



Data Protection and SAP Information Lifecycle Management

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About the Speakers



Jon Harding

CIO, Conair Corporation

Conair is a worldwide consumer products company with brands such as Cuisinart, BaByliss, and Scunci.

“After 17 years in the US, I still enjoy traditional English pursuits like gardening and visiting historic sites. My 18 year old daughter says I am really old!”



Iwona Luther

Product Owner SAP Information Lifecycle Management

SAP representative for the ASUG and DSAG working group “Data Archiving and ILM.”

Author of books and trainings on ILM and GDPR.

“If you see a girl from Warsaw, Poland, who loves ballroom dancing and has the most knowledge of ILM, then that would be me!” 😊

Key Outcomes/Objectives

1. Discover which SAP tools you should use to reach corporate compliance for legislation such as the General Data Protection Regulation (GDPR)
2. Understand which SAP software is used at Conair to help meet compliance

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Personal Disclaimer

SAP does not provide legal advice, nor does the presenter.

The implementation of data protection requirements at any data controller is a complex challenge with interdependent legal and technical aspects. The responsibility to identify and implement adequate technical features remains with the controller as for the organizational aspects.

The following presentation is only about technical features which might in that sense help a controller achieving compliance with data protection regulations.

To help the audience understanding the shown approach, in context information is given without claiming completeness or correctness.

Agenda

1. Introduction to Data Protection
2. SAP tools to achieve corporate compliance for legislation, such as the General Data Protection Regulation (GDPR)
3. SAP Information Lifecycle Management (SAP ILM) components for blocking and destroying people-related data
4. Conair: Implementing SAP solutions to meet compliance

Introduction



Do you need to care about European GDPR?

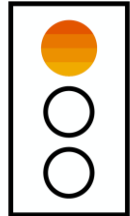


The **General Data Protection Regulation** (GDPR) entered into **force** May 25, 2018.



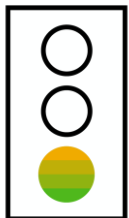
Penalties up to 4% of annual global revenue or **€20 million** whichever is higher

Data protection is simple!



Processing of personal data is forbidden ...

... as long as no justifying reason is given such as ...



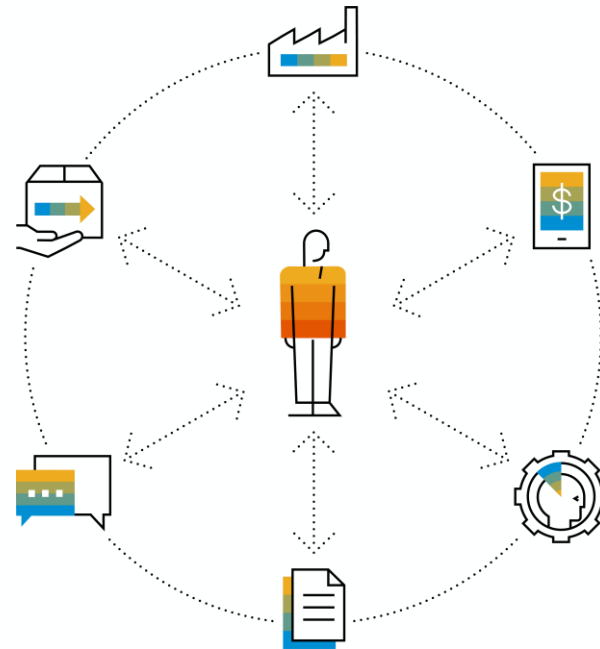
- Contract
- Other legal reasons (allowing or enforcing the processing)
- Effective declaration of consent for the data subject

The justifying reasons must be verifiable and in any processing step.

Definition of Personal Data and Data Subject

Effectively

- Information which identifies individuals
- Information which contains identifiers
- Information containing distinguishing characteristics



