Functions and Features in Data Protection in SAP S/4HANA for GDPR and CCPA

SEC203
Speakers

Las Vegas  
September 24–27, 2019  
Vandana Mansharamani

Barcelona  
October 8-10, 2019  
Volker Lehnert

Bangalore  
November 13-15, 2019  
Thorsten Bruckmeier
Take the session survey.

We want to hear from you!

Complete the session evaluation for this session SEC203 on the SAP TechEd mobile app.

Download the app from iPhone App Store or Google Play.
Disclaimer

The information in this presentation is confidential and proprietary to SAP and may not be disclosed without the permission of SAP. Except for your obligation to protect confidential information, this presentation is not subject to your license agreement or any other service or subscription agreement with SAP. SAP has no obligation to pursue any course of business outlined in this presentation or any related document, or to develop or release any functionality mentioned therein.

This presentation, or any related document and SAP’s strategy and possible future developments, products and or platforms directions and functionality are all subject to change and may be changed by SAP at any time for any reason without notice. The information in this presentation is not a commitment, promise or legal obligation to deliver any material, code or functionality. This presentation is provided without a warranty of any kind, either express or implied, including but not limited to, the implied warranties of merchantability, fitness for a particular purpose, or non-infringement. This presentation is for informational purposes and may not be incorporated into a contract. SAP assumes no responsibility for errors or omissions in this presentation, except if such damages were caused by SAP’s intentional or gross negligence.

All forward-looking statements are subject to various risks and uncertainties that could cause actual results to differ materially from expectations. Readers are cautioned not to place undue reliance on these forward-looking statements, which speak only as of their dates, and they should not be relied upon in making purchasing decisions.
Personal disclaimer

SAP does not provide legal advice.

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 with regard to the organizational aspects.

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

To help the audience understand the shown approach, in-context information is provided without claiming completeness or correctness.
Agenda

EU GDPR – Presenter’s view
Processing of personal data
  ▪ Legal basis
  ▪ Considerations
Rights of the data subject
  ▪ Legal basis
  ▪ Considerations
Security safeguards
  ▪ Considerations
Purpose differentiation
  ▪ Line organizational attributes
  ▪ Process organizational attributes
California Consumer Privacy Act (CCPA) – Presenter’s View
California Consumer Privacy Act (CCPA) – Consumer Rights
SAP Business Suite and SAP S/4HANA – Some technical features
  ▪ Simplified blocking and deletion
  ▪ Information retrieval framework
  ▪ Read Access Logging
SAP Cloud Platform – Data Retention Manager
  ▪ SAP Cloud Platform Data Retention Manager
EU GDPR – Presenter’s view
Data protection is simple!

Processing of personal data is forbidden …
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)
• The data subject has given his/her unambiguous consent
Personal data

Definition

‘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.

Article 4(1) European Union General Data Protection Regulation (EU GDPR)
Personal data

Definition

Information that identifies individuals in terms of making them directly addressable or contactable:
- Name
- Postal address
- Telephone number
- Email address, etc.

Information that contains identifiers that enable someone indirectly to connect to an individual:
- National identifiers
- IP addresses
- MAC addresses
- License-plate numbers
- Membership numbers, etc.
Personal data
Examples of personal data in SAP Business Suite and SAP S/4HANA

SAP Business Partner

Name
BP-ID
Address

Contract

Unique, assignable contract ID

Order

Sold-to party

Delivery

Delivery address

Invoice

Invoice address

Payment

Bank account or credit card information
Data subject, data controller, data processor

Definitions

Data subject:
- A natural person (Austria: legal persons as well) to whom the personal data relates

Data controller:
- A natural or legal person, public authority, agency or any other body that determines purposes and means for processing personal data – other than persons who use data for personal purposes

Data processor:
- A natural or legal person, public authority, agency or any other body that processes personal data on behalf of and in accordance with the instructions of the controller

E.g.: Employee – D0XX234
E.g.: ABC Corp. Ltd.
E.g.: SAP Travel on Demand
Processing of personal data
Processing of personal data
Legal basis

- Consent
- Contract
- Legal Obligation
- Protect Vital Interest
- Public Interest
- Legitimate Interest

