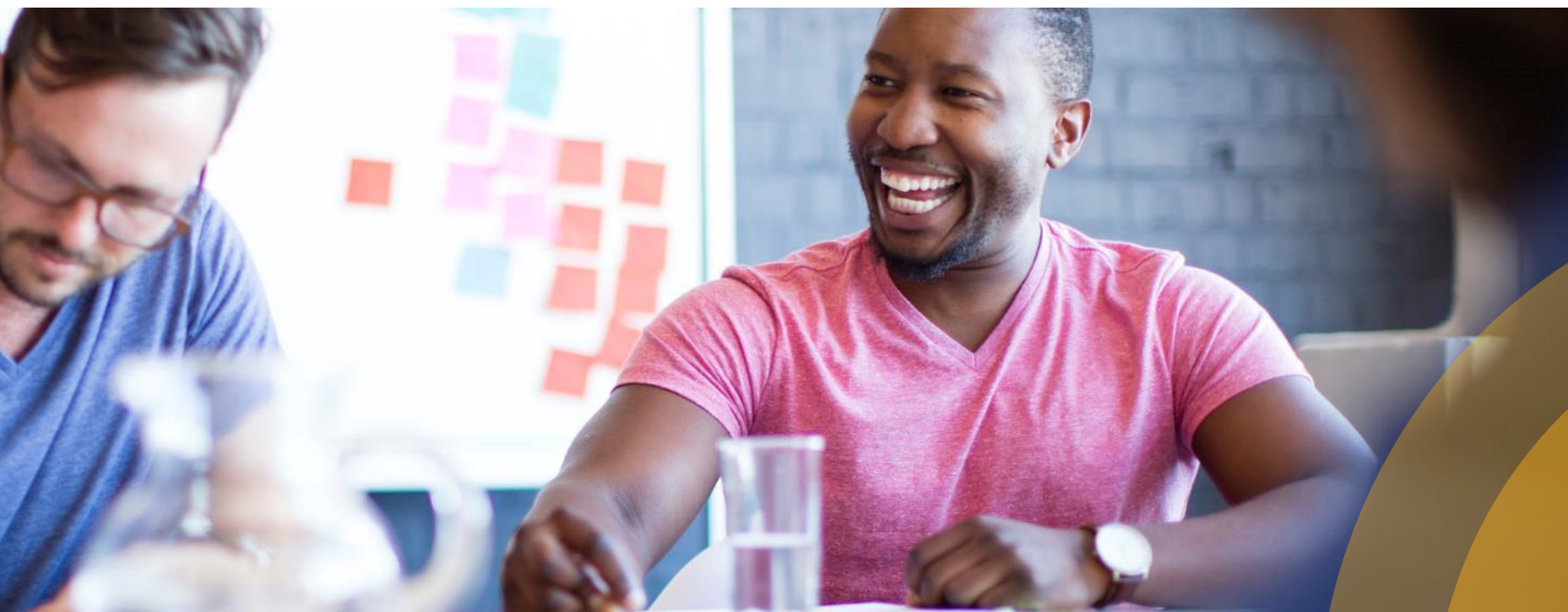




SAP SuccessFactors

The New Age of Data Protection: How It Impacts You -- and How SAP Helps

PUBLIC

Barbara O'Cain, J.D.
SAP SuccessFactors
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Legal Disclaimer

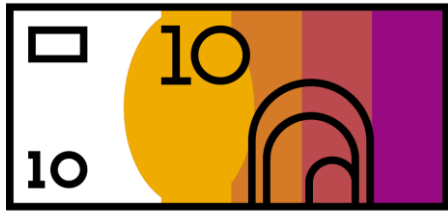
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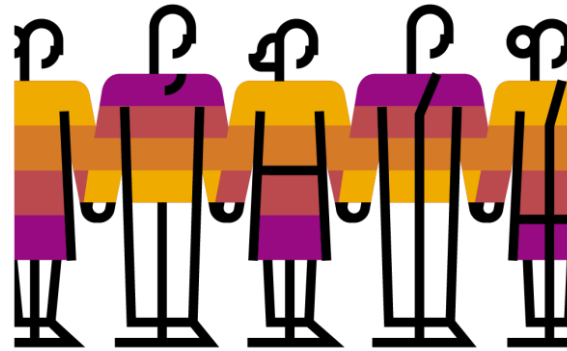
It is the customer's responsibility to adopt measures that the customer deems appropriate to achieve compliance.

Security is more important than ever for business



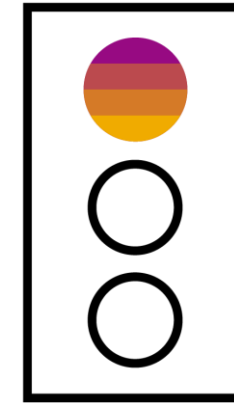
\$600 billion

lost to cybercrime each year ¹



3.6 million

unfilled cybersecurity jobs by
2022²



85%

of consumers will not do
business with a company if they
have concerns about its security
practices³

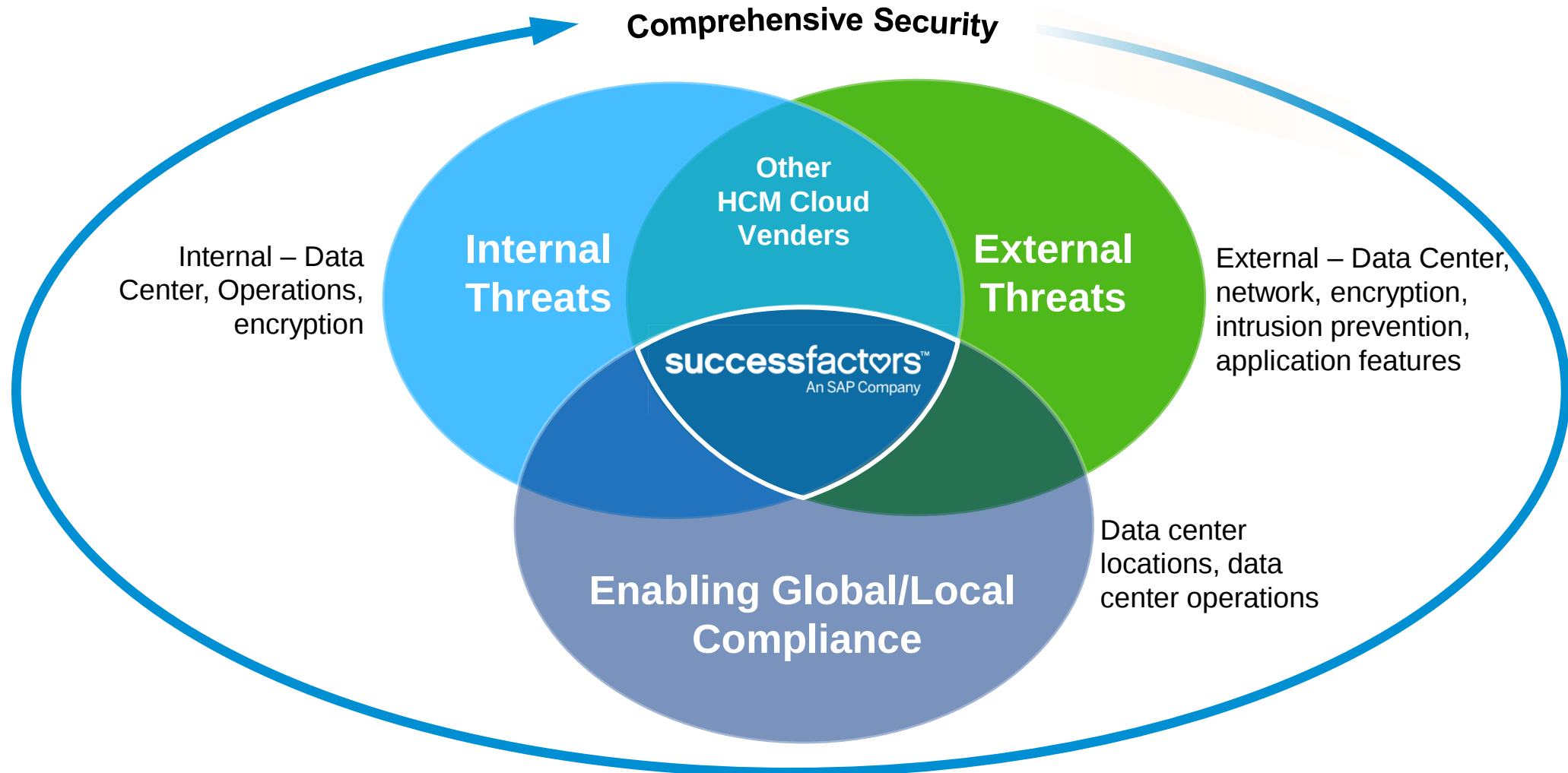
1: Economic Impact of Cybercrime— No Slowing Down, McAfee 2021, 2: Cybersecurity Ventures report 2021, 3: PwC US Protect.me Survey 2021