Any set of attributes allowing the identification of a data subject

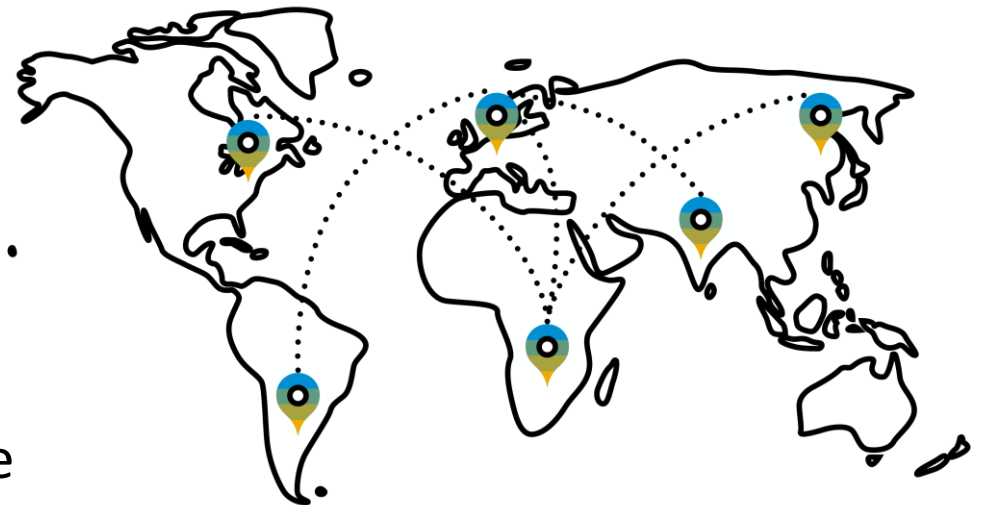
*“Personal data” means **any information** relating to an **identified** or **identifiable natural person (“data subject”)**; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.*

Territorial scope – the world is not enough

Applies for EU-based controllers regardless of whether the processing takes place in the Union or not.

Applies also for non-EU-based controllers:

- Offering goods or services to data subjects in the EU, or
- Monitoring of the behavior of data subjects in the EU.