Legal grounds for processing personal data
### Processing of personal data
#### Considerations

<table>
<thead>
<tr>
<th>Content</th>
<th>Possible technical feature?</th>
</tr>
</thead>
</table>
| Consent                                                                 | Where processing is based on the data subject's consent, the controller should be able to demonstrate that the data subject has given consent to the processing operation. (Recital 42, sentence 1, EU GDPR) | Proof of consent is basically an organizational measure, however, the impact on data processing in an SAP ERP system needs to be considered. Each platform will offer a local consent feature if required for the specific purpose. For example:  
  ▪ Marketing Permissions in SAP CRM  
  ▪ Consent Administration in SAP S/4HANA  
  ▪ SAP Cloud Platform Consent Repository  
  ▪ SAP Customer Consent offers an enterprise consent solution to centralize consent management. |
| Contract                                                                | Processing should be lawful where it is necessary in the context of a contract or the intention to enter into a contract. (Recital 44, EU GDPR)                                                                                 | The proof of a contract is basically an organizational measure, however, an SAP ERP system handles data documenting contracts:  
  ▪ The existence of a contract itself is documented by corresponding documents and postings  
  ▪ As a supporting solution for documentation, SAP GRC might be considered |
| Legal Obligation                                                       | ERP-based examples: Tax reporting, income tax reporting, reporting for social insurance                                                                                                                                       | These are all organizational measures  
  ▪ As a supporting solution for documentation, SAP GRC might be considered |
| Protect Vital Interest                                                 | The processing of personal data should also be regarded to be lawful where it is necessary to protect an interest which is essential for the life of the data subject or that of another natural person. (Recital 46, sentence 1, EU GDPR) |                                                                                                                                  |
| Public Interest                                                        | Where processing is … necessary for the performance of a task carried out in the public interest or in the exercise of official authority, the processing should have a basis in Union or Member State law. (Recital 45, sentence 1, EU GDPR) |                                                                                                                                  |
| Legitimate Interest                                                    | Proving a legitimate interest is subject to a careful legal consideration whether "fundamental rights and freedoms of the data subject" are not overriding such an interest. (Recital 47, EU GDPR)                                           |                                                                                                                                  |
Rights of the data subject
Rights of the data subject

Legal basis

- Automated Decision
- Portability
- Erasure
- Prior Information
- Restriction
- Accuracy
- Information Access
# Rights of the data subject

## Considerations

<table>
<thead>
<tr>
<th>Content</th>
<th>Possible technical feature?</th>
</tr>
</thead>
</table>
| **Information to be provided** | 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.  
• SAP's information retrieval framework |
| **Information Access** | The data subject’s right to get information on the data undergoing processing concerning them. | All personal data in SAP Business Suite is available for reporting in application-specific reports. Central reporting is currently possible using AIS and the new transaction SE16SL.  
• SAP’s information retrieval framework |
| **Accuracy** | Personal data has to be true and to be corrected (latest after request). | Simple standard functionality (Change Functionality in Master Data and Documents) |
| **Erasure: Deletion/Blocking** | 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. | SAP introduced the concept of simplified blocking and deletion.  
• SAP Information Lifecycle Management  
• Data Controller Rule Framework  
• End-of-purpose checks  
• Blocking indicators |
| **Portability** | The right of the data subject to receive his personal data in a structured, commonly used, and machine-readable format. | All tools named under Information Access provide download functionality. The challenges here are missing international standards and the complexity of personal data in business. |
| **Restriction of Processing** | The data subject has the right to obtain from the controller restriction of processing in certain cases. | Subject to the blocking and deletion functionality |
| **Automated Decisions** | The data subject has the right that any automated decision can become subject to manual interference. | Any features providing such capabilities ensure that such decisions can get overruled manually. |
Security safeguards
Security safeguards

**TOM – Technical organizational measures**

- **Data Separation**
- **Physical Access Control**
- **Authentication**
- **Authorizations**
- **Job Control**
- **Availability Control**
- **Transmission Control**
- **Change Control**
- **Disclosure Control**

---

© 2019 SAP SE or an SAP affiliate company. All rights reserved. | PUBLIC
## Security safeguards
### Considerations

