation microservice.
 - DPO-approved collection of risks
 - Centrally maintained field collection
 - Survey-based information collection in business units
 - Central monitoring, reporting, and auditing



Chapter IV GDPR

Data controller and processor obligations

Relates to article 35 of GDPR
Data protection impact
assessment

SAP Privacy Governance

Risk-evaluate data protection impact assessments



Value drivers

- Automated evaluation of DPIA completeness to the contributor
- Enablement of integrated early-risk assessment for the DPO
- Automatically calculated risk levels
- Predefined sample content, uploadable and changeable
- Status management
- Support for linking with ROPA records



Chapter IV GDPR

Data controller and processor obligations

Relates to article 35 of GDPR
Data protection impact assessment

SAP Forms

Hire to Retire
Data Protection Impact Assessment (DPIA)

Created By: John Doe
Created On: Dec 3, 2019, 9:25:33 AM
Changed By: Jane Doe
Changed On: Dec 3, 2019, 10:23:09 AM

Completeness: 89%
Evaluation Result: Not High Risk

1 GENERAL INFORMATION | 2 GENERAL RISK EVALUATION | 3 THIRD PARTY | 4 SECURITY OF PROCESSING | 5 CHANGE MANAGEMENT | Evaluation Result

Evaluations (12)

Name	Result	Description	Date
2.1 Confidentiality Breach	Not High		Dec 3, 2019, 10:23:09 AM
2.3 Integrity Breach	Not High		Dec 3, 2019, 10:23:09 AM
2.5 Availability Breach	Not High		Dec 3, 2019, 10:23:09 AM
2.7 Information to be Provided Where Personal Data is Collected From the Data Subject	Not High		Dec 3, 2019, 10:23:09 AM
2.9 Right of Access by the Data Subject	Not High		Dec 3, 2019, 10:23:10 AM
2.11 Right to Rectification	Not High		Dec 3, 2019, 10:23:10 AM
2.13 Right to Erasure ('Right to be Forgotten')	Not High		Dec 3, 2019, 10:23:10 AM
2.15 Right to Restriction of Processing	Not High		Dec 3, 2019, 10:23:10 AM
2.17 Notification Obligation Regarding Rectification or Erasure of Personal Data or Restriction of Processing	Not High		Dec 3, 2019, 10:23:10 AM
2.19 Right to Data Portability	Not High		Dec 3, 2019, 10:23:10 AM
2.21 Right to Object	Not High		Dec 3, 2019, 10:23:10 AM
2.23 Automated Individual Decision-Making, Including Profiling	Not High		Dec 3, 2019, 10:23:10 AM

Save Submit Evaluate

SAP Privacy Governance

Risk-evaluate data protection impact assessments



Chapter IV GDPR
Data controller and processor obligations

Relates to article 35 of GDPR
Data protection impact assessment



Value drivers

- Support Flexible Risk Assessment
- Multiple Sources
- Probability Definitions
- Impact Definitions
- Predefined sample content, uploadable and changeable
- Status management

Assess Risks

Standard *

Filtered By (2): Editing Status, Version Status

Assessments (14)

Name

Version

Source

Source Object:

Version Status: Not Activated

Risk:

Valid From:

Valid To:

Created At:

Changed At:

Risk: PM Risk 1A (5)

PM Risk 1A 2.0

DPIA 1234ABCD

Source Object: DPIA Record

Version Status: Not Activated

Risk: PM Risk 1A

Valid From:

Valid To:

Created At:

Changed At:

Source Object: AA, BB

Version Status: Not Activated

Risk: Some Risk

Valid From: Nov 12, 2019

Valid To: Nov 29, 2019

Created At: Nov 28, 2019, 9:21:34 AM

Changed At: Nov 28, 2019, 9:21:34 AM

Impacts

General Information

Description

Risk Source

Risk Analysis

Impacts

Items (1)

Category

Analysis Method

Customer Satisfaction

Qualitative

Analysis Types

Items (3)

