GDPR: Intelligent Implementation with SAP ILM and PBS add-on Solutions

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PBS software

Agenda

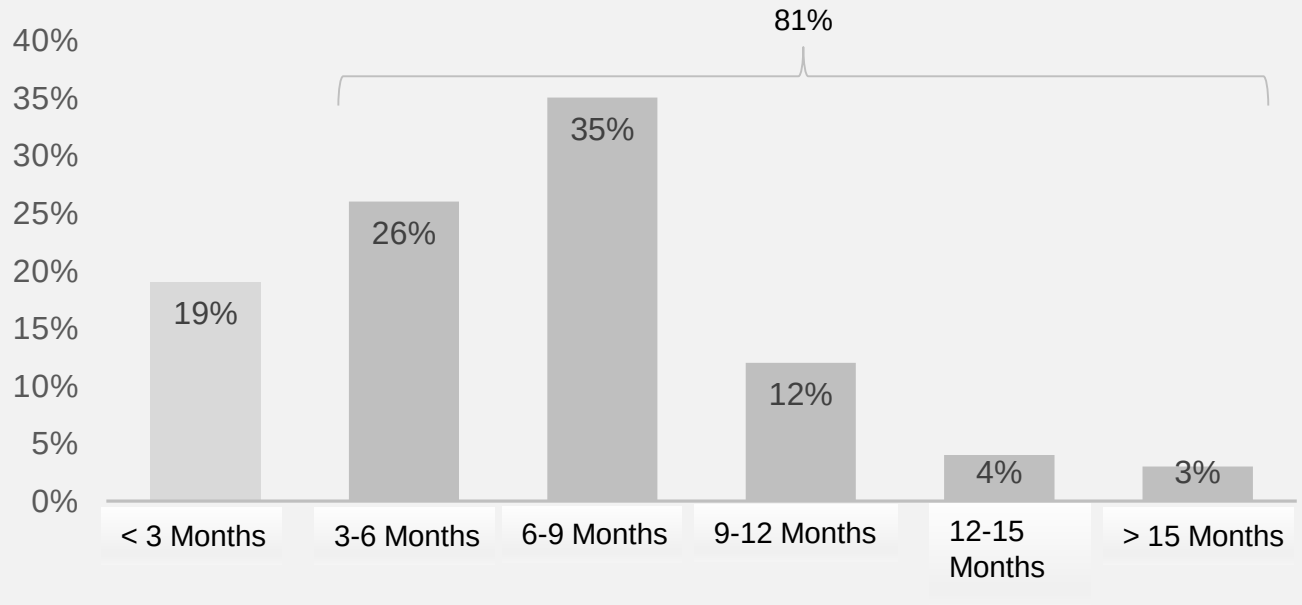
1. General Data Protection Regulation (GDPR)
   - Definition and current Status
   - Personal Data
   - Affected SAP Systems
2. Conversion with SAP ILM
   - Blocking and Deletion with SAP ILM
   - Intelligent Implementation with PBS add-on Solutions
3. Conversion without SAP ILM
   - Intelligent Implementation with PBS add-on Solutions

GDPR for Beginners

https://youtu.be/QOmm9hdwzLU

GDPR: What stage have you reached?

Beginning now (March/April 2018), how much longer does your organization take to completely comply with GDPR?



→ According to the Capgemini study more than four out of five companies miss the GDPR requirements.

Source: own presentation according to the Capgemini Digital Transformation Institute, GDPR Executive Survey, March-April 2018

General Data Protection Regulation (GDPR)

Regulations for the protection of the rights of persons when processing personal data

Substitution of earlier directives and further parts of the German Federal Data Protection Act and Harmonization of the Data Protection Right in Europe

Right of access, right to object, right to rectification, right to erasure, right of restriction and right to data portability

Obligations to process personal data

Obligation to establish technical and organizational measures, documents of processing and data protection impact assessment

Fines of up to 20 mill. € or 4% of the total turnover of a company in the case of a violation

Source: https://compliancechannel.tv/video/compliance-channel-nugget-datenschutz/

GDPR: Personal Data

Personal Data that are typically in a company:

User Data

- IP addresses
- Login Data
- Social Media Data, Email Addresses
- Cookie Flag

Customer Data

- IP addresses
- Address, Email Address
- Sales History, CRM Data
- Account and Credit Card Data

Employee Data

- Address, Email Addresses
- Initials of Employees
- Login Details
- Personnel Data (sick leave, religion)

