

Privacy Statement for SAP LeanIX

This Privacy Statement was updated on August 18, 2026.

We have created this Privacy Statement to demonstrate the firm commitment of SAP (hereinafter "We", "SAP", "Us" or "Our") to individuals' data protection and privacy rights. It outlines how SAP processes information that can be used to directly or indirectly identify an individual (hereinafter "Personal Data"). Processing in the context of this Privacy Statement means any collection, use, transmission, disclosure, erasure or any other similar operation based on Personal Data (hereinafter "Processing" or "Process").

SAP processes information, including Personal Data, about the users of www.leanix.net (and relevant subdomains) using cookies or similar technologies for the purposes set out in the [Cookie Statement](#).

Which is the responsible entity?

The controller of this website is SAP SE, Dietmar-Hopp-Allee 16, Walldorf 69190, Germany. This Privacy Statement applies to the collection and processing of personal data:

- during the central operation of this website and other globally operated business activities by
 - SAP SE, Dietmar-Hopp-Allee 16, Walldorf 69190, Germany if you are in a member state of the EU or the EEA, Andorra, Faroe Islands, Guernsey, Isle of Man, Jersey, Switzerland, or the United Kingdom or by
 - SAP America Inc., 3809 West Chester Pike, Suite 200, Newtown Square, PA 19073, USA if you are in any other country, or
 - a specific SAP group entity as may be stated in the Additional Country and Regional Specific Provisions at the end of this privacy statement.
- in the context of a pre-contractual or contractual business relationship with you or your employer by a local SAP group entity
- in the context of a registration form when a specific SAP group entity is directly collecting personal data for the purpose of registering for a service or event and is therefore presented as the relevant controller on this registration page or website by referencing to this privacy statement. Where a registration form is presented on this website, the controller may vary depending on the actual offering or the purpose of the data collection, but it is in any case displayed on the individual registration form's privacy statement.

You can reach SAP Group's data protection officer any time at [privacy\[@\]sap.com](mailto:privacy[@]sap.com).

What is the purpose of processing your Personal Data and based on what is legal basis for doing so?

Depending on the applicable law, the Processing of Personal Data may be subject to a requirement to state and justify the reason for processing, sometimes referred to as the 'legal basis'.

SAP's compliance with statutory obligations

- SAP processes your Personal Data for the purpose of ensuring an adequate level of technical and organizational security of SAP's products, services, online events, facilities, and premises. For this, SAP will take the measures necessary to verify or maintain the quality and safety of a product or service which is owned, manufactured by or for, or controlled by SAP. This may comprise the use of Personal Data for sufficient identification and authorization of designated users, internal quality control through auditing, analysis, and research, debugging to identify and repair errors that impair existing or intended functionality, account and network security, replication for loss prevention, detecting security incidents, protection against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for such kind of activity. We may further process your name, likeness, and other contact or compliance related data when you visit a local SAP or SAP affiliate or lab in the context of access management and video surveillance to protect the security and safety of Our locations and assets.
- SAP processes Personal Data (name, surname, country, IP address) to the extent necessary to fulfil sanctions and embargo requirements under European Economic Area ("EEA") laws to which SAP is subject, and laws and regulations extraterritorial to the EEA (based on SAP's legitimate interest).
- Where necessary, SAP uses Personal Data to prevent or prosecute criminal activities such as any form of cybercrime, the illegal use of Our products and services or fraud, to assert Our rights or defend SAP against legal claims.
- To comply with data protection and privacy laws (e.g. to respond to your data subject request) and unfair competition laws. Depending on the country in which the relevant SAP Group company operates, SAP may process Personal Data necessary to accommodate your data protection and privacy choices for the receipt of such information and, when necessary to ensure compliance, exchange such information with the other entities of the SAP Group.

When ensuring compliance, SAP processes your Personal Data if and to the extent necessary to fulfill legal requirements under European Union, EU Member State or other applicable law or regulation to which SAP is subject (legitimate interest to comply with extraterritorial laws and regulations).