Cost of Non-Compliance : reputational, legal, financial,...



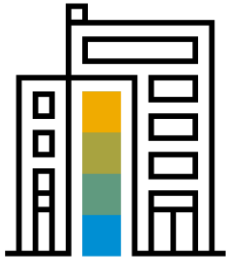
85 % of consumers will not do business with a company if they have concerns about its security practices¹

Considerations when choosing an HCM cloud vendor



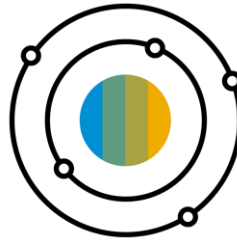
Unparalleled Data Protection with SAP SuccessFactors

Defense-in-Depth approach provides multilayered defense at all touchpoints in the information flow



Physical

- 14 global data centers in 8 countries and 5 continents to support data residency and redundancy needs
- Bulletproof walls; closed-circuit cameras; card-key, biometric, and ID-badge systems
- ANSI/TIAEIA-942 Tier III + facilities



Network

- Perimeter protection firewalls
- Intrusion detection
- Regularly scheduled infrastructure scans



Application

- Multitenant architecture
- Role-based permissions
- Single sign-on
- Activity monitoring
- Multiple encryptions

Data Protection and Privacy

Data privacy is more than just the General Data Protection Regulation (GDPR)

- Continued explosion of data protection and privacy regulations across the globe
- Multitude of features and solutions built by SAP SuccessFactors
- 2000+ security, compliance & localization experts on staff



Australia

National Privacy Principals,
State Privacy Bills, E-mail
Spam and Privacy Bills



Chile

Law for the Protection of
Private Life



India

IT Rules (2011);
Pending laws
under discussion



Russia

Russia Data Privacy regulations
Cryptographic enforcements



USA federal

Privacy Shield, US Patriotic Act,
Others Federal and State Laws



Brazil

Article 5 of Constitution



Colombia

Data Privacy Law 1266



Mexico

Personal Data
Protection Law



South Africa

Electronic Communications
and Transactions Act



Canada

PIPEDA, FOIPPA, PIPA



European Union

EU Data Protection Directive
General Data Protection Regulations



New Zealand

Privacy Act



United Kingdom

ICO Privacy and Electronic
Communications Regulations



CALIFORNIA REPUBLIC

Over 100 different jurisdictions with 450+ data privacy laws and counting.

GDPR

Protects fundamental rights related to the processing of personal data

Individual rights

...to be informed

...of access

...to rectification

...to erasure (to
be forgotten)

...to restrict
processing

...to data portability

...to object

auto. decisions
and profiling

Lawful processing always requires legal permission

Consent

Contract

Legal
obligation

Vital
interest

Public
interest

Legitimate
interest

Personal data
Sensitive personal data

Secure Your Organization

Right Laws

- ❑ Do not assume immunity
- ❑ Location not determining factor
- ❑ Specialized counsel
- ❑ Multi-team environment
- ❑ Will need audit or review

Right Mindset

- ❑ DP by design
- ❑ Clear leadership understanding & commitment
- ❑ Good for business
- ❑ Better data = insight & productivity
- ❑ Communication & training to all

Right Org Structure

- ❑ DP is everyone's duty
- ❑ Data Protection Officer
- ❑ Clear lines of reporting & responsibility
- ❑ Capable staff must know where data housed, map flow in & out of organization

Right Tools

- ❑ Technology can assure compliance, efficiency & ease
- ❑ HCM must search, store, audit, process, track and manage data
- ❑ HCM must integrate with all HR solutions
- ❑ HCM must be localized in all countries or regions & must update laws

How SAP SuccessFactors **helps**



Data protection and privacy features in SAP SuccessFactors solutions

Features built into SAP SuccessFactors products

Data purge:

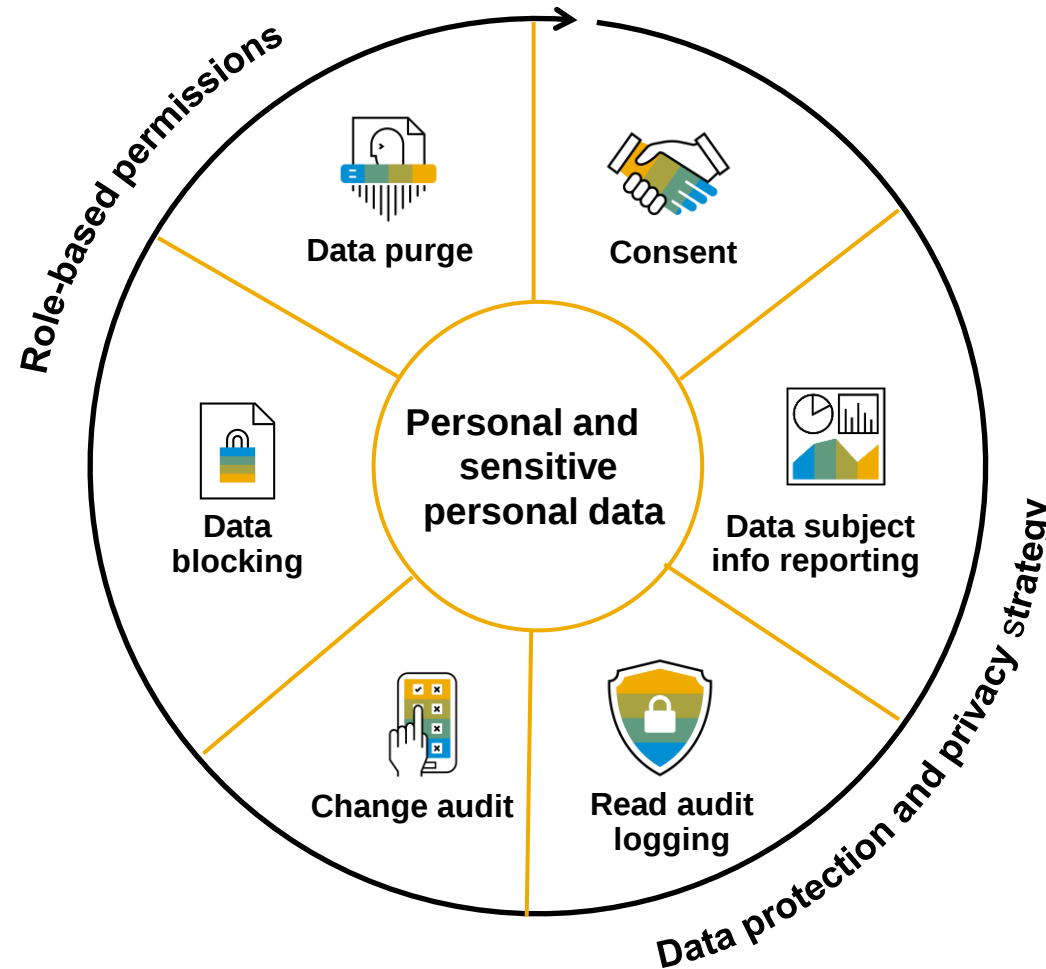
Configure data retention rules, and permanently delete personal data from SAP SuccessFactors solutions