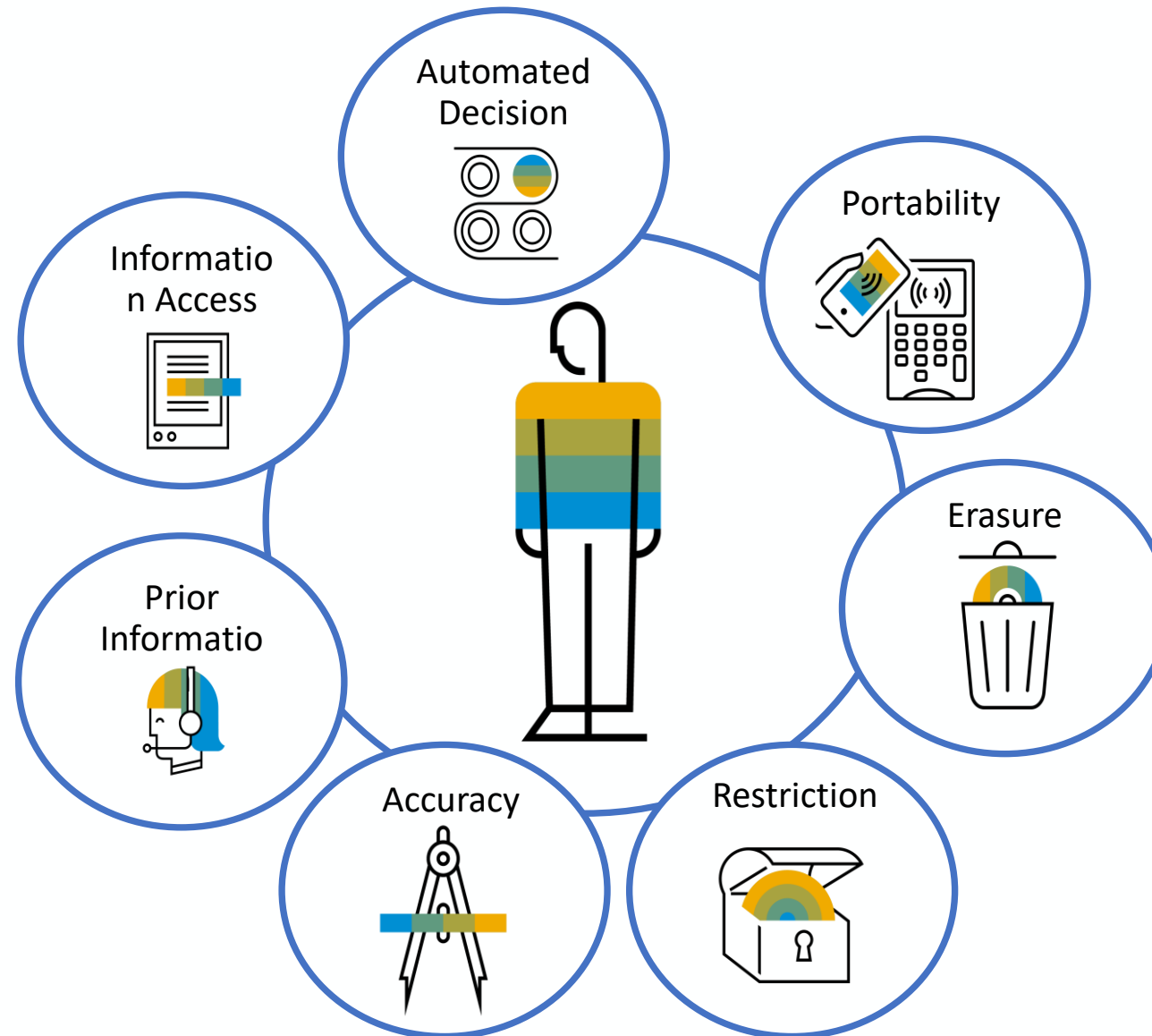


(EU GDPR Art. 3)



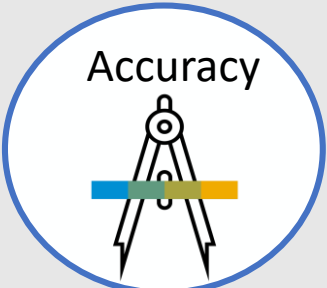
SAP tools to reach corporate compliance for
legislation such as **GDPR**



Rights of the Data Subject - Legal Basis



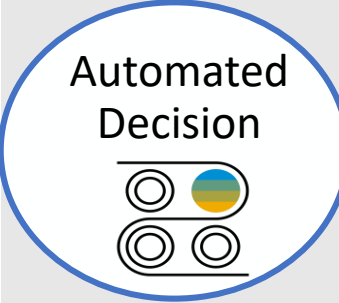


Rights of the Data Subject - Legal Basis

	Content	Possible Technical Feature?
 <p>Prior Information</p>	Information to the data subject on the data undergoing processing, the data controller, the purpose, and the retention policies.	This information is an organizational measure and not a technical feature. <ul style="list-style-type: none">• SAP S/4HANA & SAP Business Suite “Information Retrieval Framework” (IRF) supporting logically.
 <p>Information Access</p>	The data subject’s right to get information on the data undergoing processing concerning them.	Personal data is available for reporting in application-specific reports. <ul style="list-style-type: none">• SAP S/4HANA & SAP Business Suite “Information Retrieval Framework” (IRF)
 <p>Accuracy</p>	Personal data has to be accurate, kept up to date and to be corrected (latest after request).	Correction standard functionality. <ul style="list-style-type: none">• Data Governance by SAP MDG


* = Built-in; others require additional license

Rights of the Data Subject - Legal Basis

	Content	Possible Technical Feature?
	The ability to delete personal data when all retention periods have passed. The ability to block personal data as soon as the primary purpose has passed and the residence time has elapsed.	Deletion capabilities. For SAP S/4HANA and SAP Business Suite concept of the simplified blocking and deletion. <ul style="list-style-type: none">• End of Purpose Checks, Blocking Indicators• SAP ILM Retention Management
	The data subject has the right to obtain from the controller restriction of processing in certain cases.	Logical subject to deletion policies. For SAP S/4HANA and SAP Business Suite. <ul style="list-style-type: none">• SAP ILM Legal Hold
	The data subject has the right, that any automated decision can become subject to manual interference.	Any features providing such capabilities are ensuring, that such decisions can get overruled manually.