Analysis Type

Probability

Risk Level

Vulnerability

Impact

Frequency

Inherent

Low

High

High

Very High

High

Planned

Low

Medium

High

High

Medium

Residual

High

High

Medium

Very High

High

SAP Privacy Governance

Detect compliance breaches and high risks through automated privacy procedures

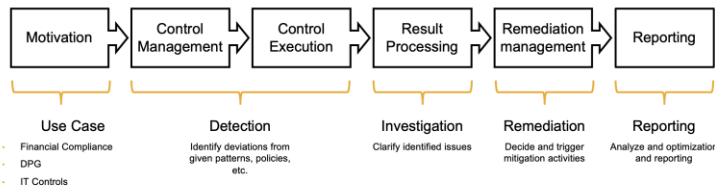
Future (1H 2020)



Description

Reduce risk of GDPR noncompliance

- Definition of detection procedures
- Mitigation of findings through insight into action procedures



The screenshot displays the SAP Privacy Governance interface. The top navigation bar includes the SAP logo and the title "Manage Work Packages". The main content area is divided into three panels. The left panel shows a list of Work Packages (3) with filters for Name, Status (Draft), and Work Package IT Security. The middle panel shows the "Work Package Data Protection" details, including a calendar view for Q1, 2019 and Q2, 2019, and a list of Controls & Procedures. The right panel shows the results of a run from April 1, 2019, to July 1, 2019, with a status of "Completed with Error".

Work Package Data Protection

00000001

Scheduled Runs (4)

Q1, 2019: Jan, Feb, Mar, Apr, May

Q2, 2019: Apr, May

Controls & Procedures

Add Control Add Procedure Delete

- Name
- Data Minimization
 - Sales Documents exc ...
 - Define retention rules ...
- Usage Restriction
 - EoP Business Partner ...
 - Document Processin ...
- Access Control
 - SoD Check
 - Authorization Concept

Run: Apr 1, 2019 - Jul 1, 2019

Status: Completed with Error

Completed (10) Error (2)

Name	Result	Procedure Type	Control
Result: Failed			
Sales Documents exceeds the retention period	Failed (11)	Automated	Data Minimization
Define retention rules for new sales organization	Failed (500)	Manual	Data Minimization
Result: Passed			
EoP Business Partner in usage	Passed	Automated	Usage Restriction
Document Processing Purpose	Passed	Manual	Usage Restriction
SoD Check	Passed	Automated	Access Control
Authorization Concept	Passed	Manual	Access Control
Overdue Data Subject Requests	Passed	Automated	Data Subject Rights
Data Subject Rights by Design	Passed	Manual	Data Subject Rights
Data Encryption	Passed	Automated	Data Security
Password Policy for new Apps	Passed	Manual	Authentication