Data blocking:

Limit access to historical data within SAP SuccessFactors Employee Central

Change audit:

Manage, record, and report on personal data changes across most SAP SuccessFactors solutions



Consent

Configure and manage consent statements as well as their acceptance where needed

Data subject info reporting

Generate a data subject report containing all the data subject's personal data available in SAP SuccessFactors solutions

Read audit logging

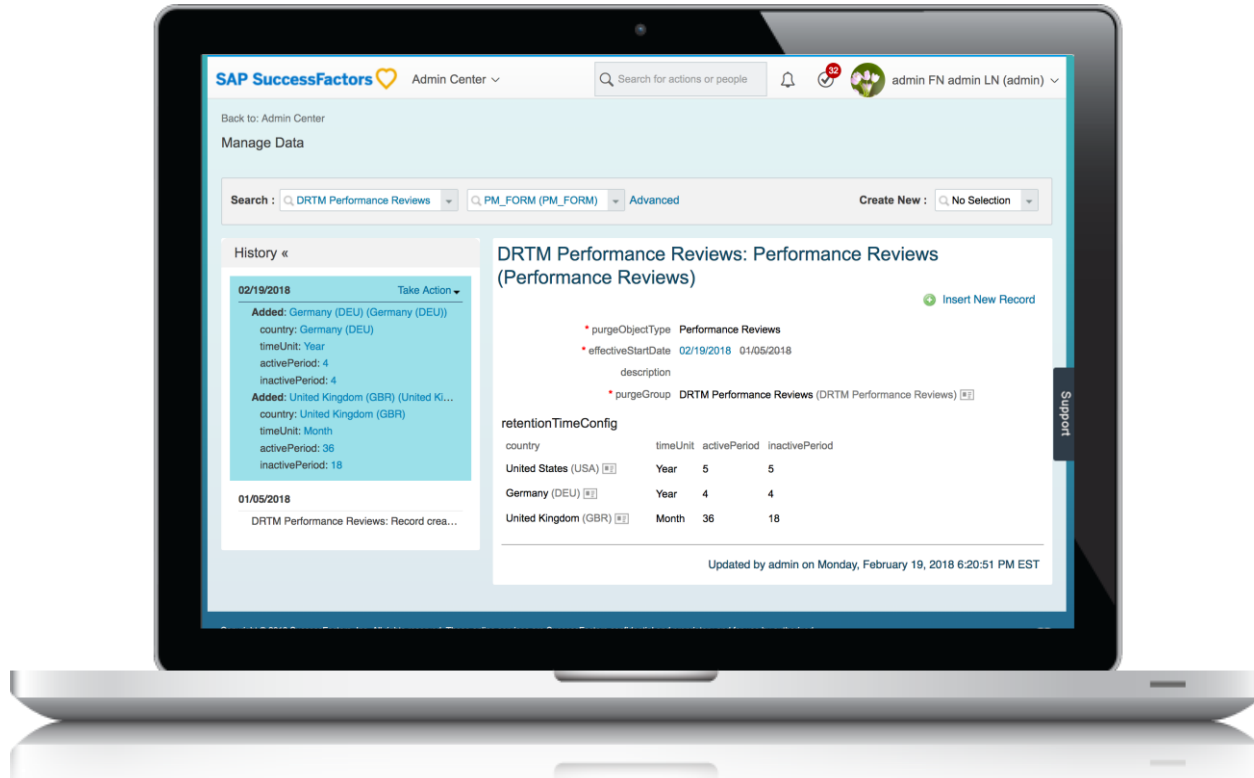
Allows customers to log read access to sensitive data fields