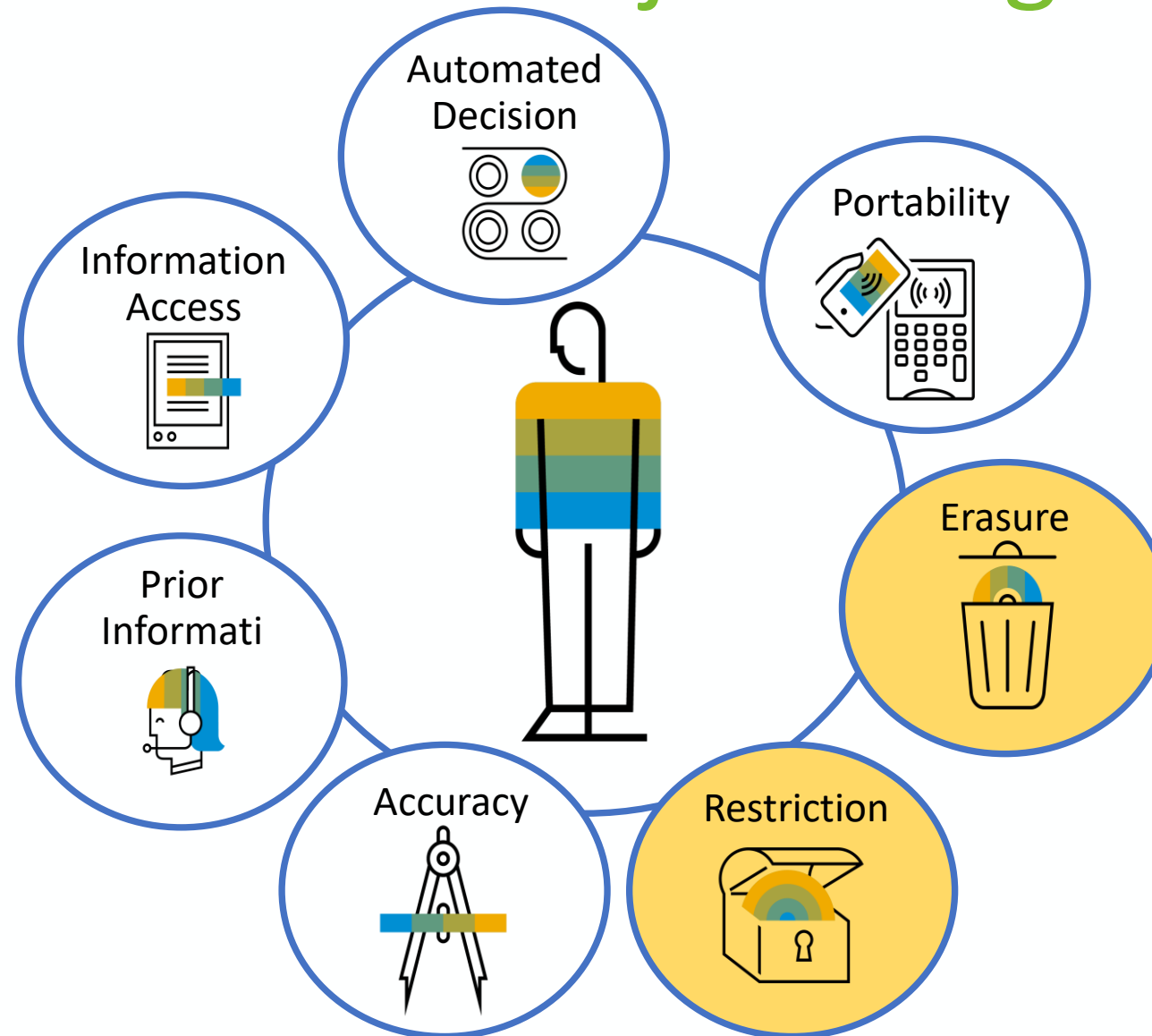
* = Built-in; others require additional license

Rights of the Data Subject - Legal Basis

Content	Possible Technical Feature?
<p data-bbox="180 486 384 525">Portability</p> 	<p data-bbox="1442 429 2346 539">Most Information Access features provide download functionality.</p> <ul style="list-style-type: none"><li data-bbox="1442 558 2390 786">• For SAP S/4HANA and SAP Business Suite the “Information Retrieval Framework” (IRF) is implemented allowing the download.