SAP's Web Services

SAP processes your Personal Data to operate web presences, web offerings, or online events ("Web Services")

- to provide the Web Services and functions, create and administer your online account, updating, securing, troubleshooting the service, providing support, improving, and developing the Web Services, answering and fulfilling your requests or instructions.
- to manage and ensure the security of Our Web Services and prevent and detect security threats, fraud or other criminal or malicious activities and as reasonably necessary to enforce the Web Services terms, to establish or preserve a legal claim or defense, to prevent fraud or other illegal activities, including attacks on Our information technology systems.
- to create specific user profiles that may be specific to a single Web Service of SAP, but also allows you to access SAP's other Web Services. It is your choice whether or not to use any of these additional Web Services. If you do, SAP will make your Personal Data available to such other Web Service to provide you with initial access. Kindly note that without your consent for SAP to create such user profiles, SAP will not be able to offer such services to you where your consent is a statutory requirement that SAP can provide these services to you. to process information that relates to your visit to Our Web Services to improve your user experience, identify your individual demand and to personalize the way We provide you with the information you are looking for. For this purpose, We collect information regardless of whether you register with a user profile or not. to create specific user profiles that may be specific to a single Web Service of SAP, but also allows you to access SAP's other Web Services. It is your choice whether or not to use any of these additional Web Services. If you do, SAP will make your Personal Data available to such other Web Service to provide you with initial access. Please note that without your consent for SAP to create such user profiles, SAP will not be able to offer such services to you where your consent is a statutory requirement that SAP can provide these services to you.
- to share basic participant information (your name, company, and email address) with other participants of the same event, seminar, or webinar to promote the interaction between the participants and stimulate the communication and the exchange of ideas.

When operating SAP's Web Services, SAP processes your Personal Data if and to the extent:

- SAP obtained your consent, if required by law, to process your Personal Data for this purpose;
- Necessary to fulfill (pre-)contractual obligations with you;
- necessary to fulfill legal requirements applicable to SAP; and
- necessary to pursue SAP's legitimate interest to efficiently perform or manage SAP's Web Services and business operation and assert or defend itself against legal claims. We believe that SAP's interest in pursuing these business purposes is legitimate and thereby not outweighed by your personal rights and interest to refrain processing for such purpose. In any of these cases, We duly factor into Our balancing test: the business purpose reasonably pursued by SAP in the given case, the categories, amount and sensitivity of Personal Data that is necessarily being processed, the level of protection of your Personal Data which is ensured by means of Our general data protection policies, guidelines, and processes, and the rights you have in relation to the processing activity.

SAP's business relationships

SAP processes Personal Data to pursue its business relationships with customers, partners, and others to fulfill pre-contractual and contractual business relations. This may include satisfying requests, processing orders, delivering an ordered product or service, or engaging in any other relevant action to establish, fulfill and maintain Our business relationships.

- **Products and services** may include any of SAP's on-prem and cloud software products, web services, apps, online-forums, webinars and events, nonmarketing related newsletters, white papers, tutorials, trainings, as well as other offerings like contests or sweepstakes. When you purchase or intend to purchase products or services from SAP on behalf of a corporate customer or are otherwise associated as contact person for the business relationship between SAP and a corporate customer or partner ("Customer Contact"), SAP will use your Personal Data for this purpose. More specifically, SAP may use your Personal Data to confirm your opening of an account, manage the contract execution, send you disclosures as may be required by law, notice of payments, and other information about Our products and services. SAP may respond to related inquiries, provide you with necessary support and process your feedback. In the context of your or your employers use of Our products or services, SAP may communicate with you by post, email, live chat, contact forms, phone or any other medium to resolve your, a user's, or a customer's question or complaint or to investigate suspicious

transactions. In case of telephone calls or chat sessions, SAP may record such calls or chat sessions to improve the quality of SAP's services after informing you accordingly during that call and, subject to applicable law, receiving your prior consent before the recording begins.