Data Purge



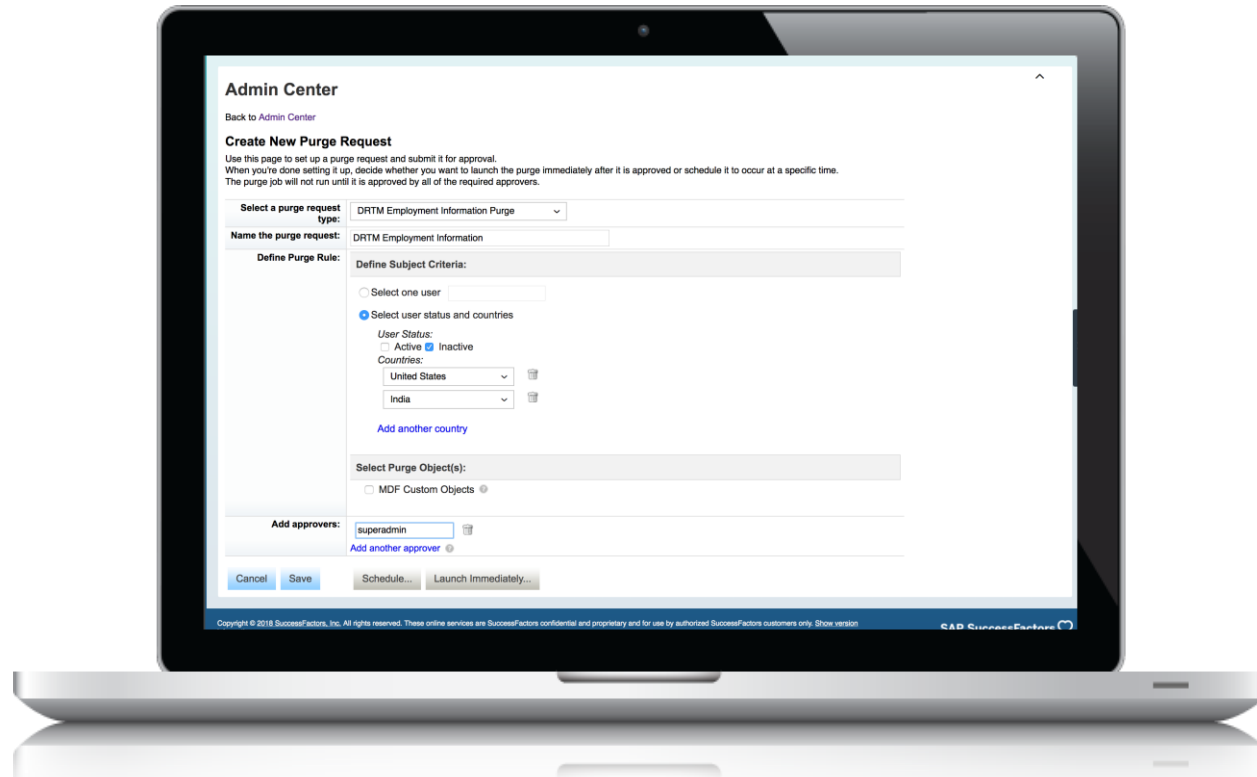
Data Purge

Configure Country-Specific Retention Times



- Supports good business practices of removing personal data when it is no longer needed
- Allows you to define country-specific retention times that provide the boundaries for data purges
- Note that when you purge data you permanently delete the data and it cannot be retrieved later.

Create and Schedule Data Purge Request



- Restrict access to who can create and approve purge requests
- Schedule report or launch immediately following approval
- Approvers receive a preview report to help determine whether to approve or decline the request
- When the purge job completes, requestors and approvers can use the final purge report to confirm the successful purge of each record

Data Blocking

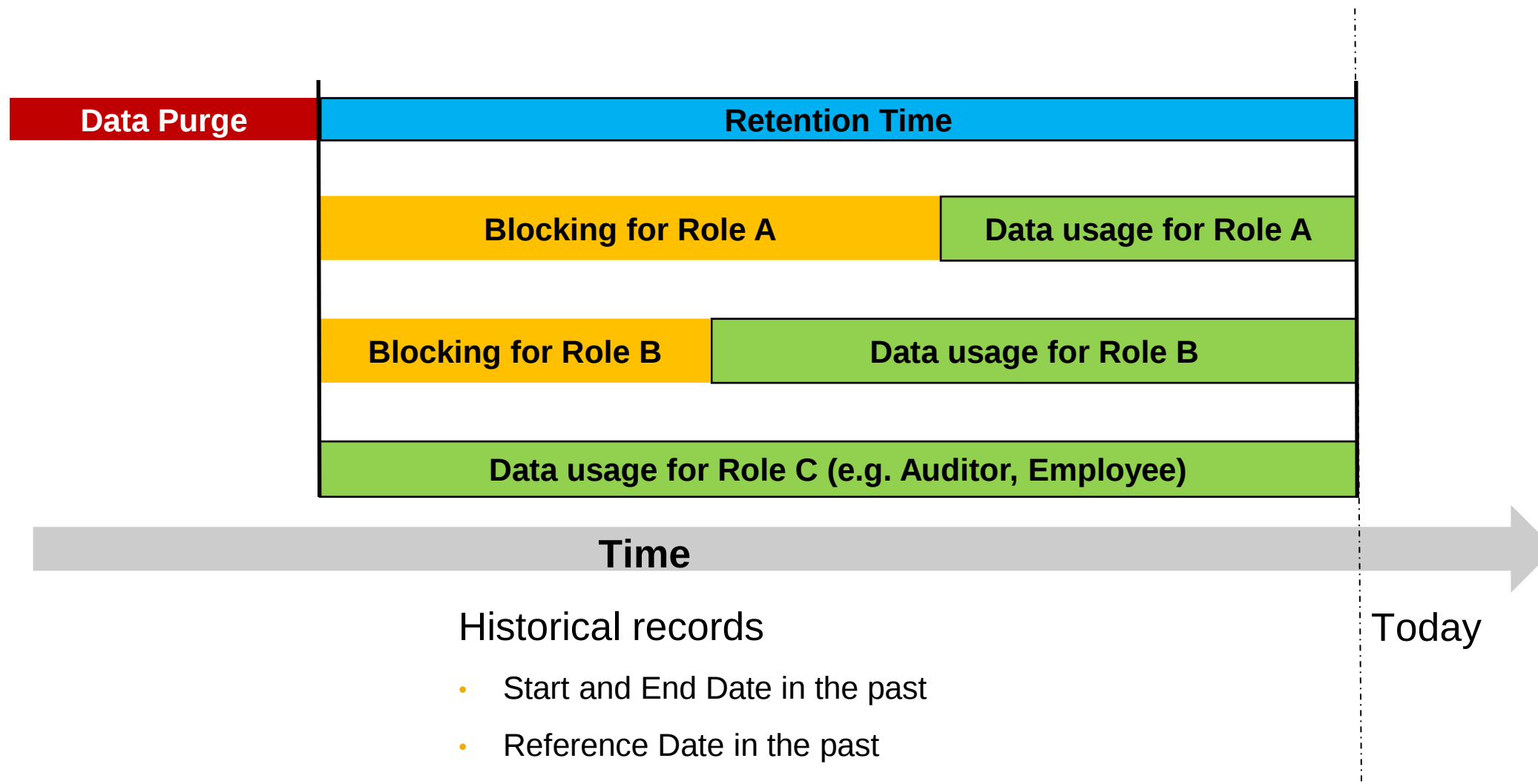


Data Blocking

- Data privacy best practice is to limit access to personal data to those who need to see it. Different roles may have a different need-to-know requirement
- Data blocking allows you to restrict access to historical, personal data that is within a retention period and therefore still in the system
- You can grant one role access to the data, while blocking access for another role
- Data Blocking is supported in Employee Central and Reporting. In other modules, all roles need access to all historical data



Data Blocking – Concepts



Example of Data Blocking in Use

- Without an access period defined for data blocking, the first role can access all historical Dependents records.
- With an access period defined for 3 months, the second role can only see the current Dependents record.

The image displays two screenshots of the SAP SAPGUI interface, illustrating data blocking in use. Both screenshots show the 'Change History' and 'Dependents Changes' tabs for a dependent record.

Screenshot 1 (Top): This screenshot shows the 'Change History' tab with a list of historical records. The first record, dated 'Nov 1, 2017', is highlighted with a yellow circle labeled '1'. The 'Dependents Changes' tab shows the details for this record, including the dependent's name (Rob Aberts), relationship (Divorced Spouse), and date of birth (May 18, 1988). The 'Change History' tab also shows a second record dated 'Jan 1, 2017', which is also highlighted with a yellow circle labeled '1'. The 'Dependents Changes' tab shows the details for this record, including the dependent's name (Rob Aberts), relationship (Divorced Spouse), and date of birth (May 18, 1988).