SAP Privacy Governance

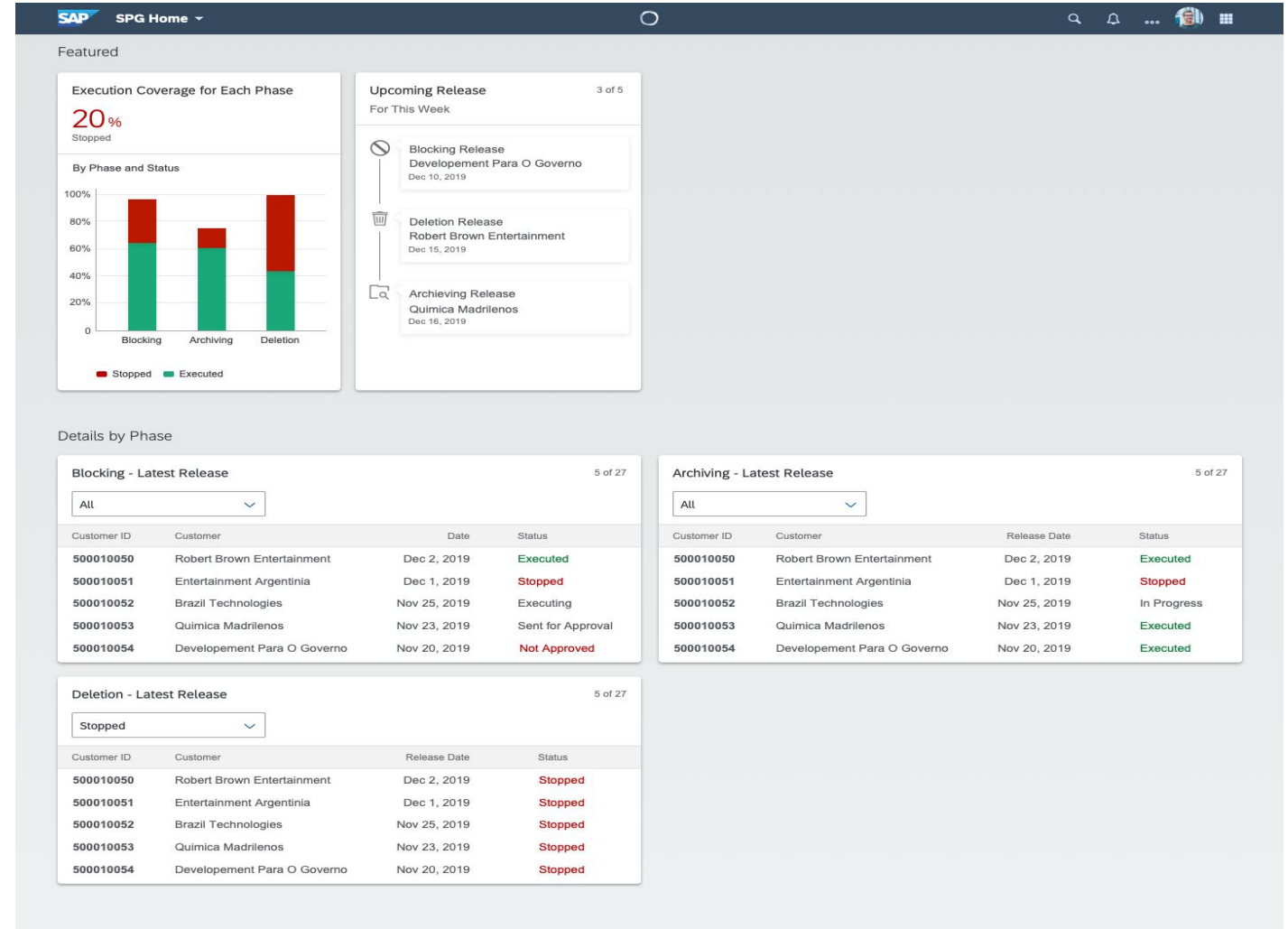
Detect compliance breaches and high risks through automated procedures

Future (1H 2020)



Value drivers

- Automated proactive detection of risks and issues
- Integration to manual mitigation procedure
- Support for Information Lifecycle Mgmt. and Audit



SAP Privacy Governance

Collect Data Subjects Requests and Automate Rights Execution

Future (1H 2020)



Description

Reduce risk of GDPR noncompliance

- Data Subject Rights Self Service
- Automated Data Subject Rights Execution
- Workflow enablement for Approvals
- Integrated scenario with the possibility to use SAP CDC as branded frontend and SPM by BigID as data detection service
- Standalone connection capabilities to SAP S/4 and Business Suite

The screenshot displays a web application interface for SAP Privacy Governance. At the top, a navigation bar includes icons for 'Intelligent Enterprise', 'Experience Management', 'Small and Midsize Businesses', 'Try & Buy', 'Developer', and 'Community'. The main content area features a 'Data Subject Rights Access Request' form. The form fields are as follows:

- First Name:
- Last Name:
- Street / No.:
- Postal Code / City:
- Email:

At the bottom right of the form, there are 'Submit' and 'Close' buttons. The background of the interface shows a blurred image of a tractor in a field. A 'Contact Us' button is visible on the right side of the background image. At the bottom of the page, there is a quote: "We're really excited for the future of this collaboration with SAP and to help us make a difference..." and logos for 'Rainforest Connection', '9', and 'B&B'.

