

This Privacy Statement was updated on 30.03.2022

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## Privacy Statement

Protecting the individual's privacy is crucial to the future of business. We have created this Privacy Statement to demonstrate our firm commitment to the individual's right to data protection and privacy. This Privacy Statement outlines how we handle information that can be used to directly or indirectly identify an individual.

### A. GENERAL INFORMATION

#### **Who is the Controller.**

The controller for SAP Alumni Network (<https://sap-alumni.com>) is SAP SE, Dietmar-Hopp-Allee 16, 69190 Walldorf, Germany ("SAP") and its data protection officer can be reached at [privacy\[@\]sap.com](mailto:privacy[@]sap.com).

#### **What Personal Data does SAP collect?**

If you register for SAP Alumni Network (<https://sap-alumni.com>), SAP will collect the information you provide to SAP, which consists of [e.g. (but not limited to) name, email address, profile picture, gender, date of birth, social media channels, professional experience, education and skills] ("Personal Data").

SAP may video-document any session during virtual SAP Alumni events, a voluntary offering of SAP Alumni Network based on its legitimate interest for the purpose of broadcast to SAP Alumni that are not attending in person. By attending a virtual SAP Alumni events, you acknowledge that we may record your image and voice by available means as part of a virtual SAP Alumni event recording where you are a non-material part such event according to and as allowed under applicable law. During panel or other discussion sessions where you volunteer to speak, you acknowledge that we may broadcast or film you individually. If you do not wish to be broadcasted, filmed or photographed in this way, please refrain from volunteering. You are responsible to avoid any quotes, recordings or other commentary if you do not wish to be broadcasted, filmed or photographed in the discussion at a virtual SAP Alumni event.

#### **Why does SAP need your Personal Data?**

As a general principle, your granting of any consent and your provision of any Personal Data hereunder is entirely voluntary. SAP requires your Personal Data to

- provide you access to SAP Alumni Platform to network with other SAP Alumni
- deliver invitations for exclusive SAP Alumni Events
- inform you about information of interest for SAP Alumni via mails
- inform you about job opportunities and consulting work
- enable SAP Alumni to message between members of the SAP Alumni Network

There are no detrimental effects on you if choose not to consent or to provide Personal Data. However, without certain Personal Data you will not be able to access the member directory, the non-public web offering or newsletter. In these cases, it will unfortunately not be possible for SAP to provide you with what you request without the relevant Personal Data.

Kindly note that you can participate in SAP Alumni Network (<https://sap-alumni.com>), even without providing a consent into SAP's marketing operations.

#### **How long will SAP store your Personal Data**

SAP will only store your Personal Data for as long as it is required

- to make all assets of SAP Alumni Network (<https://sap-alumni.com>) available to you
- to allow you to participate in SAP Alumni Dialogue Sessions

SAP will also retain your Personal Data for additional periods if it is required by mandatory law to do so, or where your Personal Data is required for SAP to assert or defend against legal claims. In such case, SAP will retain your Personal Data until the end of the relevant retention period or until the claims in question have been settled.

### **Who are the recipients of your Personal Data and where will it be processed?**

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

- companies within the [SAP Group](#);
- third party service providers; for the provision of the website or newsletter dispatch.

As part of a global group of companies operating internationally, SAP has affiliates (the “[SAP Group](#)”) and third-party service providers outside of the European Economic Area (the “EEA”) or from a region with a legal restriction on international data transfers and will transfer your Personal Data to countries outside of the EEA. If these transfers are to a country for which the EU Commission has not issued an adequacy decision, SAP uses the EU standard contractual clauses to contractually require that your Personal Data receives a level of data protection consistent with the EEA. You can obtain a copy (redacted to remove commercial or irrelevant) of such standard contractual clauses by sending a request to [privacy@\[sap.com\]](mailto:privacy@[sap.com]). You can also obtain more information from the European Commission on the international dimension of data protection here: [European Commission](#).

### **What are your data protection rights?**

You can request from SAP: access at any time to information about which Personal Data SAP processes about you and the correction or deletion of such Personal Data.

If SAP uses your Personal Data based on your consent or to perform a contract with you, you can further request from SAP a copy of the Personal Data that you have provided to SAP. In this case, please contact the email address below and specify the information or processing activities to which your request relates, the format in which you would like to receive this information, and whether the Personal Data should be sent to you or another recipient. SAP will carefully consider your request and discuss with you how it can best fulfill it.

Furthermore, you can request from SAP that SAP restricts your Personal Data from any further processing in any of the following events: (i) you state that the Personal Data SAP has about you is incorrect, subject to the time SAP requires to check the accuracy of the relevant Personal Data, (ii) there is no legal basis for SAP processing your Personal Data and you demand that SAP restricts your Personal Data from further processing, (iii) SAP no longer requires your Personal Data but you state that you require SAP to retain such data in order to claim or exercise legal rights or to defend against third party claims, or (iv) in case you object to the processing of your Personal Data by SAP based on SAP’s legitimate interest (as further set out below), subject to the time required for SAP to determine whether it has a prevailing interest or legal obligation in processing your 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. Kindly note further that if you request that SAP deletes your Personal Data, you will not be able to continue to use any SAP service that requires SAP’s use of your Personal Data.