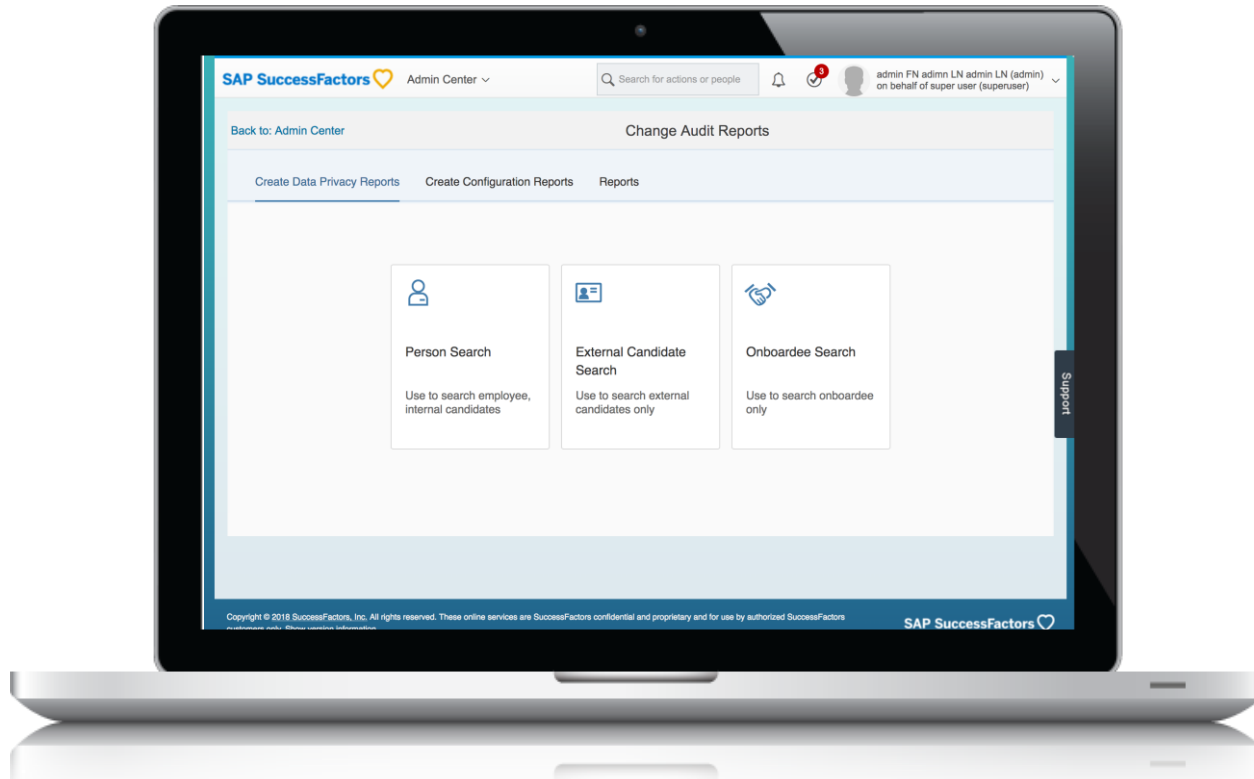
Screenshot 2 (Bottom): This screenshot shows the 'Change History' tab with a list of historical records. The first record, dated 'Nov 1, 2017', is highlighted with a yellow circle labeled '2'. The 'Dependents Changes' tab shows the details for this record, including the dependent's name (Rob Aberts), relationship (Divorced Spouse), and date of birth (May 18, 1988). The 'Change History' tab also shows a second record dated 'Jan 1, 2017', which is also highlighted with a yellow circle labeled '2'. The 'Dependents Changes' tab shows the details for this record, including the dependent's name (Rob Aberts), relationship (Divorced Spouse), and date of birth (May 18, 1988).

Change Audit

A vibrant, stylized line-art illustration of a city scene. In the center, a large heart is formed by concentric rings of yellow and orange. The city is depicted with various elements: buildings of different heights and colors (yellow, orange, green, blue), trees, people sitting on benches, people riding bicycles, a car, and an airplane flying in the sky. The overall style is clean and modern, with a focus on community and urban life.

Create Change Audit Report

Report on personal data changes across SuccessFactors applications



Create Data Privacy Reports

Activity:

☒ Change On Subject User

☐ Change By User

Person:

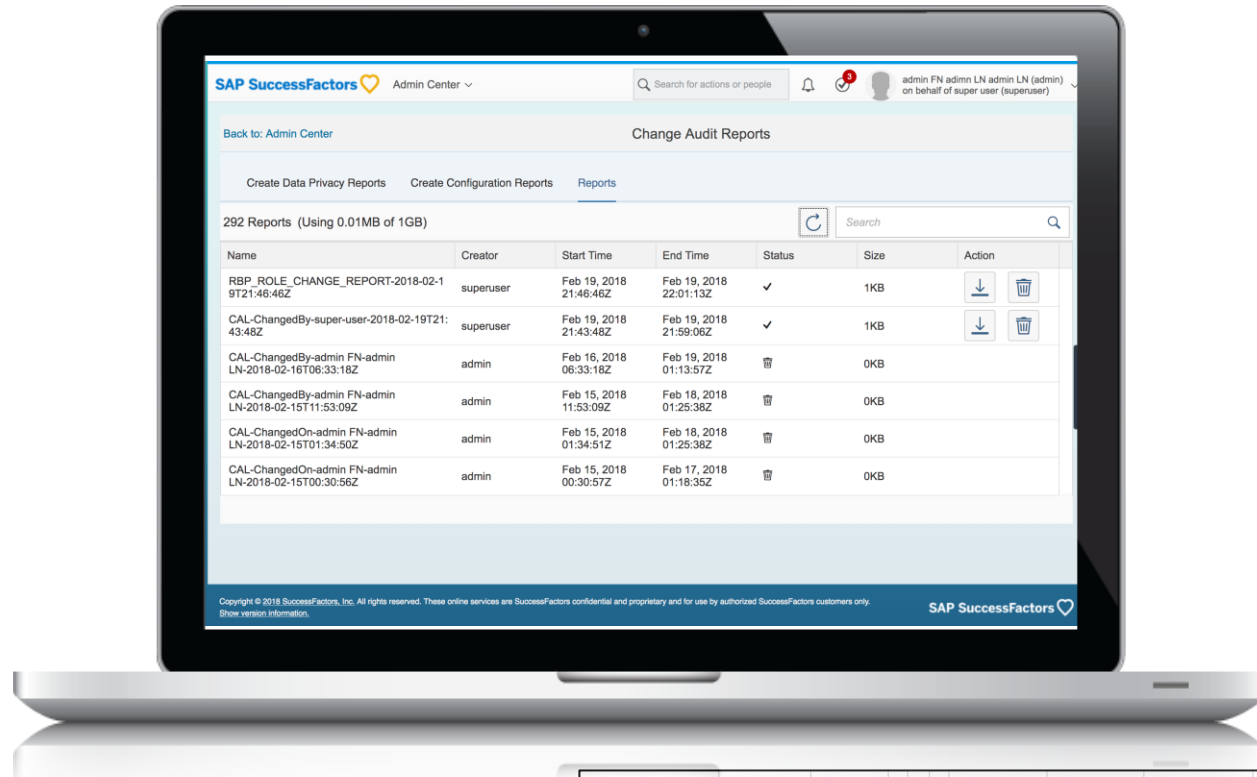
Modules:

Functional Areas:

Time Range:

Manage and Download Change Audit Reports

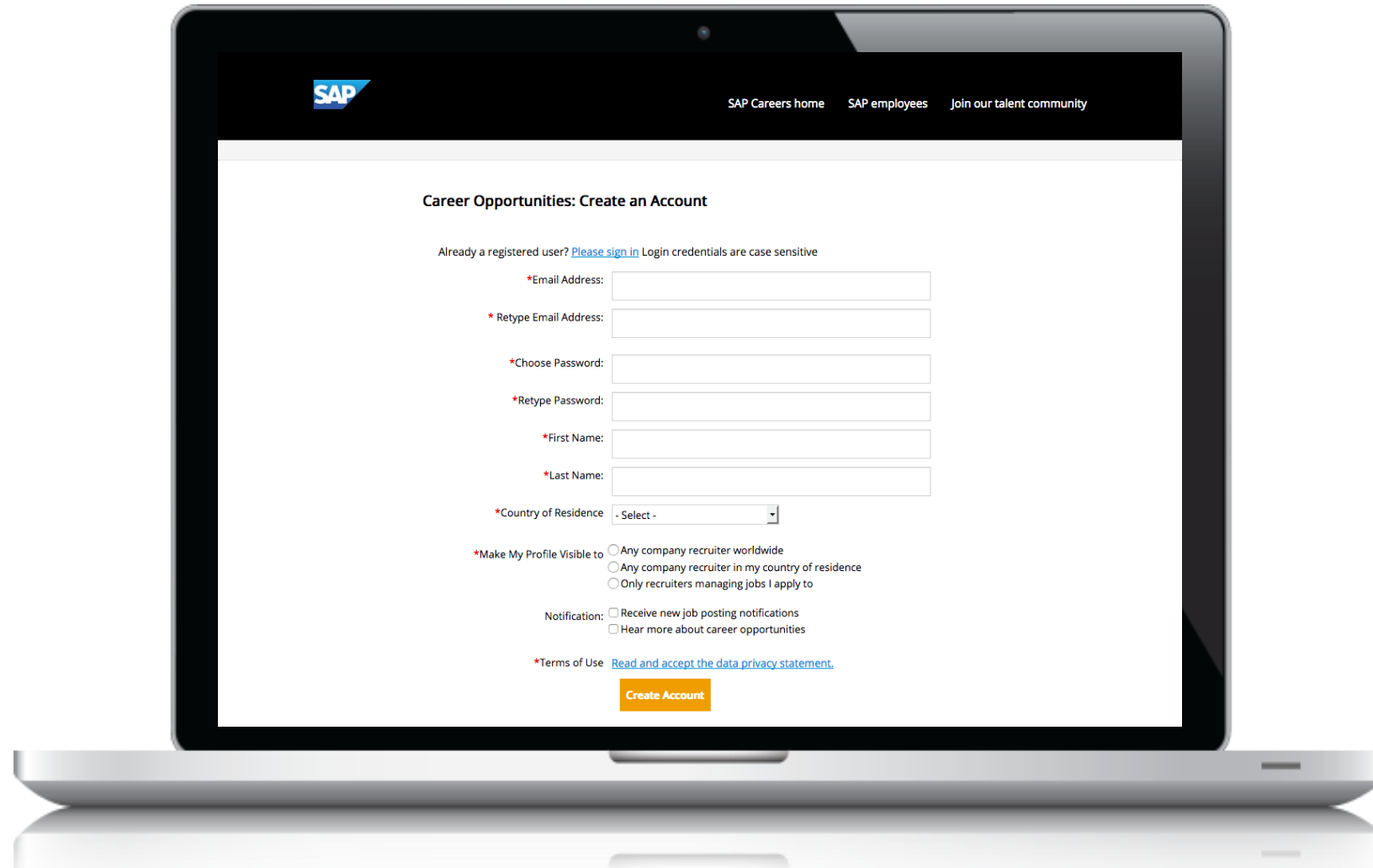
Check report availability and download



Changed By User (I	Changed By	Changed E	Pr	Pr	Subject User	Subject User	Subject User (I	Module	Functiona	Field Name	Old Value	New Value	Operation	Timestamp	Effective	Effective Sequence
admin FN	admin LN	admin			admin FN	admin LN	admin	Employee	Custom Back	Documents/Document Name		test1	I	2018-02-13T09:52:26		0
admin FN	admin LN	admin			admin FN	admin LN	admin	Employee	Custom Back	Documents/Attachment		10861	I	2018-02-13T09:52:26		0
admin FN	admin LN	admin			admin FN	admin LN	admin	Employee	Custom Back	Documents/Document Name		test1	I	2018-02-13T09:52:27		0
admin FN	admin LN	admin			admin FN	admin LN	admin	Employee	Custom Back	Documents/Attachment		10862	I	2018-02-13T09:52:27		0
admin FN	admin LN	admin			admin FN	admin LN	admin	Employee	Custom Back	Documents/Document Name		test1	I	2018-02-13T09:52:27		0
admin FN	admin LN	admin			admin FN	admin LN	admin	Employee	Custom Back	Documents/Attachment		10863	I	2018-02-13T09:52:27		0
admin FN	admin LN	admin			admin FN	admin LN	admin	Employee	Custom Back	Documents/Document Name		test1	I	2018-02-13T09:52:27		0
admin FN	admin LN	admin			admin FN	admin LN	admin	Employee	Custom Back	Documents/Attachment		10864	I	2018-02-13T09:52:27		0
admin FN	admin LN	admin			admin FN	admin LN	admin	Employee	Custom Back	Documents/Document Name		test1	I	2018-02-13T09:52:27		0
admin FN	admin LN	admin			admin FN	admin LN	admin	Employee	Custom Back	Documents/Attachment		10865	I	2018-02-13T09:52:27		0
admin FN	admin LN	admin			admin FN	admin LN	admin	Employee	Custom Back	Documents/Document Name		test1	I	2018-02-13T09:52:27		0

Consent

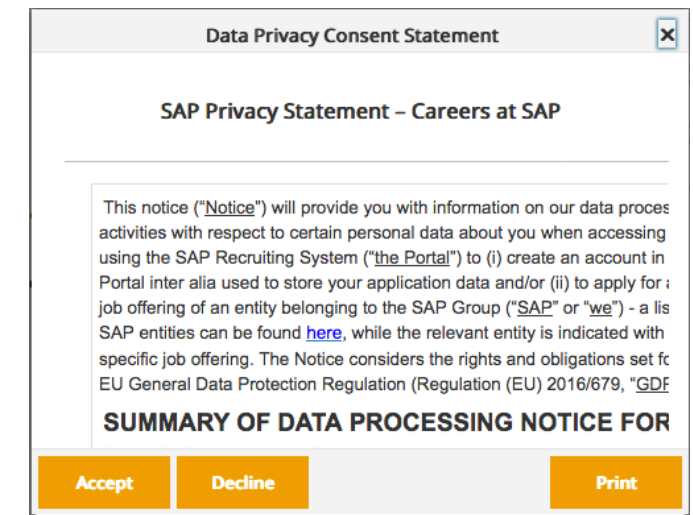
Manage consent as grounds for legal processing



The screenshot shows a laptop displaying the SAP Careers 'Create an Account' page. The page has a dark header with the SAP logo and navigation links: 'SAP Careers home', 'SAP employees', and 'Join our talent community'. The main content area is titled 'Career Opportunities: Create an Account'. It includes a link for existing users to 'Please sign in'. The form fields are as follows:

- *Email Address: [text input]
- * Retype Email Address: [text input]
- *Choose Password: [text input]
- *Retype Password: [text input]
- *First Name: [text input]
- *Last Name: [text input]
- *Country of Residence: [- Select -]
- *Make My Profile Visible to:
 - ☐ Any company recruiter worldwide
 - ☐ Any company recruiter in my country of residence
 - ☐ Only recruiters managing jobs I apply to
- Notification:
 - ☐ Receive new job posting notifications
 - ☐ Hear more about career opportunities
- *Terms of Use: [Read and accept the data privacy statement.](#)

At the bottom of the form is a yellow 'Create Account' button.