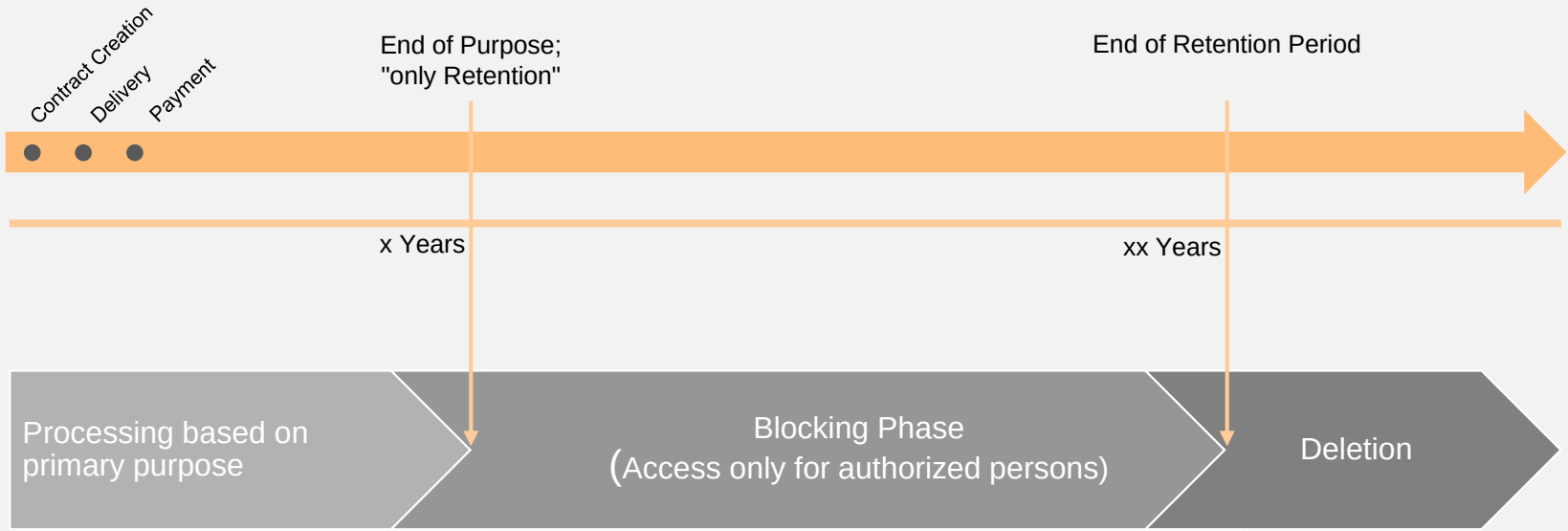
Source: IX 5/2018

Intelligent Implementation with the PBS Solutions

PBS gives support in the **technical** implementation of the GDPR in the SAP environment, for example for

1. Implementation of suitable storage systems
2. Implementation of blocking or deletion requirements
3. Identifying personal data

GDPR: Lifecycle of personal Data



Requirements:

Personal data that is no longer needed for the primary purpose must be deleted, unless there are other retention periods defined, in that case, it has to be blocked.

Source: Own presentation according to SAP, lifecycle of personal data

GDPR: Which SAP Systems are affected?

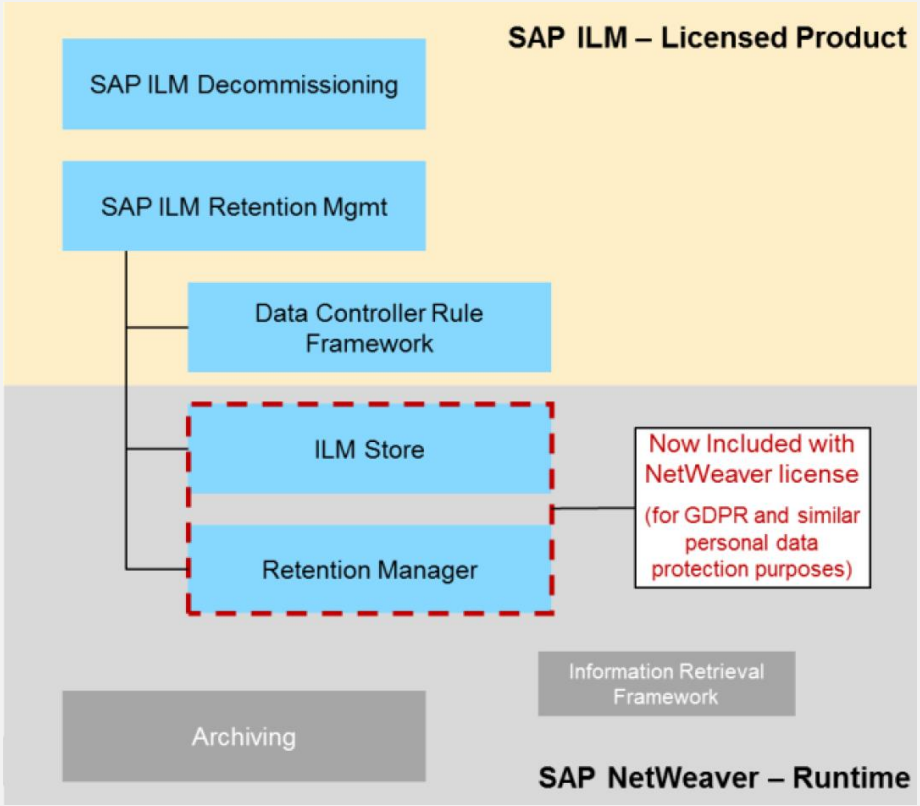
→ The marketplace principle is valid

- The GDPR regulations always apply when personal data is collected about affected people who are located in the EU.

- This is also particularly valid for companies that provide goods and services in the EU, without operating a physical organizational structure or business structure within the EU! (Article 3, paragraph 2)

→ **All** SAP company codes that represent business relationships with EU citizens/companies are affected!

Implementation **with** SAP ILM Components



Release Prerequisites:

- ERP: SAP ERP 6.0 EHP7 SP12
- CRM: SAP CRM 7.0 EHP3 SP05
- IS-U: SAP ERP 6.0 EHP7 SP08
- HCM: SAP ERP 6.0 EHP6 SP16

Scope:

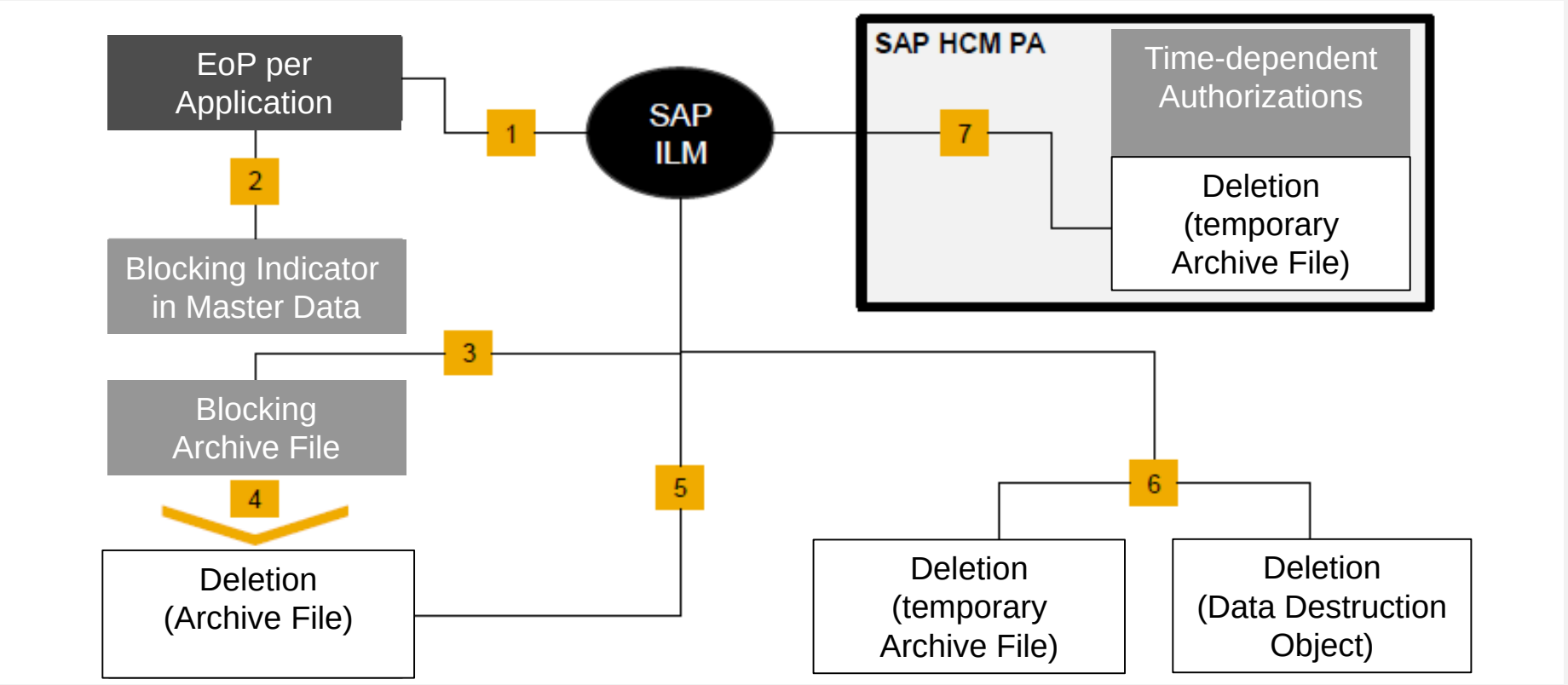
- End of purpose checks (EOP) for more than 120 modules/applications available
- Possibilities how to handle blocked data in transactions and reports
- Complete ILM enablement of archiving objects in corresponding modules/applications

free license since January 15, 2018

Source: SAP, 2018

Implementation **with** SAP ILM Components

Overview: Blocking and Deletion with SAP ILM Tools

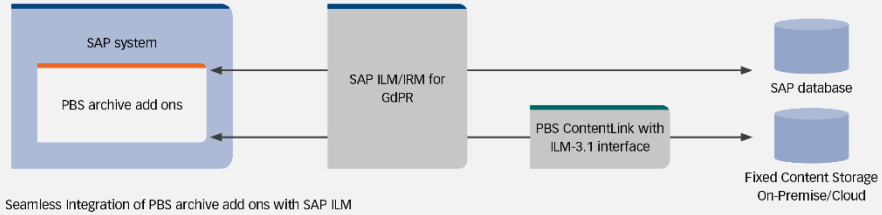


Source: SAP

Implementation of suitable Storage Systems

Necessary Infrastructure Measures
Responsibility for retention, management of application data and **deletion process**:

- Enhancement of data objects by metadata such as retention, blocking and deletion information
- Implementation of transfer protocol WebDAV as leading archiving protocol in connection with SAP ILM/IRM
- Blocking of application data on object level (object level retention)
- Support by Fixed Content Storage **essential**



Seamless Integration of PBS archive add ons with SAP ILM

Definition of Blocking and Deletion Requirements

SAP IRM – Rule Characteristics

Master Data

ILM Policies

Continue | New

* Policy Category:	Residence Rules
* Object Category:	SAP Business Suite
Audit Area:	BUPA_DP (BUPA_DP)
ILM Object:	

Policies

Change Status | Transport | Export | Import | Overview

ILM Object	Policy Name	Policy Status	Object in Audit Area	Changed on
FI_ACCKNVK	PBS_KUNDE	Live	☑	11.01.2018
FI_ACCRECV	PBS_KUNDE	Live	☑	11.01.2018

Rules for Policy PBS_KUNDE

Application Name	Residence Time	Residence Time Unit	Time Ref.
	0	Day	Start of Retention Period

Transaction Data

ILM Policies

Continue | New

* Policy Category:	Retention Rules
* Object Category:	SAP Business Suite
Audit Area:	PBSGENERAL (General Rules)
ILM Object:	

Policies

Change Status | Transport | Export | Import | Overview

ILM Object	Policy Name	Policy Status	Object in Audit Area	Changed on
FI_DOCUMNT	PBS_BSCHL	Not Live	☑	16.04.2018
FI_DOCUMNT	PBS_BUKRS	Live	☑	17.04.2018

Rules for Policy PBS_BUKRS

Company Code	To	Authorization Group	Min. Retent. Time	Max.Retention Time	Retention Time Unit	Time Ref.
1000			10	12	Year	End of Year
1000		NM01	17		Year	End of Year

Documents

ILM Policies

Continue | New

* Policy Category:	Retention Rules
* Object Category:	SAP Business Suite
Audit Area:	DEMO (Sample Audit Area)
ILM Object:	AL_DOCUMENTS

Policies

Change Status | Transport | Export | Import | Overview

Policy Name	Policy Status	Object in Audit Area	Changed on	Changed by
DEMO_WS	Live	☑	15.05.2018	MEIER