- **Customer Satisfaction:** Within an existing business relationship between you or your employer and SAP, SAP processes your Personal Data to help Us understand how satisfied you are with the functionality and quality of Our products and services, to provide you with relevant information on Our latest product announcements, software updates or upgrades, events, special offers, and other information about SAP's software and services that is relevant and useful to you
- **To keep you up to date:** Within an existing business relationship between you or your employer and SAP, SAP processes your Personal Data to inform you about SAP's products or services which are similar or relate to products and services you or your employer have already purchased or used. SAP will inform you by email or phone about such news only as far as it is allowed by law, or if SAP has collected such information in the context of the business relationship. You are entitled to object to SAP's use for this purpose at any time by selecting the optout option at the bottom of each marketing related approach. We aim to keep customers and prospects updated on upcoming events and SAP's latest products and services. Further, We also desire to keep Our customers and partners satisfied with Our products and services and therefore ask them on a regular basis for their feedback. If possible, We may contact you to discuss further your interest in SAP services and offerings.
- **Feedback requests and surveys:** To the extent allowed by applicable law, SAP may contact you for feedback regarding the improvement of the relevant material, product, or service. SAP may also invite you to participate in questionnaires and surveys. These will generally be designed so you can participate without having to provide information that identifies you as a participant. If you nonetheless provide your Personal Data, SAP will use it for the purpose stated in the questionnaire or survey or to improve its products and services.
- **Personalized Content:** SAP processes information about your interactions with SAP across its various business areas and its offerings (your or your employers prior and current use of SAP products or services, your participation in and use of SAP's web offerings, events, white papers, free trials or newsletters) to provide you with the requested products and services and to improve Our personal communications with you. This data may also be used to efficiently operate SAP's business, which also includes: the automation and aggregation of data to support various analytic and statistical efforts, performance and predictive analytics and exploratory data

science to support your customer journey and to fulfill such requests. To the extent permitted by law, SAP may combine and use such information in an aggregated manner to help Us understand your interests and business demands, develop Our business insight and marketing strategies, and to create, develop, deliver, and improve Our personalized communications with you. It may also be used by SAP to display relevant content on SAP owned or third party websites.

- **Advertising ID's:** SAP may create a hashed user ID to provide to third party operated social networks or other web offerings (such as Twitter, LinkedIn, Facebook, Instagram or Google). This information is then matched against the third party's own user database to display to you more relevant SAP content.

When pursuing business relationships including engaging in direct marketing and sales activities, SAP may process your Personal Data if and to the extent:

- it is covered by your consent, provided your consent is required by law for SAP to process your Personal Data for this purpose;
- if necessary to fulfill (pre-)contractual obligations with the company or other legal body you represent as a customer contact (legitimate interest to efficiently perform or manage SAP's business operation), to maintain Our business relationships with you or your employer, to ensure your satisfaction as a user or customer contact, to map the relevant group internal structures and bundle relevant business activities at central sources within the SAP Group to operate them uniformly and to provide you with information about other SAP products and services as indicated by your interest or demand, which may also comprise the combination about you from different sources (profiling) (legitimate interest to maintain and operate intelligent and sustainable business processes in a group structure optimized for the division of labor and in the best interest of Our employees, customers, partners, and shareholders and to operate sustainable business relationship with SAP customers and partners). SAP may provide you with this information using your postal address to pursue Our legitimate interest to address customers, prospects and targets for the purpose of advertising Our products and services, or using your email address for the purpose of direct marketing of similar products or services provided that We (i) received your email address in connection with the purchase of Our products or services, (ii) you did not object to the use of your email address for direct advertising and (iii) and We inform you in every approach that you may object to Our use of your email address for marketing purposes at any time, and by other electronic means (e.g., telephone, MMS) to the extent permitted under applicable law, generally either explicit or presumed consent;

- the contract or pre-contractual relationship relates to a company or other legal entity and if SAP processes your Personal Data as Customer Contact to fulfill (pre-) contractual obligations with your employer (legitimate interest to efficiently perform or manage SAP's business operation); and
- to maintain Our business relationships with you, ensure your satisfaction as a user or customer representative, 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).

What categories of Personal Data does SAP process?