* = Built-in; others require additional license

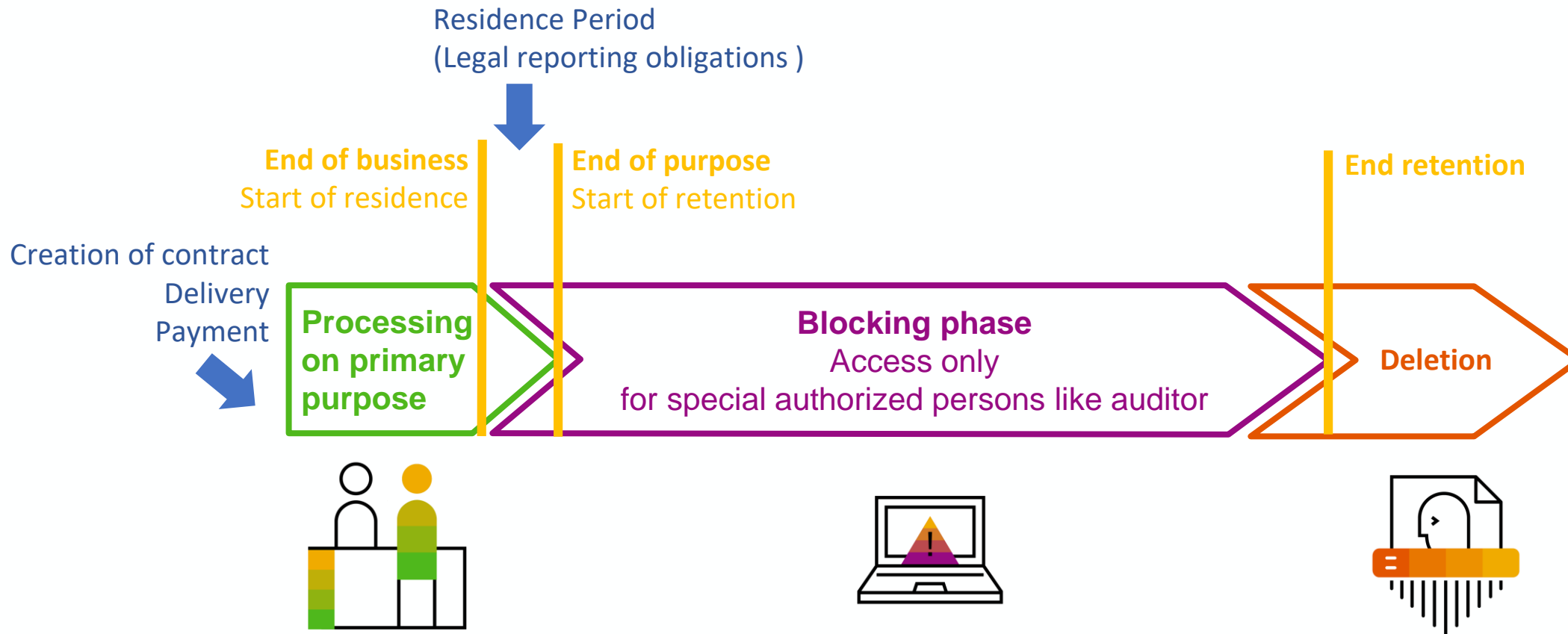
Rights of the Data Subject - Legal Basis



How **SAP ILM components** support you in blocking and destroying people-related data