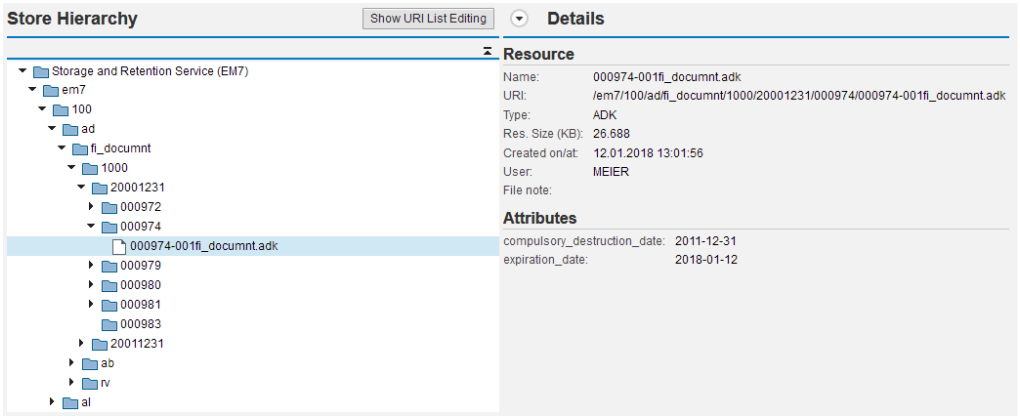
Rules for Policy DEMO_WS

Authorization Group	Inherit Rule	Min. Retent. Time	Max.Retention Time	Retention Time Unit	Time Ref.
	☐	1	5	Day	Storage Date

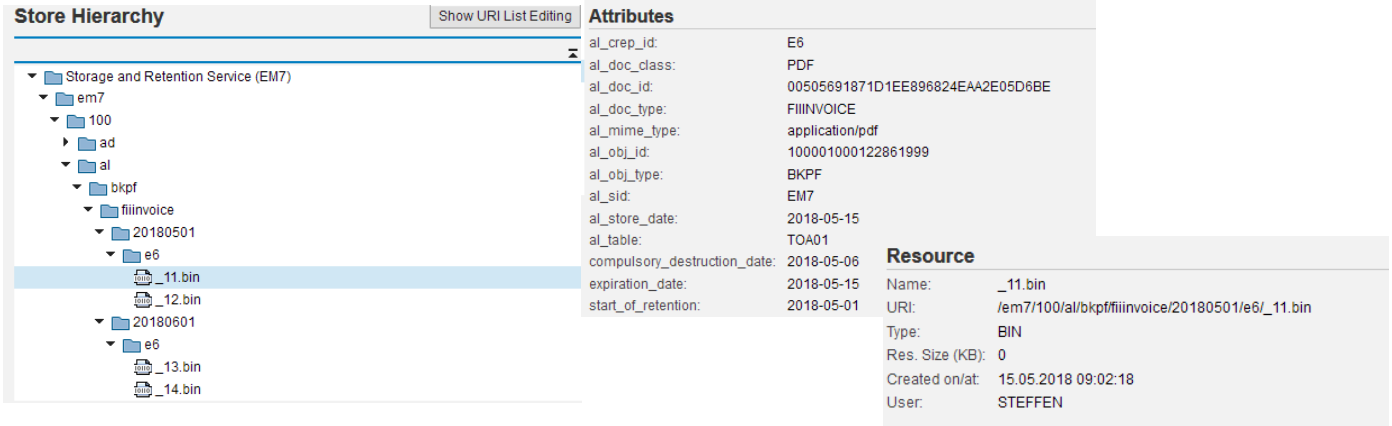
SAP WebDAV Administration

SAP ILM Storage Browser

Archive Files



Documents



Implementing Blocking and Deletion Requirements

Seamless Implementation of IRM Rules with PBS archive add ons

Block master data

IRM function CVP_PRE_EOP

Synchronous blocking in the PBS transactions with reference to master data analog to SAP standard

Example: /PBS/FBL5N (customer line items)

Block transaction data

IRM authorization check S_IRM_BLOC

Synchronous blocking in the PBS transactions with reference to transaction data analog to SAP standard

Example: /PBS/RFBELJ00 (document compact journal)

Delete archive data (master/transaction data)

IRM function ILM_DESTRUCTION

Synchronous

PBS data access to orphaned ADK files are prevented in the PBS archive add ons

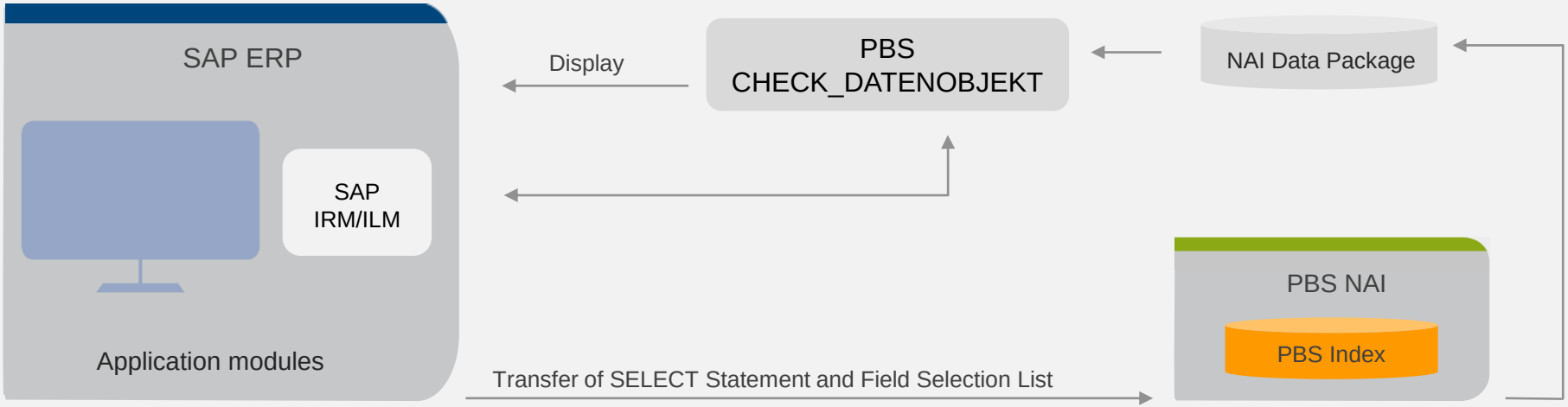
Aynchronous

Function to correct PBS index data with reference to orphaned ADK files in the PBS archive add ons