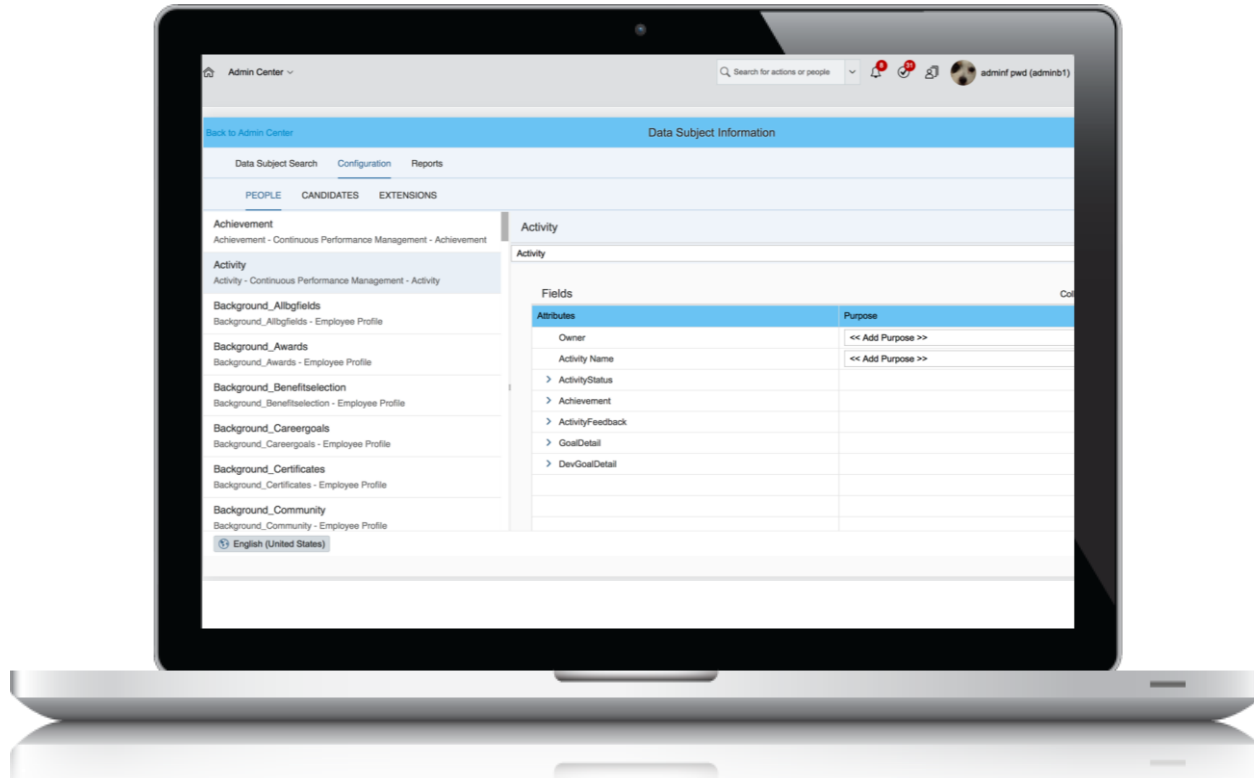
The screenshot shows a 'Data Privacy Consent Statement' dialog box. The title bar says 'Data Privacy Consent Statement' with a close button. The main heading is 'SAP Privacy Statement – Careers at SAP'. The text inside reads:

This notice ("Notice") will provide you with information on our data processing activities with respect to certain personal data about you when accessing using the SAP Recruiting System ("the Portal") to (i) create an account in Portal inter alia used to store your application data and/or (ii) to apply for a job offering of an entity belonging to the SAP Group ("SAP" or "we") - a list of SAP entities can be found [here](#), while the relevant entity is indicated with specific job offering. The Notice considers the rights and obligations set forth in the EU General Data Protection Regulation (Regulation (EU) 2016/679, "GDPR").

Below the text is the heading 'SUMMARY OF DATA PROCESSING NOTICE FOR'. At the bottom are three buttons: 'Accept', 'Decline', and 'Print'.

Configure Data Subject Info Report

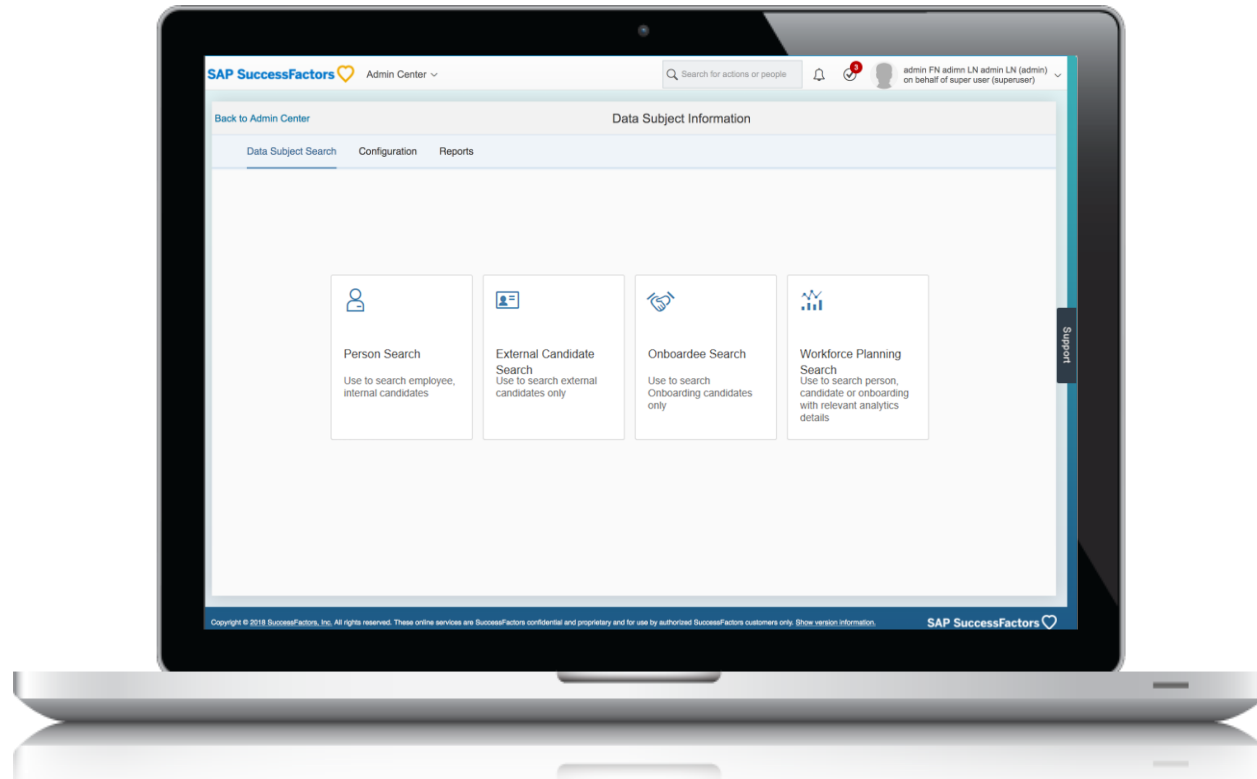
Report on a data subject's personal data across SuccessFactors applications