Lifecycle of personal data



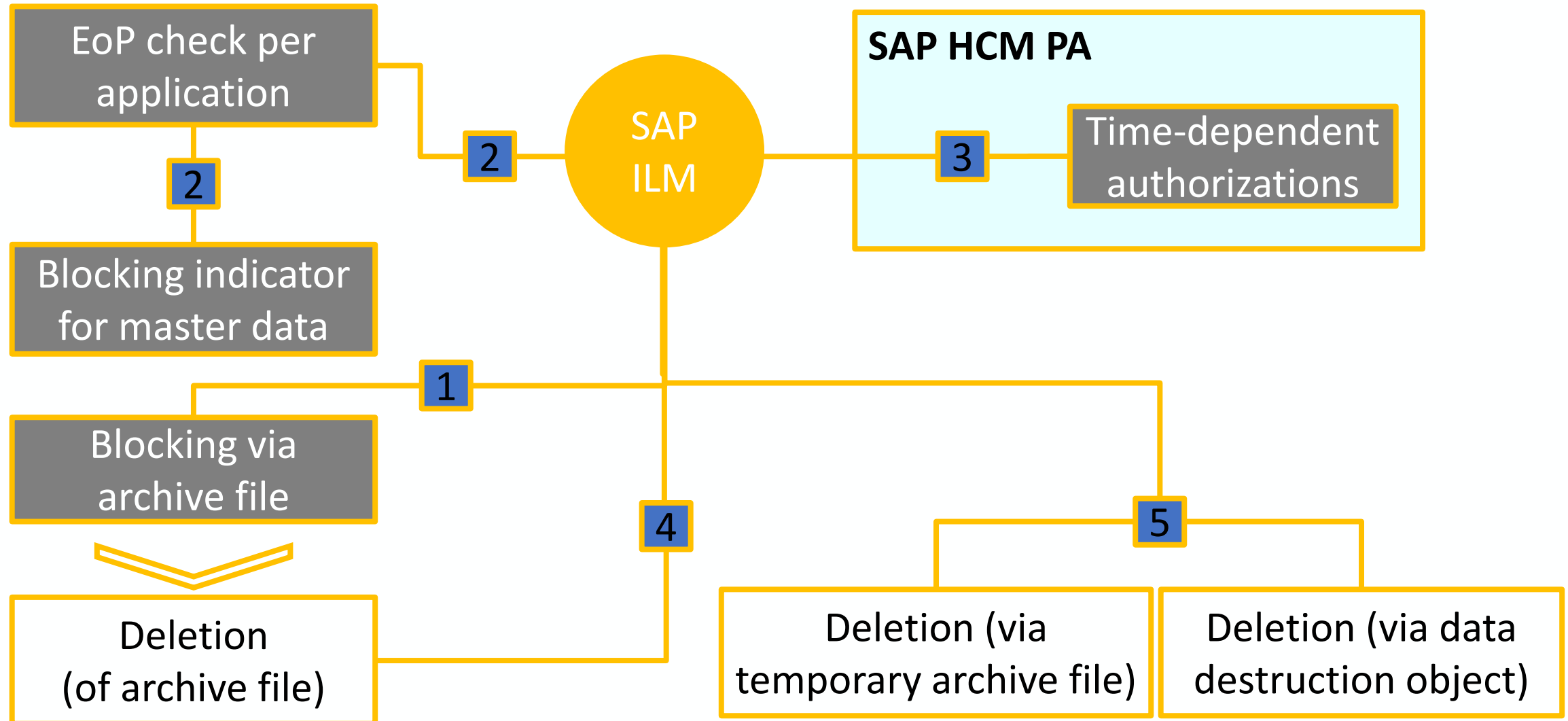
Requirement:

Personal Data that are **no longer needed for the primary processing purpose** must be **deleted**, unless there are other **retention periods** defined by law or contract, in that case it has to be **blocked**.