Implementing Blocking and Deletion Requirements

PBS NAI and GDPR

- PBS routine CHECK_DATENOBJEKT
- ILM_BLOCKING check on PBS index level (file index/NAI index)
- Implementation also in preparation for NAI tables from PBS archive add ons with document-style index structures (CFI, CCO, CCOPA, CFICA and other)



Implementing Blocking and Deletion Requirements

Implementation of Archive Files for SAP ILM:

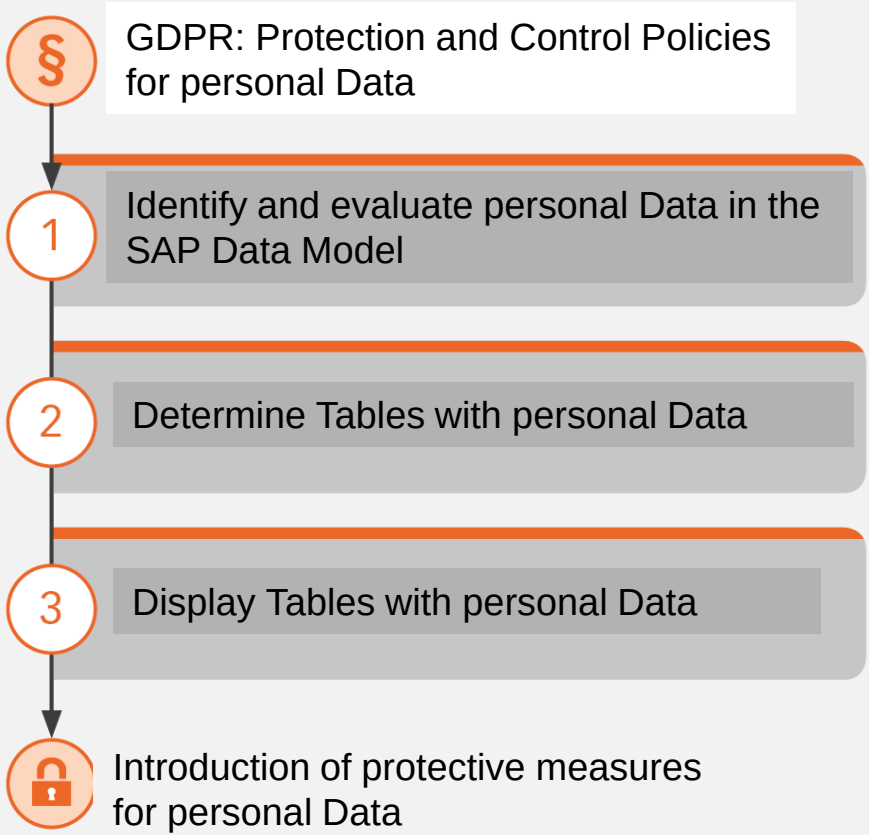
Generally possible → Report RSARCH_CONVERT_TO_ILM

Recommendation:

- Using IRM rules for current application cases first
- Subsequent adaptations of the rules require an implementation of the already existing WebDAV data.
  The IRM rules for blocking are also applied for existing archive files that were created before the ILM activation!
- Conversion of legacy archives to the ILM/IRM context done after first thoroughly checking the robustness of the IRM rules
- In an “emergency”: Temporarily decouple data access to legacy archives by archiving administration entries with BC_ARCHIVE (reload is possible!).

Identify personal Data:

PBS GDPR Analyzer



Identify personal Data :
PBS GDPR Analyzer

TA /PBS/GDPR_ANA – Display Tables with Reference to personal Data

/PBS/GDPR_DD03VT: Display

	Description	Archiving object	PBS archive add on	Table entries
/PBS/GDPR_DD03VT / 13565900	STEFFEN / 07.05.2018 / 13:57:01 / &Eval&EVALUATION RUN 07...			
BC-CCM-ADK	Archive Development Kit			
ADMI_JOBS	Archive Jobs			239
ADMI_PARAMS	Parameter for Archiving (ADK, AS, TAANA, DRB)			3
ADMI_RUN	Archive Runs Header Data	BC_ARCHIVE		1.396
BC-SRV-ADR	Address Management/Business Address			
ADCP	Person/Address Assignment (Business Address Services)	/BOFU/BODC, /BOFU/BOTC, /S...	CCMD, CMM, CMT, C...	313.252
ADCPS	Shadow Table: Assignment Person/Addr. (Bus. Addr. Services)			6.200
ADQUINDX	INDX-type table for quarterly adjustment addresses			120
ADR6	E-Mail Addresses (Business Address Services)	/BOFU/BODC, /BOFU/BOTC, /S...	CCMD, CMM, CMT, C...	301.871
ADR6S	Shadow Table: SMTP Numbers (Business Address Services)			3.181
ADRC	Addresses (Business Address Services)	/BOFU/BODC, /BOFU/BOTC, /S...	CCMD, CMM, CMT, C...	31.023
ADRCS	Shadow Table: Addresses (Business Address Services)			11
ADRCS2	Shadow Table 2: Addresses (Business Address Services)			954
ADRP	Persons (Business Address Services)	/BOFU/BODC, /BOFU/BOTC, /S...	CCMD, CMM, CMT, C...	309.297
ADRPS	Shadow Table: Persons (Business Address Services)			6.200
PS-REV	Revenues and Earnings			