SAP processes various types of personal data about the people we interact with when conducting our business or operating our various web presences and other communication channels. Depending on the individual case, this may comprise the following types of personal data:

Contact Data:

SAP processes the following categories of personal data as contact data: first name, last name, email addresses, postal address/location (country, state/province, city), telephone numbers, and your relationship history with SAP.

Personal data related to the business relationship with SAP:

In the context of established business relationships, SAP processes the business partner's company name, industry, your job title and role, department and function and your company's relationship history to SAP. If you provide a credit card number or bank details to order products or services, SAP will collect this information to process your payment for the requested products or services.

Compliance-related personal data:

If required by statutory law or regulation, SAP may process data categories like academic credentials, geolocation, business partner relevant information about e.g., significant litigation or other legal proceedings, and other export control or custom compliance relevant information.

Data generated through your use of, or participation in SAP's internet pages, web, or online offerings:

Usage data: SAP processes certain user-related information, e.g., info regarding your browser, operating system, or your IP address when you visit SAP's web properties. We also process information regarding your use of our web offerings, like the pages you visit, the amount of time you spend on a page, the page which has referred you to our page and the links on our sites you select.

Registration data: SAP may process your contact data as set out above and other information which you may provide directly to SAP if you register for any of SAP's events or other web services.

Participation data: When you participate in webinars, virtual seminars, events, or other SAP web services, SAP may process your interactions with the relevant webservice to organize the event including its sessions, polls, surveys, or other interactions between SAP and/or its participants. Depending on the event and subject to a respective notification of the participants, SAP may collect audio and video recordings of the event or session.

Special categories of personal data:

In connection with the registration for an event, SAP may ask for your dietary preferences or information about possible disabilities for purposes of consideration for the health and well-being of our guests. Any collection of such information is always based on the consent of the participants. Kindly note that if you do not provide such information about dietary preferences, SAP may not have the opportunity to respond to such requests at the time of the event.

Personal data received during an application for a job at SAP:

SAP processes personal data of individuals applying for a job at SAP as set out in the privacy statement of the [SAP Career Portal](#) or equivalent website.

Personal data necessary for customer satisfaction:

To the extent permitted by law or based on your consent, SAP may combine the information we collect either directly or indirectly about specific users to ensure the completeness and correctness of the data and to help us better tailor our interactions with you and determine the information which best serves your respective interest or demand.

If SAP processes special or sensitive categories of Personal Data as defined under applicable law, SAP will ask you for your consent in a specific declaration.

Types of Third Parties from which SAP may obtain Personal Data?

SAP generally aims to collect Personal Data directly from you. If you are obliged by statutory law or contractual requirements to provide Personal Data to SAP and you fail to provide such Personal Data, then please note that SAP may not be able to provide you with the respective service and/or business relationship. If you or applicable law allows Us to do so, We may also obtain Personal Data from third parties which may include:

- your employer in the context of its business relationship with SAP and/or the SAP Group;
- Third Parties you directed to share your Personal Data with SAP, and

- third-party sources and publicly available sources like business-oriented social networks or information brokers

When We collect Personal Data from Third Parties, established internal controls aim to ensure that the third-party source was permitted to provide this information to SAP and that We may use it for this purpose. SAP will treat this Personal Data according to this Privacy Statement and any additional restrictions imposed by the third party that provided the Personal Data to SAP or by applicable law.

How long does SAP store your Personal Data?

SAP will retain your Personal Data until the end of the relevant retention period or until the claims in question have been settled. SAP does only store your Personal Data for as long as it is required:

- for SAP to comply with statutory obligations to retain Personal Data, resulting inter alia e.g. from applicable export, finance, tax or commercial laws.
- for the performance of a contract between you and SAP.
- to fulfill SAP's legitimate business purposes as further described in this Privacy Statement, unless you object to SAP's use of your Personal Data for these purposes.
- To process your Personal Data for this purpose and SAP obtained your consent, if required by law.

SAP may retain your Personal Data for additional periods if necessary for compliance with legal obligations to process your Personal Data, or if the Personal Data is needed by SAP to assert or defend itself against legal claims.