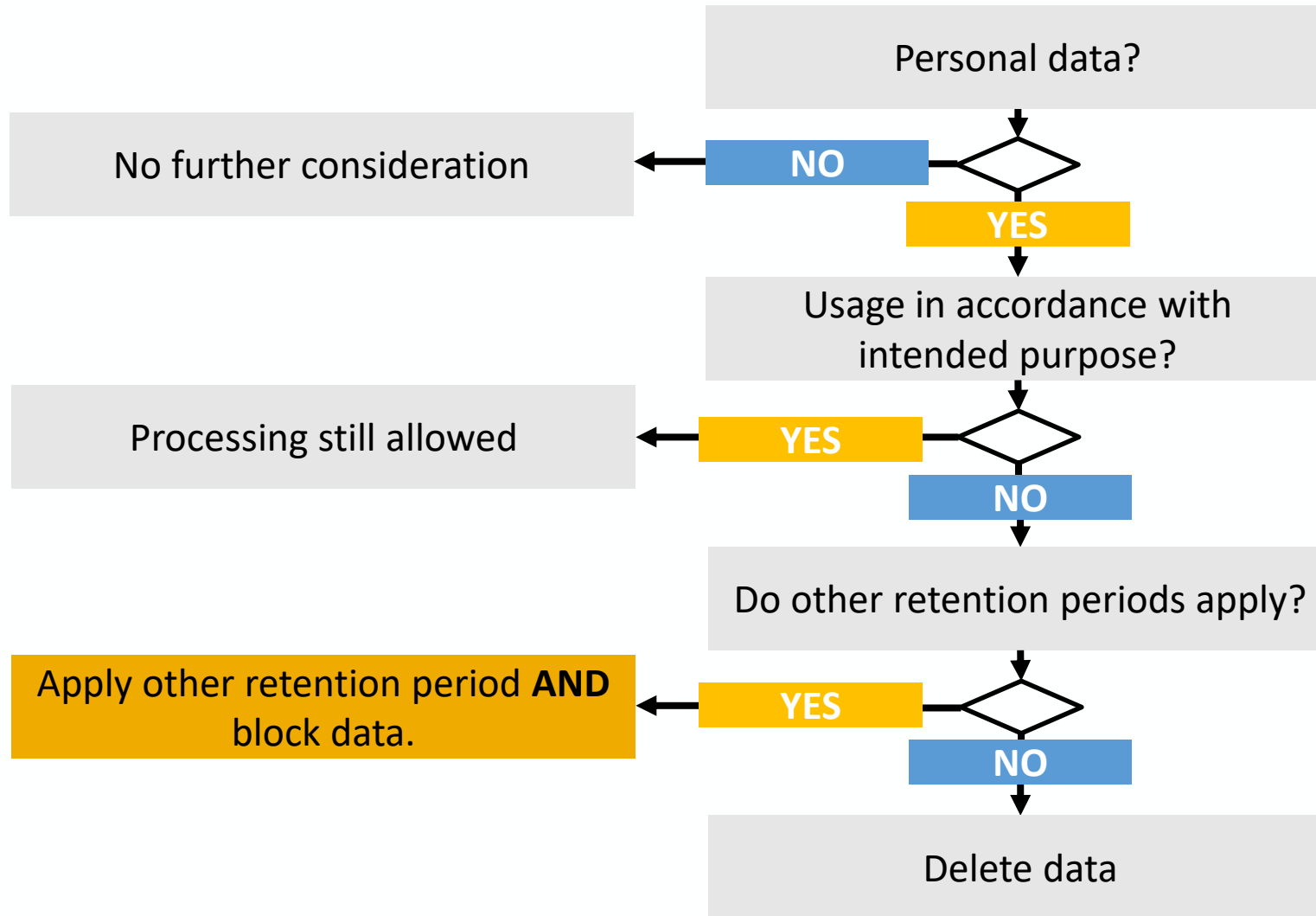
Definitions

- **Personal Data:** any information on an identified or identifiable natural person
- **Purpose:** Purpose of data processing defined in advance by organizational measures
- **End of Business (EoB):** Marks the start of the **residence period**. The length of the residence period is defined in ILM rules. For example, the residence period of a customer starts as soon as all documents in all applications have been completed.
- **End of Purpose (EoP):** Technical method to determine the point in time at which personal data is no longer processed in accordance with its original purpose. Consequently, the data must be **blocked**. Marks the end of the **residence period**.
- **Blocking:** Method of preventing access to personal data that is no longer necessary in relation to the purposes for which it was collected
- **Retention period:** Period of time, required by law, during which (personal) data must be retained
- **Destruction:** Irreversible and adequate deletion of personal data

Blocking and deletion using ILM features



ILM rules: blocking and deletion of personal Data



ILM periods:
residence time

ILM periods:
retention period

Conair: Implementing **SAP solutions** to manage personal data and achieve compliance



EU-GDPR and USA-CCPA



GDPR

General Data Protection Regulation

- Legitimate interest component.
- Protect data against unlawful and accidental destruction.
- Must keep hold of data for no longer than is necessary for the purpose it is processed.
- One month response - GDPR data subject rights, including "right to be forgotten."
- Default to Opt-In for collection/use.
- Fines potentially in the millions of Euro.
- Public complaints for an enforcement body to address.
- Extraterritorial impact on business.



CCPA

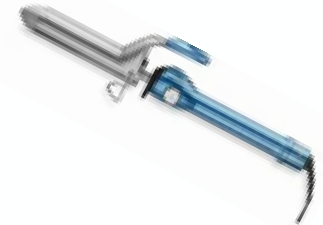
California Consumer Privacy Act

- A business must disclose the personal information collected, sold, or disclosed.
- 45 days day response - CCPA individual rights, including the right to request deletion.
- Upon verified request, a business must delete the personal information the business and its direct service providers collected.
- Allows for Opt-Out collection/use.
- Fines potentially in the millions of dollars.
- Private right of action, class suits.
- Extraterritorial impact on business.

Which data is relevant at Conair?