Output

<T_DATA>

CLIENT	ADDRNUMBER	DATE_FROM	NATION	NAME1	NAME2	NAME3
100	0000000104	0001-01-01				
100	0000000105	0001-01-01		Dresden		
100	0000000110	0001-01-01				
100	0000000111	0001-01-01		Atlanta	Atlanta	
100	0000000112	0001-01-01		Los Angeles	Los Angeles	
100	0000000114	0001-01-01		Toronto	Toronto	
100	0000000116	0001-01-01		Sales office 03 USA		
100	0000000117	0001-01-01		Sales office San Diego		
100	0000000118	0001-01-01		Versand Frankfurt (allg.)		
100	0000000121	0001-01-01		BestRun Germany	Martin Steiner, Kathrin Walther,	Bernd Zecha, Don
100	0000000122	0001-01-01		IDES UK LTD	Martin Steiner, Kathrin Walther,	Bernd Zecha, Don
100	0000000123	0001-01-01		IDES US INC	Dan Gallagher	
100	0000000125	0001-01-01		IDES Canada	Susan Pitten	
100	0000000128	0001-01-01		Verkaufsburo Deutschland Süd		
100	0000000129	0001-01-01		Verkaufsburo Deutschland Nord		
100	0000000130	0001-01-01				
100	0000000131	0001-01-01		Plant 4100		
100	0000000133	0001-01-01		Christian Lehmann	c/o Carbor GmbH	Geschäftsleitung
100	0000000136	0001-01-01		Vertriebsorganisation Deutschland		
100	0000000139	0001-01-01		Rail Shipping Point US		
100	0000000140	0001-01-01		Truck Shipping Point US		
100	0000000141	0001-01-01		Michael Schulz	c/o Becker AG	
100	0000000245	0001-01-01		Werk Hamburg		
100	0000000253	0001-01-01		IDES PORTUGAL	Martin Steiner, Kathrin Walther,	Bernd Zecha, Don
100	0000000256	0001-01-01		IDES Australia		
100	0000000257	0001-01-01		IDES France	Eric Bertoni	

/PBS/GDPR_DD03VT: Display

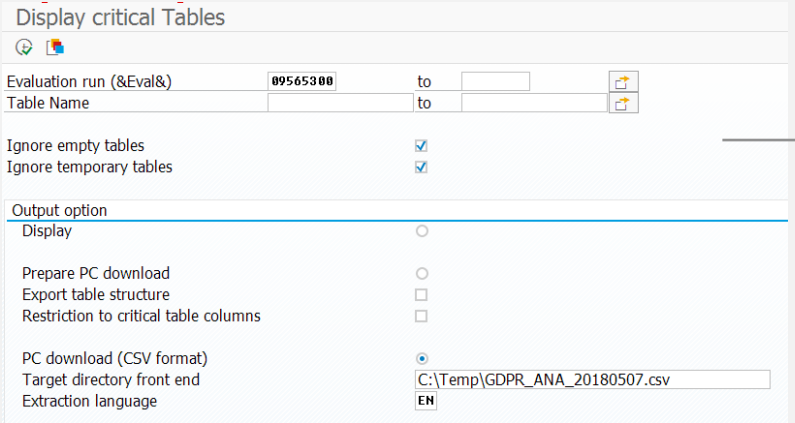
Relevant fields for table ADRC

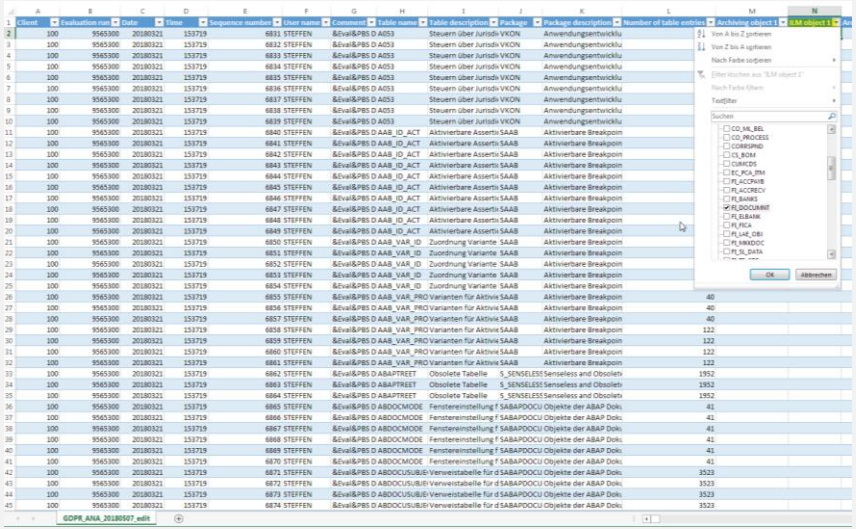
Field Name	Data element	DTyp	Lngth	Short	Medium Fld Labl	Long Field Label
NAME1	AD_NAME1	CHAR	40	Name	Name	Name
NAME2	AD_NAME2	CHAR	40	Name 2	Name 2	Name 2
NAME3	AD_NAME3	CHAR	40	Name 3	Name 3	Name 3
NAME4	AD_NAME4	CHAR	40	Name 4	Name 4	Name 4
NAME_TEXT	AD_NAMETXT	CHAR	50	Conv. name	Conv. name	Converted Name
NAME_CO	AD_NAME_CO	CHAR	40	c/o	c/o	c/o
CITY1	AD_CITY1	CHAR	40	City	City	City
CITY2	AD_CITY2	CHAR	40	District	District	District
HOME_CITY	AD_CITY3	CHAR	40	City	Different City	Different City
POST_CODE1	AD_PSTCD1	CHAR	10	Postl Code	Postal Code	Postal Code
POST_CODE2	AD_PSTCD2	CHAR	10	Postl Code	PO Box Post Cde	PO Box Postal Code
POST_CODE3	AD_PSTCD3	CHAR	10	Postl Code	Company Post Cd	Company Postal Code
PO_BOX	AD_POBX	CHAR	10	PO Box	PO Box	PO Box
PO_BOX_LOC	AD_POBXLOC	CHAR	40	PO Box cty	PO Box City	PO Box City
CITY_CODE2	AD_CIT2NUM	CHAR	12	City Code	City Code	City Code
PO_BOX_CTY	AD_POBXCTY	CHAR	3	POBox ctry	PO box country	PO box country
STREET	AD_STREET	CHAR	60	Street	Street	Street
STREETCODE	AD_STRNUM	CHAR	12	Street Cd.	Street Code	Street Code
HOUSE_NUM1	AD_HSNM1	CHAR	10	House No.	House Number	House Number