Who are the recipients of your Personal Data?

Your Personal Data may be transferred to or accessed by the following categories of third parties to process your Personal Data:

SAP Group entities:

Other entities of the SAP Group may also receive or gain access to Personal Data either when rendering group internal services centrally and on behalf of SAP and the other SAP group entities or when Personal Data is transferred to them on a respective legal basis. In these cases, these entities may process the Personal Data for the same purposes and under the same conditions as outlined in this Privacy Statement. The current list of SAP Group entities can be found [here](#).

Service providers:

Third-party service providers: SAP may engage third-party service providers to process personal data on SAP's behalf, e.g., for consulting or other services, the provision of the website, the

fulfillment and provisioning of offers from SAP or newsletter dispatch. These service providers may receive or are granted with access to personal data when rendering their services and will constitute recipients within the meaning of the relevant data protection law, including GDPR.

What are your data protection rights and how can you exercise them?

SAP honors your statutory rights when it comes to the Processing of your Personal Data. To the extent provided by applicable data protection laws, you have the right to:

- access your Personal Data that we have on you, or have it updated.
- Data portability of the Personal Data you provided to SAP, if SAP uses your Personal Data based on your consent or to perform a contract with you. In this case, please contact privacy@sap.com and specify the information or processing activities to which your request relates, the format in which you would like to receive the Personal Data, and whether it should be sent to you or another recipient. SAP will carefully consider your request and discuss with you how it can best be fulfilled.
- Delete Personal Data we hold about you. 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 that SAP 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;
- Object against SAP further processing your Personal Data, if and to the extent SAP is processing your Personal Data based on its Legitimate Interest. When you object to SAP's processing of your Personal Data, 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 Personal Data, which may override your interest in objecting, or if SAP requires the information for the establishment, exercise, or defense of legal claims;
- Right to object to direct marketing or to opt out of profiling in relation to direct marketing. When you object to SAP's processing of your Personal Data for direct marketing purposes, SAP will immediately cease to process your personal data for such purposes;
- 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). Where 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;

- Not to be subject to a decision based solely automated means, if the decision produces legal effects concerning you or significantly affects you in a similar way;
- To request SAP restrict your Personal Data from further processing where:
 - you state the Personal Data about you is incorrect, subject to the time SAP requires to check the accuracy of the relevant Personal Data;
 - there is no legal basis for SAP to process your Personal Data and you demand SAP to restrict your Personal Data from further processing;
 - SAP no longer requires your Personal Data, but you state you require SAP to retain such data to claim or exercise legal rights or to defend against third party claims; or
 - in case you object to the processing of your Personal Data by SAP based on SAP's legitimate interest, subject to the time required for SAP to determine whether it has a prevailing interest or legal obligation in processing your Personal Data.
- To lodge a complaint to the competent supervisory authority if you are not satisfied with how SAP is processing your Personal Data. Your competent supervisory authority can be found in the country specific section.

Depending on applicable local data protection laws, your rights may be subject to deviations, limitations, or exceptions as set out in the country specific section "B. Additional Country and Regional Specific Provisions". Please be aware, that SAP honors your statutory rights when it comes to the Processing of your Personal Data to the extent provided by applicable data protection laws.

How to exercise your data protection rights

Please direct any requests to exercise your rights privacy@sap.com. SAP will take steps to ensure it verifies your identity to a reasonable degree of certainty before it will consider your data protection right request. When feasible, SAP will match Personal Data provided by you when submitting the 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, represented by third parties without duly representing respective authority or are otherwise not required by local law.

Can you use SAP's services if you are a minor?

In general, this website is 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 or use this SAP offering.

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.

1. 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 the Landesbeauftragter für den Datenschutz und die Informationsfreiheit Baden-Württemberg and can be reached at Lautenschlagerstraße 20, 70173 Stuttgart, Germany.

2. How does SAP justify international data transfers?

As a global group of companies, SAP has group affiliates and also uses third party service providers located in countries inside and outside of 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. 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: [privacy\[@\]sap.com](mailto:privacy[@]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 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 can be send via post to Avenida das Nações Unidas 14171 - Marble Tower – 7th Floor - São Paulo-SP, Brazil 04794-000 or email at privacy@sap.com.