Privacy Governance



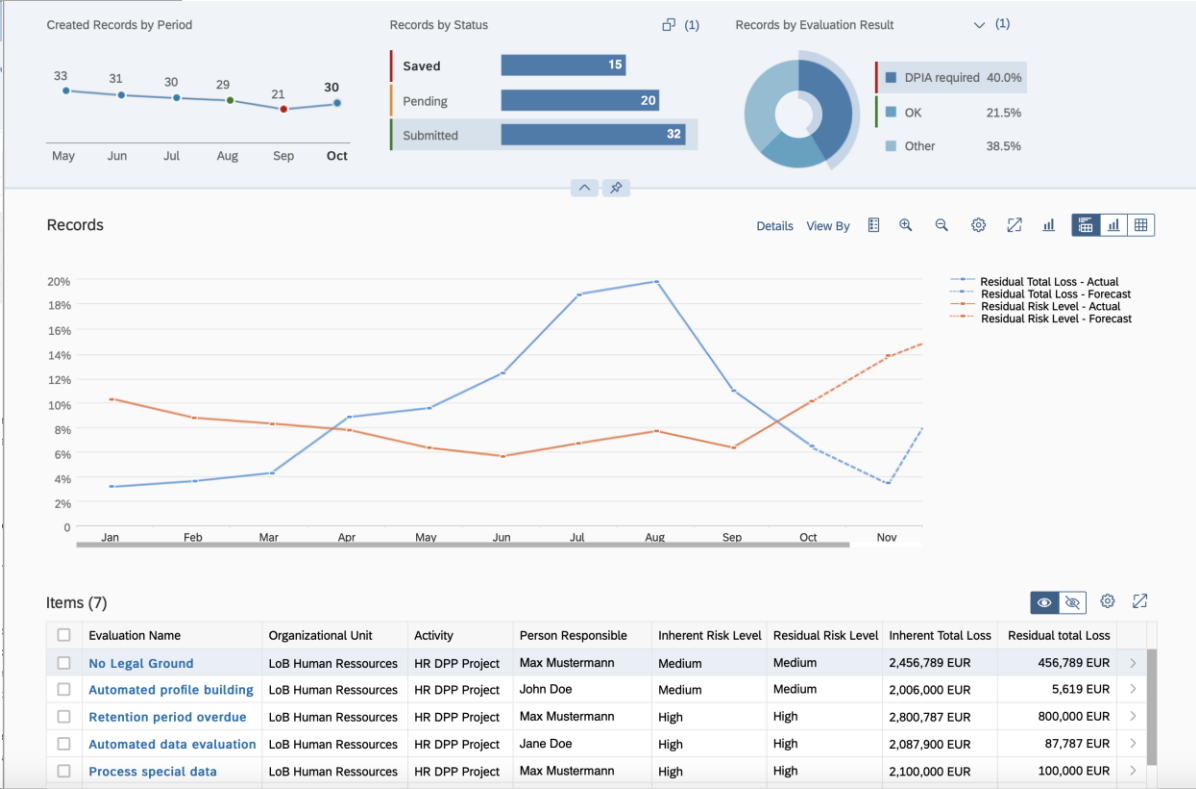
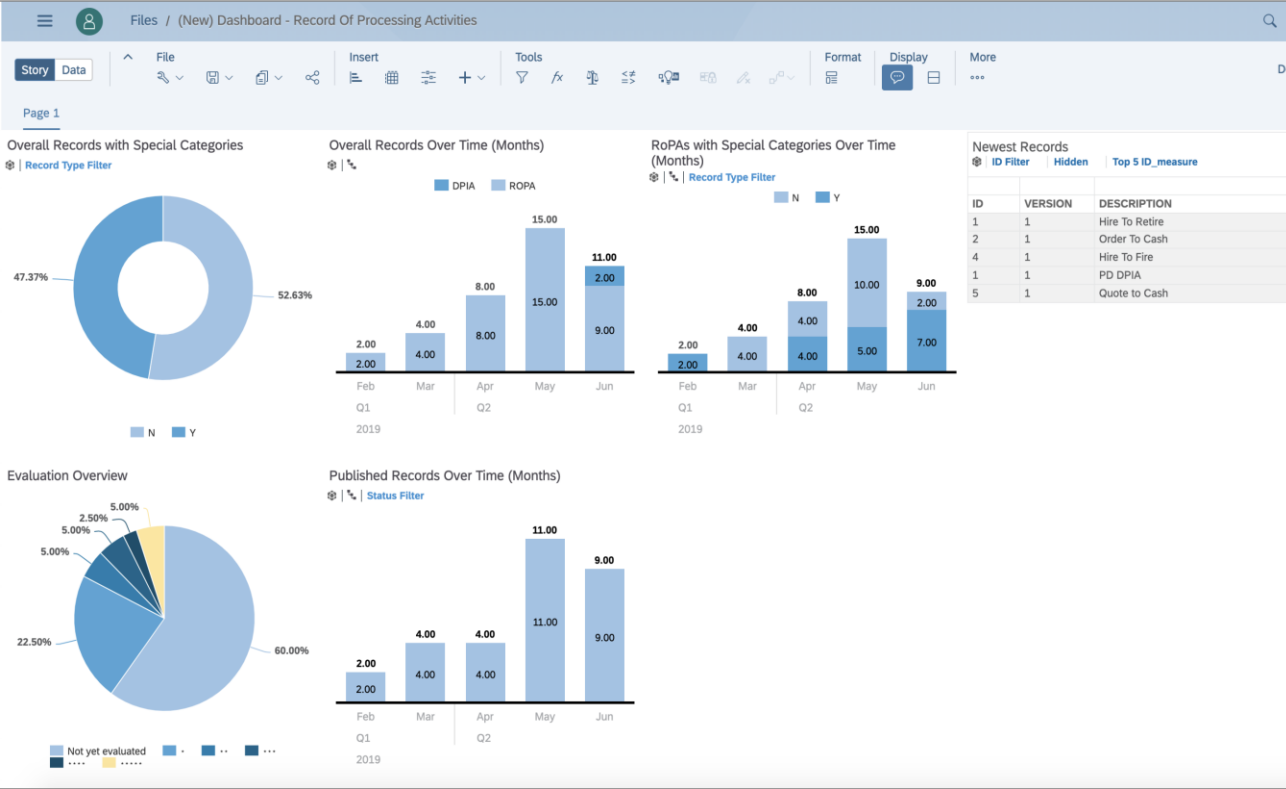
SAP Cloud Analytics

Dashboards, Analytics & Audit Reporting

- Better fact-based decision making and improved business performance.
- Best use of data with the integrated organizational planning features.
- More effective use of analytics with extensibility across devices and applications. Automatically analyze data, revealing key influencers and support what-if scenarios and simulations.
- Future-ready with a cloud analytics solution built to handle enterprise-level Internet of Things data.
- Simplified financial planning and analysis.
- Easy communication amidst employees in the organization within Analytics Cloud by adding comments to visualizations, replying and liking comments.
- Deliver consistent, accurate insights to the business that is conveniently accessible in the cloud.
- Faster ROI and higher value from existing investments.
- Embed collaboration tools and analytics directly into your planning processes, so you never have to switch between applications again.

SAP Privacy Governance

Customized Analytics through SAP Analytics Cloud



Questions?

For questions after this session, contact us at Sandro.Lovisa@sap.com

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