+ download function
incl. SAP ILM object
or data destruction object

Identify personal Data :
PBS GDPR Analyzer

Download Analysis Result for Subsequent Processes



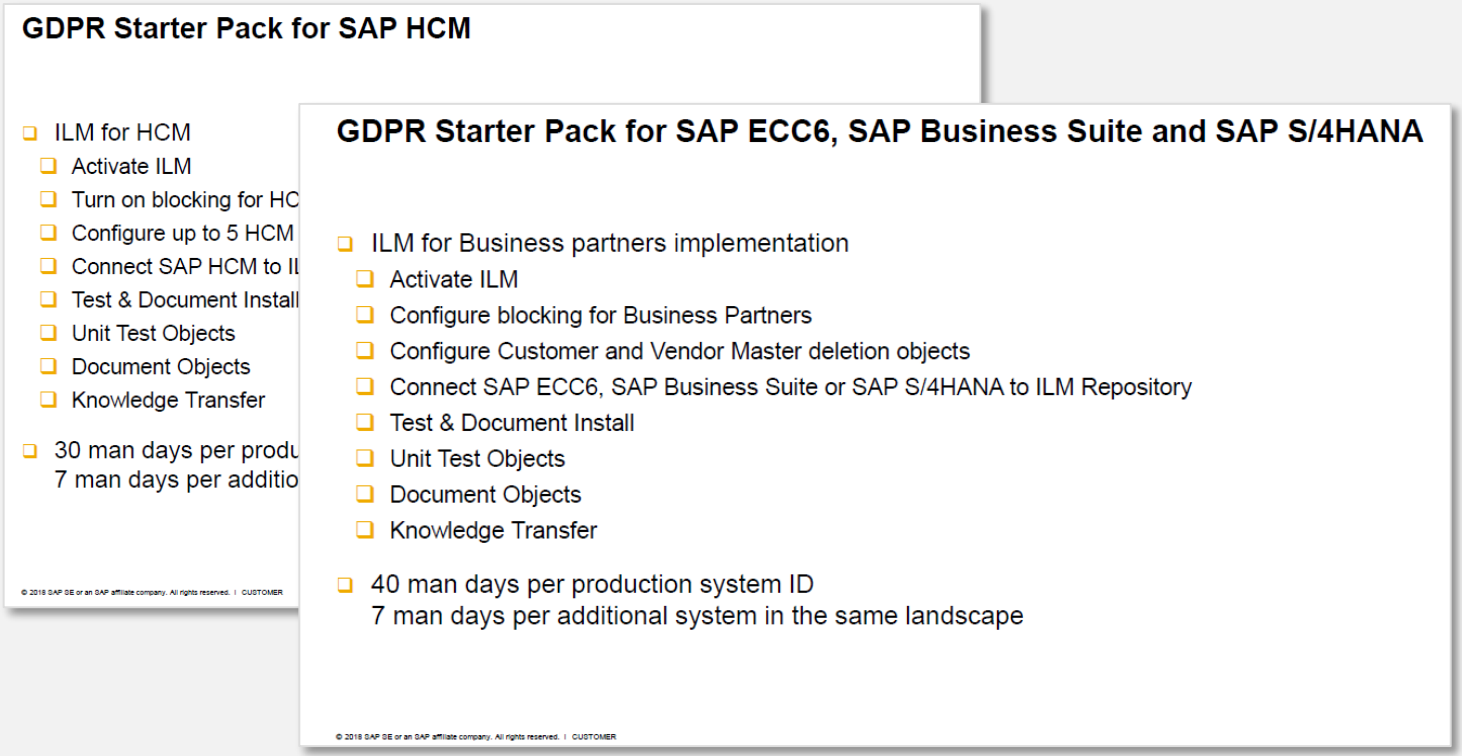


Download includes, among others,

- number of entries per table
- archiving object
- ILM object
- destruction object
- table structure (optionally)