<table>
<thead>
<tr>
<th>Content</th>
<th>Possible technical feature?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical Access Control</td>
<td>Prevent unauthorized persons from gaining access to data processing systems with which personal data is processed or used</td>
</tr>
<tr>
<td>Authentication</td>
<td>Secure procedures to enable system access based on personal authentication</td>
</tr>
<tr>
<td>Authorizations</td>
<td>Procedures allowing the differentiation of which data can be accessed and in which mode</td>
</tr>
<tr>
<td>Disclosure Control</td>
<td>Ability to document all access to personal data</td>
</tr>
<tr>
<td>Job Control</td>
<td>Data Controller has to ensure that the data processor is following his instructions and guidelines. This organizational task has some technical aspects like system audit</td>
</tr>
<tr>
<td>Data Separation</td>
<td>Personal data collected for a specified purpose must be separated from personal data collected for other purposes</td>
</tr>
</tbody>
</table>
Purpose differentiation
Using organizational structures
Every operation should be based on a specific purpose and it should be possible to prove and establish this association in the system. A purpose could be the sale of a product or providing a service, for example.

It should be possible to prove:
- The purpose for processing data (the why)
- The entity responsible for processing data (the who)

To achieve this, data should be linked to attributes reflecting:
- The purpose (the why)
- Line organizational attributes and process organizational attributes (the why and who)
Purpose differentiation
An example of a group of companies
A data controller is mentioned in Article 4(7) EU GDPR as the entity that decides the purpose of processing data.

Any legal entity in the organizational structure (common example: Company code) could take the logical role of a data controller.

A data controller should be uniquely identifiable for a certain purpose of processing.

SAP provides a Data Controller Rule Framework to address certain aspects of data protection like data erasure. Creating a well-balanced organizational structure would also allow the creation of distinct retention rules for blocking and deleting data.
Purpose differentiation
LOA model for the given example (a simple view)
Purpose differentiation
Process organizational attributes

Attributes reflecting the process flow (process organization) are called *process organizational attributes* (POA).
Purpose differentiation
Example: Real Peppermint

Example: A group of companies with two businesses in two countries (Germany and North America):
1. Sales of peppermint tea
2. Sales of cough medicine

Real Peppermint AG
Company Code 1000 has 2 Sales organizations
• Sales Org: 1000 – Sells cough medicine
• Sales Org: 1100 – Sells peppermint tea

Real Peppermint Americas
Company Code 2000 has 1 Sales organization
• Sales Org: 2000 – Sells cough medicine and peppermint tea

Different sales order types could be used to demarcate purpose of sales orders.
### Purpose differentiation

Example: Bringing LOA and POA together

<table>
<thead>
<tr>
<th>Purpose</th>
<th>Business Partner</th>
<th>Sales Order</th>
<th>Delivery</th>
<th>Billing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cough medicine sales, Real Peppermint AG</td>
<td>Comp. Code 1000 BP_TYPE ‘1’</td>
<td>Sales Org. 1000 Sales Order Type “1” Sales Org. 1000</td>
<td>Delivery Type “1” Comp. Code 1000 Billing type “1”</td>
<td></td>
</tr>
<tr>
<td>Peppermint tea sales, Real Peppermint AG</td>
<td>Comp. Code 1000 BP_TYPE ‘1’</td>
<td>Sales Org. 1100 Sales Order Type “1” Sales Org. 1100</td>
<td>Delivery Type “1” Comp. Code 1000 Billing type “1”</td>
<td></td>
</tr>
</tbody>
</table>

Just as an example: The two companies (company codes 1000 and 2000) could do it differently, but in the end still maintain distinct purposes using line organizational attributes and process organizational attributes.
California Consumer Privacy Act (CCPA)

– Presenter’s view
Personal Information (PI)

Definition

Personal information means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information includes, but is not limited to, the following:

(A) Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.

(B) Any categories of personal information described in subdivision (e) of California Civil code sec 1798.80 Characteristics of protected classifications under California or federal law.

(C) Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

(D) Biometric information.

(E) Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement.

(G) Geolocation data.

(H) Audio, electronic, visual, thermal, olfactory, or similar information.

(I) Professional or employment-related information.

