

SAP Privacy Statement for SAP User Research Panel ("This Panel")

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A. GENERAL INFORMATION

Protecting the individual's privacy is crucial to the future of business. We have created this Privacy Statement to demonstrate the firm commitment of SAP (hereinafter "We", "SAP", "Us" or "Our") to the individual's right to data protection and privacy. It outlines how We handle information that can be used to directly or indirectly identify an individual (hereinafter "Personal Data").

I. Who do We mean when We say SAP in this Privacy Statement

The data controller for This Panel is SAP SE, Dietmar-Hopp-Allee 16, 69190 Walldorf, Germany and any of its affiliates, that want to conduct user research activities (together "SAP"). You can reach SAP Group's data protection officer any time at [privacy@\[sap\].com](mailto:privacy@[sap].com).

II. For what purposes does SAP process your Personal Data?

To invite you to user research activities

We desire to keep Our customers and partners satisfied with Our products and services and therefore ask them on a regular basis for their feedback. We collect your data, to be able to invite you to user research activities which are of interest to you. Providing your data and participating in user research activities is voluntary.

III. What categories of Personal Data does SAP process?

Data you enter when you sign-up to This Panel or answer study specific screener questions, when being invited to research activities. This may include:

- Contact Data, such as first name, last name, email address.
- Personal Data related to the business relationship with SAP, such as company name, company size, industry, job title and role, job experience, SAP software products in use, experience with Our products
- Demographic data (such as age, gender, location, language)
- Personal Data received by third parties, including publicly available sources:
SAP generally aims to collect Personal Data directly from the data subjects. If you or applicable law allows SAP to do so, SAP may obtain Personal Data also from third party sources. These third-party sources may include:
 - your employer in the context of its business dealings with SAP and/or the [SAP Group](#),

- third parties you directed to share your Personal Data with SAP,
- third party sources and publicly available sources like business oriented social networks or information broker.

When We collect Personal Data from third party sources, 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, plus any additional restrictions imposed by the third party that provided the Personal Data to SAP or by applicable national law.

IV. From What Types of Third Parties does SAP obtain Personal Data?

In most cases, SAP collects Personal Data from you. SAP might also obtain Personal Data from a third party if the applicable national law allows SAP to do so. SAP will treat this Personal Data according to this Privacy Statement, plus any additional restrictions imposed by the third party that provided SAP with it or the applicable national law.

These third-party sources may include:

- SAP and/or SAP Group's business dealings with your employer
- Third parties you directed to share your Personal Data with SAP
- Third party sources and publicly available sources like business oriented social networks or information broker

V. How long does SAP store your Personal Data

SAP will store your Personal Data as long as We conduct user research activities, or until you ask SAP to delete it. However, if you do not apply to any study you are invited to, We'll confirm with you latest after 3 years of inactivity, if We should keep your data in This Panel or if you would like to have your data deleted.

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. SAP will retain your Personal Data until the end of the relevant retention period or until the claims in question have been settled.

VI. Who are the recipients of your Personal Data?

Your Personal Data will be passed on to the following categories of third parties to process your Personal Data:

- companies within the SAP Group: If you would like to find out which SAP group entity is responsible for the user research activities with you, please contact Us at [userresearch_panel_privacy\[@\]sap.com](mailto:userresearch_panel_privacy[@]sap.com).
- third party service providers: Your personal data will be processed on servers of the Panel platform provider UserInterviews, Inc, a United States (Delaware) corporation, having a place of business at 228 Park Ave S, PMB 38712, New York, NY 10003.

VII. What are your data protection rights?

Right to access, correct and delete

You can request from SAP at any time access to information about which Personal Data SAP processes about you and, if necessary, 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. 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.

Right to obtain a copy of Personal Data

You can further request from SAP a copy of the Personal Data you provided to SAP. In this case, please contact [userresearch_panel_privacy\[@\]sap.com](mailto:userresearch_panel_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.

Right to restrict

You can request from SAP to restrict your Personal Data from further processing in any of the following events:

- 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.

Right to lodge a complaint

If you take the view that SAP is not processing your Personal Data in accordance with the requirements in this Privacy Statement or under applicable data protection laws, you can at any time, to the extent required by applicable law, lodge a complaint with your locally relevant data protection authority, specifically when you are located in an EEA country, or with the data protection authority of the country or state where SAP has its registered seat.

VIII. How can you exercise your data protection rights?

Please direct any requests to exercise your rights to [userresearch_panel_privacy\[@\]sap.com](mailto:userresearch_panel_privacy[@]sap.com).

IX. How will SAP verify requests to exercise data protection rights?

SAP will take steps to ensure it verifies your identity to a reasonable degree of certainty before it will process the data protection right you want to exercise. When feasible, SAP will match Personal Data provided by you in submitting a request to exercise your rights with information already maintained by SAP. This could include matching two or more data points you provide when you submit a request with two or more data points that are already maintained by SAP. SAP will decline to process requests that are manifestly unfounded, excessive, fraudulent, represented by third parties without duly representing respective authority or are otherwise not required by local law.