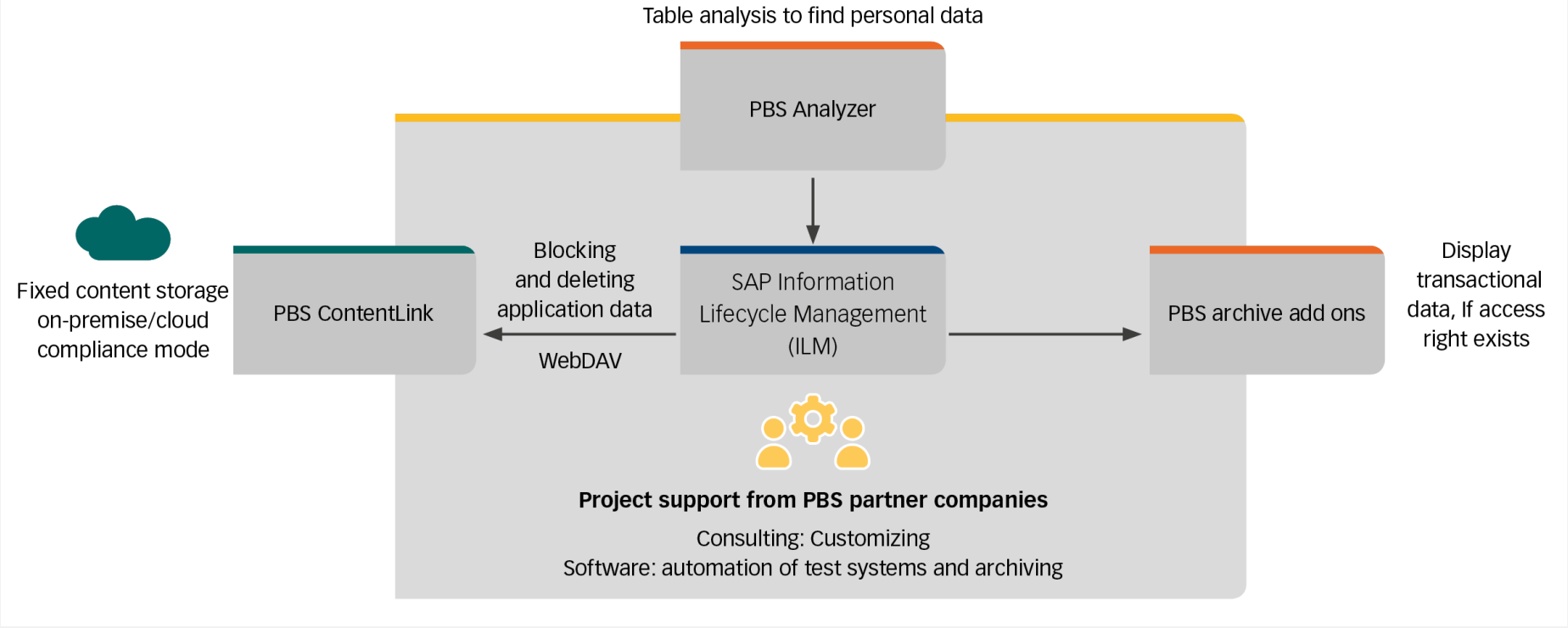
GDPR: PBS Partners

SAP Starter Packs:



PBS – ILM Components GDPR

Effectively restrict Processing of personal Data



Solution **without** SAP ILM Components

Initial Situation:

SAP ILM with WebDAV **cannot** be realized due to release, capacity or time restrictions

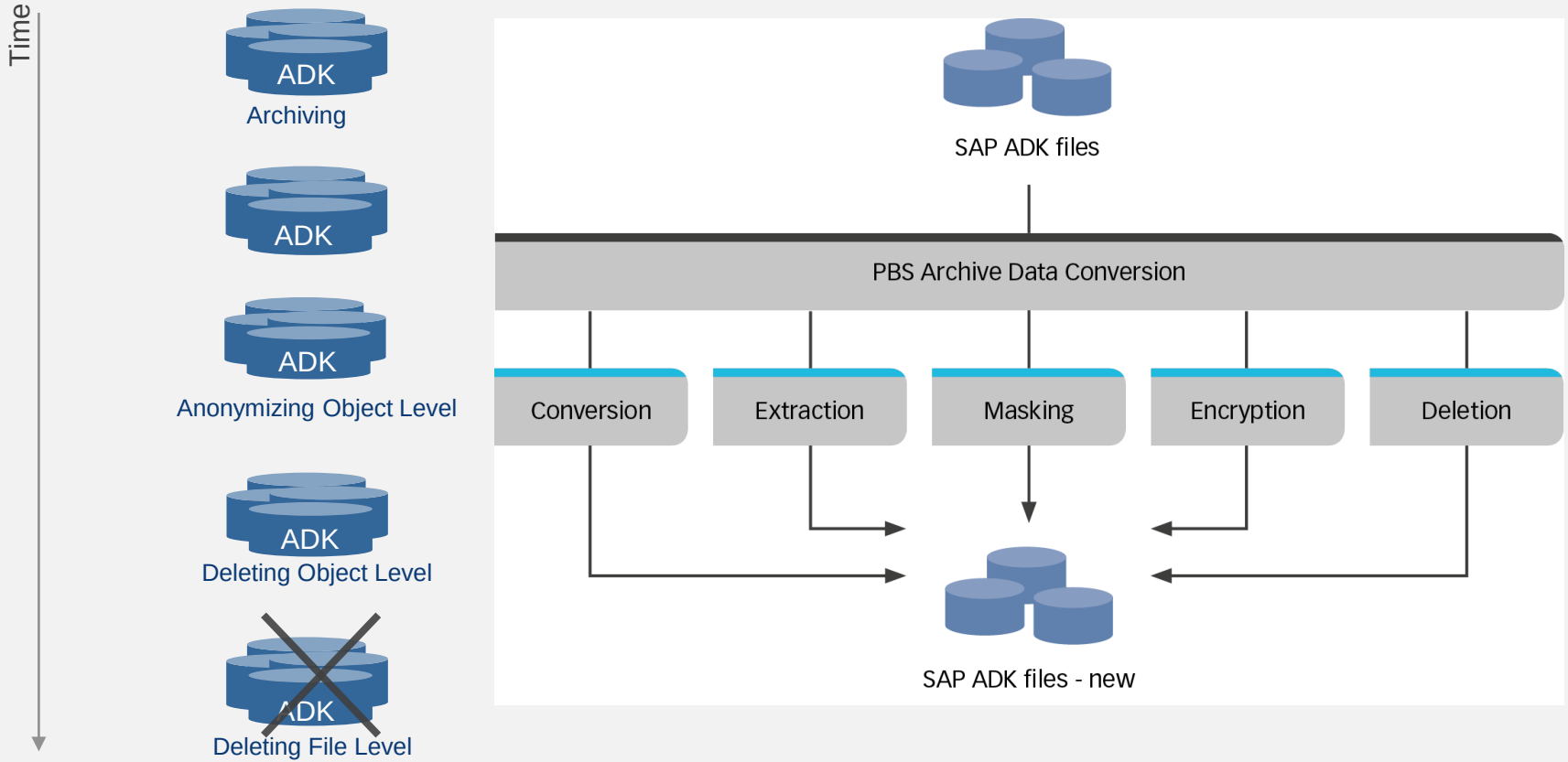
Measures:

- Implementation of blocking and deletion scenarios by using SAP data archiving with the **ArchiveLink protocol**
- Short residence periods for transaction data, regular archiving runs per archiving object/chain.
- Using ADK object BC_ARCHIVE and ADMI_SKIP to block archive files and single objects
- Using PBS Archive Data Conversion to correct ADK files

→ Individual customer project to implement the requirements

Solution **without** SAP ILM Components

Enhanced Lifecycle Management for Application Data with PBS Archive Data Conversion



Summary

- Seamless interaction between SAP IRM and PBS components
- Creation of a GDPR compliant infrastructure (protection, blocking, deletion) using PBS ContentLink
- PBS archive add ons as ideal extension for GDPR-initiated archiving processes (timely blocking of application data)
- Implementation projects accompanied by consulting partners with GDPR expertise

Any Questions? Send your inquiries to GDPR@pbs-software.com

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