If you want to learn more about the details of an international data transfer made by SAP, please visit International Data Transfers under the Brazilian Data Protection Law ("LGPD").

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 in Colombia.

Where SAP is subject to the requirements of the Colombian 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 privacy@sap.com. 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 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 privacy@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.

Where SAP is subject to privacy requirements in Indonesia.

Where SAP is subject to the requirements of the Personal Data Protection Law (PDPL) the following applies:

- PT. SAP Indonesia processes your Personal Data, either by itself or on behalf of the [SAP Group](#), with its main office located at WTC II, 9th Floor, Metropolitan Complex, Jl. Jend. Sudirman Kav. 29-31, Jakarta 12920, Indonesia.
- Your Personal Data may be stored and processed by the [SAP Group](#) in countries outside your jurisdiction for general business purposes. This will occur only when necessary or appropriate to achieve the purposes set out in this Privacy Statement.
- We implement reasonable technical and organizational measures to safeguard your Personal Data from misuse, interference, loss, unauthorized access, modification, or disclosure.

To the extent provided by applicable data protection laws, you have the right to:

- Access and obtain a copy of your Personal Data being processed, subject to the requirements of the law.
- Request the rectification or completion of inaccurate or incomplete Personal Data processed for specified purposes, as permitted by applicable law.
- Request for the deletion of your Personal Data, under certain lawful circumstances.
- Withdraw your consent for the processing of your Personal Data at any time. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

- Object to any decision-making process based solely on automated processing, including profiling, that produces legal effects concerning you or significantly impacts you.
- Object to or restrict the processing of your Personal Data where legitimate grounds exist, subject to applicable legal provisions.
- Lodge a complaint with the relevant data protection authority in Indonesia if you believe that your rights regarding the processing of your Personal Data have been infringed. You also have the right to claim damages if there are proven violations against regulations on the protection of your Personal Data, unless otherwise agreed upon or unless otherwise prescribed by law.
- Obtain a copy of your Personal Data in a structured, commonly used, and machine-readable format, as permitted by law.

To exercise your rights, including requesting access to and/or copies of your Personal Data, submitting objections, or seeking verification and correction of your Personal Data, please contact us via email at [privacy\[@\]sap.com](mailto:privacy[@]sap.com)

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:

- SAP Malaysia Sdn. Bhd. processes your Personal Data, either by itself or on behalf of the SAP Group, with its main office located at Level 29, Menara Southpoint, Mid Valley City, Medan Syed Putra Selatan, 59200 Kuala Lumpur, Malaysia.
- Inquiries, requests, or complaints regarding the processing of Personal Data may be directed to the local Data Protection Officer at dpo_sap.my@sap.com or by phone at +603 3003 5000. To exercise your data subject rights, including requesting access to and/or copies of your Personal Data, submitting objections, or seeking verification and correction of your Personal Data, please contact us via privacy@sap.com.
- As part of its global operations, SAP may transfer your Personal Data to its affiliates and trusted third-party service providers located outside Malaysia. In conducting Our international business operations, We may transfer your Personal Data to countries outside of Malaysia for the purposes described in this Privacy Statement. We conduct the international transfers in accordance with the local privacy laws and implement appropriate safeguards to ensure your Personal Data receives an adequate level of protection consistent with Malaysia’s PDPA.
- We implement reasonable technical and organizational measures to safeguard your Personal Data from misuse, interference, loss, unauthorized access, modification, or disclosure.

To the extent provided by applicable data protection laws, you have the right to:

- Access your Personal Data that we have on you, or have it updated.
- Object to the processing of Personal Data for direct marketing purposes.
- Object to the continued or intended processing of Personal Data, if such processing is likely to cause you or another person substantial and unwarranted damage or distress, subject to applicable legal requirements and exceptions.
- Data portability of the Personal Data you provided to SAP. In this case, please contact privacy@sap.com and specify the information or processing activities to which your request relates, the format in which you would like to receive the Personal Data, and whether it should be sent to you or another recipient. SAP will carefully consider your request and discuss with you how it can best be fulfilled, subject to requirements under the implementing guidelines issued by the data protection authority of Malaysia.
- 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 competent authority if you are not satisfied with how SAP is processing your Personal Data.