- Customer and prospect data in SAP CRM
- Customer support interactions in SAP CRM (CIC)
- Employee data in legacy HR systems



What Conair implemented for GDPR

SAP Information Lifecycle Management (ILM):

- Retention matrix with the business and legal team
- Blocking
- Archiving and destruction

Further information 1/2

SAP Public Web

www.sap.com

SAP Education and Certification Opportunities

www.sap.com/education

BIT660 – Data Archiving

BIT665 – Information Lifecycle Management (ILM)

BIT670 – How to develop Data Archiving and ILM solutions for applications in customer name space

GDPR is here – get compliant!

- Comply with the EU's GDPR regulation and avoid costly fines
- Design your IT environment to meet data privacy requirements
- Explore the SAP software solutions that protect sensitive personal data

Save 15% off the print price and get the e-book for FREE!
Purchase today at the SAP PRESS booth on the Concourse Level.

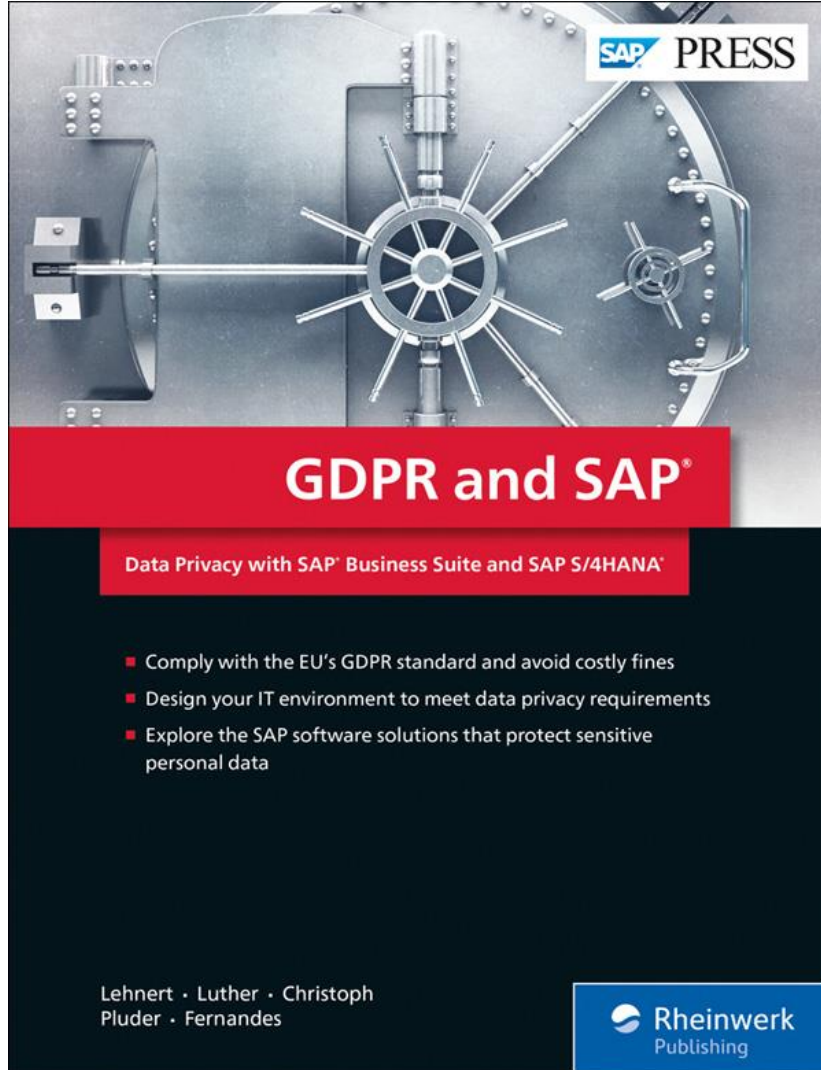
GDPR and SAP

Data Privacy with SAP Business Suite and SAP S/4HANA

Written by: Lehnert, Luther, Christoph, Pluder, Fernandes

430 pages | 07/2018 | **E-book:** \$99.99 | **Print:** \$109.95 | **Bundle:** \$119.99

Find the book and e-book at www.sap-press.com/4652



“Summary...”

**“If you think compliance is
expensive, try non-compliance.”**

US Deputy Attorney General Paul McNulty

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Q&A

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