### **How can you exercise your data protection rights?**

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

### **How will SAP verify requests to exercise data protection rights?**

SAP will take steps to ensure that 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, or are not otherwise required by local law.

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 lodge a complaint with the data protection authority of the EEA country where you live or with the data protection authority of the country or state where SAP has its registered seat.

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

**Children.** In general, this SAP Alumni Network (<https://sap-alumni.com>) 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 and use this SAP Alumni Network (<https://sap-alumni.com>).

## B. Processing based on a statutory permission

### **Why does SAP need to use your Personal Data and on what legal basis is SAP using it?**

SAP can use your Personal Data based on its legitimate interest (Article 6 para. 1 lit. f GDPR or the equivalent article under other national laws, when applicable) as follows:

- **Questionnaires and survey.** SAP could invite you to participate in questionnaires and surveys. These questionnaires and surveys will be generally designed in a way that they can be answered without any data that can be used to identify you. If you nonetheless enter such data in a questionnaire or survey, SAP will use this Personal Data to improve its offerings.
- **Personalized mailings.** If you opt-in to receive marketing communications such as newsletters from SAP Alumni Network, SAP will collect and store details of how you interact with such mail communications to help create, develop, operate, deliver and improve our mail communications with you. This information is aggregated and used to help SAP provide more useful information and to understand what is of most interest.
- **Use for the Marketplace Job Board.** SAP only shares information about vacant job positions on the Alumni Portal as part of an integration of a job feed of SAP SuccessFactors customers. SAP does not act as a recruitment agency and is not responsible for any employment-related decisions made on the basis of the job information published on the Alumni Portal. SAP is not responsible for the content posted and, does not check the accuracy of the content or its relevance under criminal and civil law.

### **Right to object**

You can at any time object to SAP's use of your Personal Data as set forth in this section by sending an email to [alumni.relations@\[sap\].com](mailto:alumni.relations@[sap].com). In this case, 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 information, which override your interest in objecting, or if SAP requires the information for the establishment, exercise or defense of legal claims.

## C. Processing Based on Consent

In the following cases SAP will only use your Personal Data as further detailed below after you have granted your prior consent into the relevant processing operations.

**Creating user profiles.** As an essential element of the SAP Alumni Network, you are required to register and create a user profile. User profiles provide the option to display personal information about you to other users, including but not limited to your name, photo, social media accounts, email address, telephone number, personal interests, skills, and basic information about your company.

Kindly note that without your consent for SAP Alumni Network to create such user profiles SAP will not be in a position to offer you the services described above of SAP Alumni Network.

Within the SAP Alumni Network beyond the mere provision of access your profile is used to personalize interaction with you:

- Interaction with other members of SAP Alumni Network like messaging
- Communication from SAP to you like newsletters, invitations for Alumni events, information about job opportunities or consulting work
- Foster communication between the Alumni community

To the greatest extent supported by the SAP Alumni Network you can use the functionality of the SAP Alumni Network to determine which information you want to share.

“**Social login**” is an addition to the conventional login option on SAP Alumni Network. Instead of using your SAP Alumni credentials, you select your favorite network (LinkedIn, Google) with which you would like to identify yourself to SAP Alumni.

When you click on one of the buttons, a window of the selected network opens to ask if you consent to SAP Alumni Network accessing your personal profile. Depending on the network, you are also told which information in your profile we will have access to as soon as you provide your consent.

#### D. Cookies and similar tools

Information gathered by cookies or similar technologies, and any use of such information, is further described in SAP’s Cookie Statement. You can exercise your cookie preferences as outlined in SAP’s Cookie Statement by visiting the [Cookie Policy](#) link in the bottom footer of the homepage.

#### E. Additional Country and Regional Specific Provisions

Where SAP is subject to certain privacy requirements in the Philippines, the following also applies:

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

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

alumni.relations[[@](mailto:alumni.relations@sap.com)]sap.com

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.

Where SAP is subject to certain privacy requirements in the United States, the following also applies:

**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 SAP Alumni Network (<https://sap-alumni.com>) 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.

Where SAP is subject to certain privacy requirements in the United States in the State of California, the following also applies:

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 non-discriminatory treatment for exercise of any of your data protection rights; and
- in case of request from SAP for 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 and will not sell your Personal Data. 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 [alumni.relations@\[ \]sap.com](mailto:alumni.relations@[ ]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.

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: [Attn.] Tina Bhatia, DPO (Singapore)

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

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

Contact: +65 6664 6868