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 We have with you, e.g., at Our website.

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:

SAP is required to Process this Personal Data in accordance with applicable national or local law for which the collection of this information is authorised or required. The supply of this Personal Data by you is voluntary.

If the Personal Data is not collected, we may not be able to adequately provide the product or service you may request.

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 Nigeria.

Where SAP is subject to Nigeria's Data Protection Act (NDPA), the following applies:

Within Nigeria as a data subject, you have following rights:

- Right to be Informed;
- Right of Access;
- Right to Rectification;
- Right to Object to Processing;
- Right to Data Portability;
- Right to be Forgotten;
- Right in Relation to Automated Decision Making (which essentially entitles you to human intervention); and
- Right to lodge a complaint with the Nigeria Data Protection Commission (NDPC).

The contact details of your local Data Protection Officers in Nigeria are as follows: Mr. Femi Omotaiye and Mrs. Oluwaremilekun Adesina Address: Systems Applications Products Nigeria Limited, Mansard Place, 2nd Floor B Wing. Plot 927/928, Bishop Aboyade Cole Street. Victoria Island. Lagos, Nigeria Phone: +2342012776400 Email: privacy@sap.com

Where SAP is subject to privacy requirements in the Peru.

SAP has appointed a Data Protection Officer for Perú.

Written inquiries or complaints to our Data Protection Officer may be addressed to: Nicolás Skrandá Address: Av. Circunvalación del Club Golf Los Incas 154 – 16th Floor – Of. 1601 – Santiago de Surco, Lima, Perú - 15023 Email: [privacy\[@\]sap.com](mailto:privacy[@]sap.com)

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 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 [privacy\[@\]sap.ceom](mailto:privacy[@]sap.ceom) 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; telephone number: +632-8705-2500

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 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 can be send via post to Mapletree Business City, 30 Pasir Panjang Rd, #03-32, Singapore 117440 or email to privacy@sap.com with the subject “Data Protection Officer” or can be reached via phone +65 6664 6868.

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: [infoereg\[@\]justice.gov.za](mailto:infoereg[@]justice.gov.za).

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?

Please direct any enquiries or requests via email at privacy@sap.com or via phone at +82-2-2194-2279.

Where SAP is subject to privacy requirements in (the Kingdom of) Saudi Arabia (KSA).

Where SAP is subject to the requirements of the Personal Data Protection Law (PDPL) the following applies:

- SAP processes your Personal Data by using electronic means for collecting, storing and other processing as described above.
- SAP destroys your Personal Data by using electronic means as appropriate for the purposes described above.
- Your Personal Data will be held and stored by SAP or the SAP Group which may be located in another country outside of Saudi Arabia for our general business purposes including outsourcing and data processing.
- Depending on the purpose, Personal Data may be shared regularly or occasionally.
- Compensation can only be claimed if the courts determined that you were harmed by material or moral damage as a result of any violation stipulated in the PDPL and its Implementing Regulations.

If SAP does not comply with the PDPL you can file a complaint to the contact provided under section A of this document. If you are not satisfied with how we process your complaint you can file a complaint at the competent authority: Saudi Data and Artificial Intelligence Authority (SDAIA), Digital City, Riyadh, 12382, Kingdom of Saudi Arabia, Website: sdaia.gov.sa

Where SAP is subject to privacy requirements in Thailand.