- One stop shop to specify which data elements you want to include in the report from each area of SAP SuccessFactors
- Configure data purpose to be included for additional context in the report output

Create Data Subject Info Report

Report on a data subject's personal data across SuccessFactors applications



Search Person

Generate Report Cancel

Search External Candidate

First Name

Middle Name

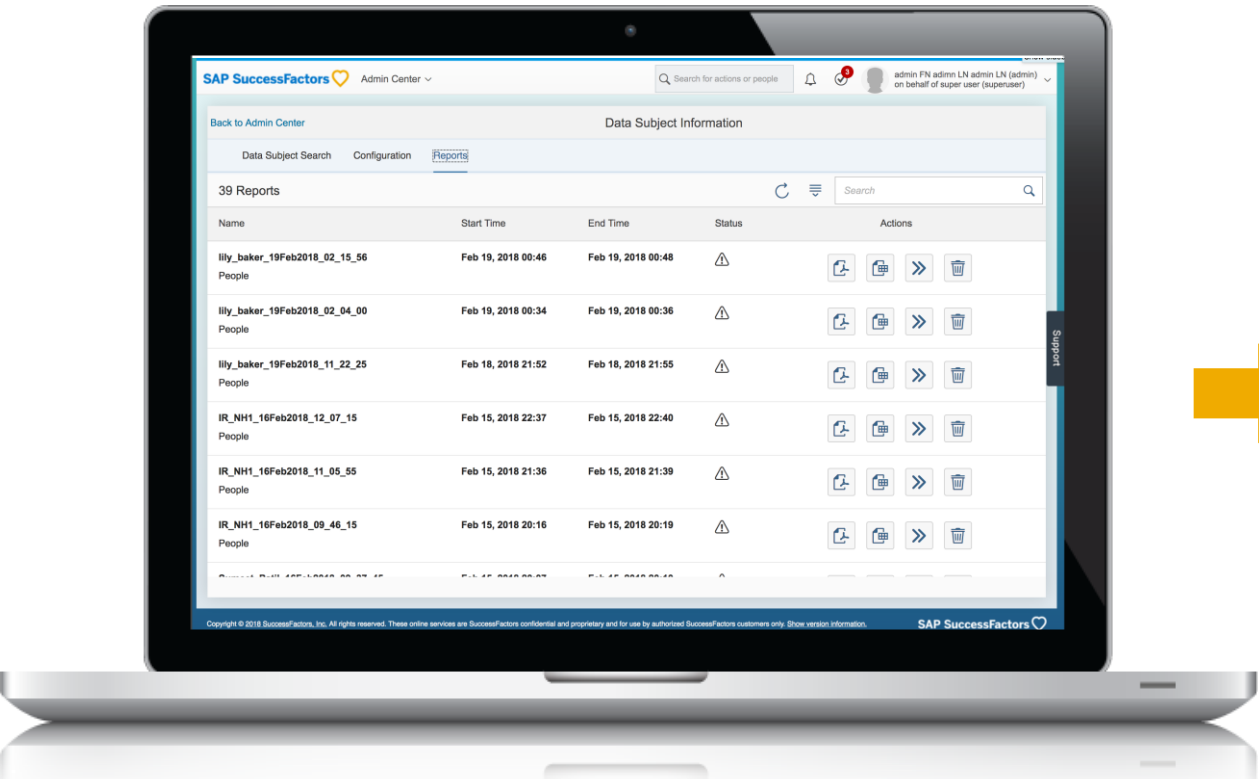
Last Name

Search Cancel

A **single report** is generated for integrated SuccessFactors instances, which pulls data from Employee Central, Recruiting Candidate Management, Learning, Talent, Onboarding and Workforce Analytics.

Download Data Subject Info Report

Check report availability and download



Example report output

Employee Central		
Biographical Information		
Supporting Communication with Authorities		
Data Field Name	Field Value	Data Purpose Category
Country Of Birth	AUS	Supporting Communication with Authorities
Date Of Birth	1972-02-01 00:00:00.0	Supporting Communication with Authorities
Person Id	67	Supporting Communication with Authorities
Place Of Birth	Austria	Supporting Communication with Authorities
Region Of Birth		Supporting Communication with Authorities
Custom date1	2018-02-05 00:00:00.0	Supporting Communication with Authorities
Email Information		
Email Information - 1		
Email Address	business@business.com	Supporting Communication with Authorities
Email Type	Business	Supporting Communication with Authorities
Is Primary	true	Supporting Communication with Authorities
Custom date1	2018-02-07 00:00:00.0	Supporting Communication with Authorities
National ID Information		
National ID Information - 1		
National Id Card Type	ssn	Supporting Communication with Authorities
Territory		
territory Name	United States	Supporting Communication with Authorities
Is Primary	true	Supporting Communication with Authorities
National Id	784-58-5458	Supporting Communication with Authorities
Personal Information		
Personal Information - 1		
First Name	Mary	Supporting Communication with Authorities
Formal Name	Mary Smith	Supporting Communication with Authorities
Gender	F	Supporting Communication with Authorities
Last Name	Smith	Supporting Communication with Authorities
Marital Status	Divorced	Supporting Communication with Authorities
Middle Name		Supporting Communication with Authorities

Ability to download the report in PDF or CSV format

SAP SuccessFactors Data Protection and Privacy Features

Summary by Product Area

Feature	Talent Management	Employee Central	Employee Central Payroll	Platform	Learning	Onboarding	Recruiting Management	Recruiting Marketing	Recruiting Posting	Reporting	Workforce Analytics
Data Purge	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	N/A
Data Subject Info	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓
Data Blocking	N/A	✓	✓	N/A	N/A	N/A	N/A	N/A	N/A	✓	N/A
Consent	✓	N/A	N/A	N/A	✓	✓	✓	✓	✓	N/A	N/A
Change Audit	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	N/A
Read Audit	✓	✓	✓	✓	N/A	✓	✓		N/A	N/A	N/A

N/A – This feature is not needed in the application due to requirements/use case non-applicability

N/A* – This feature is not supported in the application. If you have included sensitive personal data in this application, you should consider removing it from the application data model

Prerequisites: Role Based Permissions (RBP) and Metadata Framework (MDF)

Best Practices (Immediate) for Data Governance

- 1. GET RID OF PAPER DATA**
- 2. Single Point of Contact (i.e., Data Protection Officer)**
- 3. Form multidisciplinary team (IT, HR, DPO, Legal at a minimum)**
- 4. Know what you have (can't protect what you don't know)**
- 5. Insurance coverage – can you get it?**
- 6. Run practice drills for report of breach (remember insurance, public relations)**
- 7. Do what you say you are doing.**
- 8. Anonymize everything you can.**

**Respecting the privacy of people is
good for business**

**SAP is ready for compliance
challenges**

**SAP enables compliance –
data protection and privacy is
in our DNA**



Thank you.

Contact information:

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