B. ADDITIONAL COUNTRY AND REGIONAL SPECIFIC PROVISIONS

I. Where SAP is subject to privacy requirements in the EU/EEA or a country with national laws equivalent to the GDPR

Who is the relevant Data Protection authority?

You may find the contact details of your competent data protection supervisory authority [here](#). SAP's lead data protection supervisory authority is in Germany, the Landesbeauftragter für den Datenschutz und die Informationsfreiheit Baden-Württemberg and can be reached at Lautenschlagerstraße 20, 70173 Stuttgart.

What are the legal permissions for SAP to process Personal Data?

SAP is processing your Personal Data collected for This Panel and included in answers to any screener questions, in order to enable you to provide feedback to SAP services and products (Article 6 para. 1 lit. b GDPR).

How does SAP justify international data transfers?

As a global group of companies, SAP has group affiliates and uses third party service providers also in countries outside the European Economic Area (the "EEA"). SAP may transfer your Personal Data to countries outside the EEA as part of SAP's international business operations. If We transfer Personal Data from a country in the EU or the EEA to a country outside the EEA and for which the EU Commission has not issued an adequacy decision, SAP uses the EU standard contractual clauses to contractually require the data importer to ensure a level of data protection consistent with the one in the EEA to protect your Personal Data. You may obtain a copy (redacted to remove commercial or irrelevant information) of such standard contractual clauses by sending a request to [privacy\[@\]sap.com](mailto:privacy[@]sap.com). You may also obtain more information from the European Commission on the international dimension of data protection [here](#).

II. Where SAP is subject to privacy requirements in Colombia.

[Colombia-Specific Provisions](#) apply to citizens of the Republic of Colombia.

III. Where SAP is subject to the requirements of the Brazilian General Data Protection Law ("LGPD")

SAP has appointed a Data Protection Officer for Brazil. Written inquiries, requests or complaints to our Data Protection Officer may be addressed to:

Paulo Nittolo Costa

Email: [privacy\[@\]sap.com](mailto:privacy[@]sap.com)

Address: Avenida das Nações Unidas 14171 - Marble Tower – 7th Floor - São Paulo-SP, Brazil 04794-000

IV. Where SAP is subject to privacy requirements in the Philippines.

For individuals within the Philippines, you may exercise your rights as follows:

You can call or write to SAP to submit a request at:

Phone: +632-8705-2500

Address: SAP Philippines, Inc.

Attn: Data Protection Officer

27F Nac Tower, Taguig City 1632, Philippines

The following provisions apply to residents and citizens of the Philippines:

- You may claim compensation as finally awarded by the National Privacy Commission or the courts if you suffered damages due to inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of Personal Data, considering any violation of your rights and freedoms.
- If you are the subject of a privacy violation or Personal Data breach, or are otherwise personally affected by a violation of the Data Privacy Act, you may file a complaint with the National Privacy Commission.
- **Your Transmissibility Rights.** Your lawful heirs and assigns may invoke your rights at any time after your death or when you are incapacitated or incapable of exercising your rights.

V. Where SAP is subject to privacy requirements in the United States of America.

U.S. Children’s Privacy. SAP does not knowingly collect the Personal Data of children under the age of 13. If you are a parent or guardian and believe SAP collected information about a child, please contact SAP as described in this Privacy Statement. SAP will take steps to delete the information as soon as possible. Given that This Panel is not directed to users under 16 years of age and in accordance with the disclosure requirements of the CCPA, SAP does not sell the Personal Data of any minors under 16 years of age.

VI. Where SAP is subject to privacy requirements in the State of California, USA.

You have the right:

- to request from SAP access to your Personal Data that SAP collects, uses, or discloses about you;
- to request that SAP delete Personal Data about you;
- to opt-out of the use or disclosure of your sensitive personal information;
- to non-discriminatory treatment for exercise of any of your data protection rights; and
- if you request access to your Personal Data, for such information to be portable, if possible, in a readily usable format that allows you to transmit this information to another recipient without hindrance.

In accordance with the disclosure requirements under the California Consumer Privacy Act (“CCPA”), SAP does not sell or share your Personal Data. In the course of our business activities We may share Personal Data with third parties, or permit third parties to collect data across various SAP websites.

Data Subject Access Requests:

SAP receives Data Subject Access Requests from across the globe and works to ensure all valid requests where SAP is the Controller are responded to within the appropriate timeframe. In accordance with the verification process set forth in the CCPA, SAP will 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.

In addition to contacting SAP at [userresearch_panel_privacy\[@\]sap.com](mailto:userresearch_panel_privacy[@]sap.com), you may also exercise your rights as follows:

You can call toll-free to submit a request using the numbers provided [here](#). You can also designate an authorized agent to submit requests to exercise your data protection rights to SAP. Such authorized agent must be registered with the California Secretary of State and submit proof that you have given authorization for the agent to act on your behalf.”

VII. Where SAP is subject to privacy requirements in Singapore.

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

SAP has appointed a Data Protection Officer for Singapore. Written inquiries, requests or complaints to our Data Protection Officer may be addressed to:

Subject: Data Protection Officer

Address: Mapletree Business City, 30 Pasir Panjang Rd, Singapore 117440

Contact: +65 6664 6868