Where SAP is subject to Thailand's Personal Data Protection Act ("PDPA"), the following applies:

- SAP Systems, Applications and Products in Data Processing (Thailand) Ltd. (referred to as "SAP Thailand") processes your Personal Data, either by itself or on behalf of the SAP Group, with its main office located at Units 1401-1402, 14th Floor, Park Silom Tower, 1 Convent Road, Silom, Bangrak, Bangkok 10500, Thailand.
- Inquiries, requests, or complaints regarding the processing of your Personal Data may be directed to the appointed Data Protection Officer for SAP Thailand at [privacy\[@\]sap.com](mailto:privacy[@]sap.com).
- As part of its global operations, SAP may transfer your Personal Data to its affiliates and trusted third-party service providers located outside Thailand. In conducting Our

international business operations, We may transfer your Personal Data to countries outside of Thailand for the purposes described in this Privacy Statement. We conduct the international transfers in accordance with the local privacy laws and implement appropriate safeguards to ensure your Personal Data receives an adequate level of protection consistent with Thailand's PDPA.

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.
- Appeal any denial of your request to exercise these rights.

How you can exercise your Data Protection Right.

To exercise these rights, either directly or via an appropriately appointed agent, or to limit the Sharing of your Personal Information, please contact us at at privacy@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).

New Jersey's Daniel's Law. SAP does not disclose on the Internet or otherwise make available information that is subject to a Daniel's Law request.

Children's Privacy. Given that no SAP offering is 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.

California Metrics. Metrics related to data subject requests received are available here:

<https://www.sap.com/about/legal/privacy/cpra-metrics.html>

Where SAP is subject to privacy requirements in Vietnam.

Where SAP is subject to Vietnam's Personal Data Protection Law ("PDPA") and its implementing decree ("Decree 356"), the following applies:

- SAP Vietnam Company Limited processes your Personal Data, either by itself or on behalf of the SAP Group, with its offices located at:
 - Room 1 and Room 2 of Floor 27, Floor 28, 29, 31, 32, Nexus Building, 3A3B, Ton Duc Thang Street, Sai Gon Ward, Ho Chi Minh City, Vietnam
 - 503-507, Level 5, Spaces Hanoi Belvedere Building, 28A Tran Hung Dao Street, Cua Nam Ward, Hanoi, Vietnam
- As part of its global operations, SAP may transfer your Personal Data to its affiliates and trusted third-party service providers located outside Vietnam. Such transfers may be necessary for the purposes described in this Privacy Statement, including the provision of Our products and services and the operation of Our internal business processes. Where required under Vietnam's PDPL, SAP implements appropriate legal and technical measures to protect Personal Data during cross -border transfers and ensures that such transfers are conducted in accordance with applicable local privacy requirements.
- SAP implements reasonable technical and organizational safeguards intended to help protect the fundamental rights of everyone whose Personal Data is processed by SAP, whether they are customers, suppliers, partners, prospects, employees, or applicants. As with all data processing activities, there exists the possibility of associated risks including but not limited to accidental or unlawful destruction, loss, alteration, or unauthorized disclosure. By using Our services, you acknowledge and accept the possible inherent risks associated with such processing.

To the extent provided by applicable data protection laws, you have the right to:

- Access your Personal Data that we have on you, or have it updated;

- Request the rectification or completion of inaccurate or incomplete Personal Data processed for specified purposes, as permitted by applicable law;
- Request the provision, deletion, or restriction of the processing of your Personal Data and to object to SAP's further processing of such data, subject to applicable law. SAP will assess and respond to these requests in accordance with legal requirements. Please note that SAP can delete or restrict the processing of your Personal Data only where no statutory obligation, regulatory requirement, or prevailing right of SAP exists to retain or continue processing it. If you request deletion, you may no longer be able to use SAP services that rely on the relevant data. Where you submit an objection, SAP will carefully review it and stop processing the affected Personal Data when required by law, unless SAP needs the data to handle legal claims or has other lawful grounds to continue;
- 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). Where 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 with the appropriate regulatory authority and/or seek compensation for damages, where permitted under applicable data protection laws, and subject to the requirements, limitations, and procedures prescribed by such laws; and
- Request the implementation of appropriate measures to protect the Personal Data We process about you, in accordance with applicable laws and regulations.

To exercise your rights, including requesting access to and/or copies of your Personal Data, submitting objections, or seeking correction of your Personal Data, please contact us via email at [privacy\[@\]sap.com](mailto:privacy[@]sap.com).