(J) Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).

(K) Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

(2) “Personal information” does not include publicly available information. For these purposes, “publicly available” means information that is lawfully made available from federal, state, or local government records, if any conditions associated with such information. “Publicly available” does not mean biometric information collected by a business about a consumer without the consumer’s knowledge. Information is not “publicly available” if that data is used for a purpose that is not compatible with the purpose for which the data is maintained and made available in the government records or for which it is publicly maintained. “Publicly available” does not include consumer information that is deidentified or aggregate consumer information.
Business Definitions

A legal entity (company, partnership…) that operates for profit, collects PI, determines (alone or jointly with others) purposes and means of processing of consumers PI, that does business in CA and

- has an annual gross revenue > 25 million dollars OR
- deals with PI of 50,000 or more consumers, households or devices OR
- derives 50% of its revenue by selling PI

E.g.: Employee – D0XX234

E.g.: ABC Corp. Ltd.

E.g.: SAP Travel on Demand
“Consumer” means a natural person who is a California resident, as defined in Section 17014 of Title 18 of the California Code of Regulations, as that section read on September 1, 2017, however identified, including by any unique identifier.
“Service provider” means a sole proprietorship, partnership, limited liability company, corporation, association, or other legal entity that is organized or operated for the profit or financial benefit of its shareholders or other owners, that processes information on behalf of a business and to which the business discloses a consumer’s personal information for a business purpose pursuant to a written contract, provided that the contract prohibits the entity receiving the information from retaining, using, or disclosing the personal information for any purpose other than for the specific purpose of performing the services specified in the contract for the business, or as otherwise permitted by this title, including retaining, using, or disclosing the personal information for a commercial purpose other than providing the services specified in the contract with the business.
California Consumer Privacy Act (CCPA) – Consumer Rights
Right 1: Right to information

1798.100 (a) Tell me what information you collected from me
- Categories of personal information
- Specific pieces of personal information

1798.100 (b) Business to provide advance information
- Categories of personal information
- For what purpose

1798.110 (a) Tell me about PI collected from other sources
- Categories of personal information collected
- Categories of sources
- Purpose for which it is collected or sold
- Categories of third parties with whom the business shares PI
- Specific pieces of PI collected about consumer.
Right 2: Right to request deletion

1798.105 (a) Delete my personal information

1798.100 (b) Business to delete data and direct service providers to do so!

Unless:
- There are reasons not to (as stated in the act)
  some examples: - comply with legal obligations,
  - complete a transaction
Right 3: Right to request information about sale or disclosure of PI

1798.115(a) A consumer shall have the right to request that a business that sells consumer’s PI, or that discloses it for a business purpose, disclose the following to the consumer:

- Categories of personal information collected about the consumer
- Categories of PI the business sold and Categories of third parties to whom PI was sold, by category/ies of PI for each third party.
- Categories of PI disclosed by a business for business purpose.

Sale ≠ Disclose
Last 12 months
2 separate lists
Right 4: Right to opt-out of sale of PI

1798.120(a) A consumer shall have the right to opt–out of sale of their Personal information.

1798.120(d) Opt-in needed before sale of information of consumers < 16 yrs. of age.

- ‘Do not sell my personal information’ link
- Next 12 months at least
- Ask again
SAP Business Suite and SAP S/4HANA

Some technical features – Simplified Blocking and Deletion
Requirement:
Personal data that is 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.
Simplified Blocking and Deletion
Examples of personal data

Contract of employment
Working student
(April 2011 – March 2014)

Communication
+49 610 9607207
Portal account: CarlaJoh

Contract for work:
Targeted marketing with Beacons and Geofencing
(December 2015)

Carla Johnson
Oaktree Road 1
39761 Berlin

Ordered items
• iPhone + Service contract (March 2015)
• The Divine Comedy – Alighieri, D: (January 2016)

Payment condition
Allcreditbank
IBAN: DE12500903170648489890
Type of business relationship
Processing purposes?

- Obviously there are different business relationships with Carla Johnson that cause different residence and retention periods
- The different business relationships also mean that there are different processing purposes to consider
- In many cases, the processing purpose of master data is dependent on other data processing purposes
## Simplified blocking and deletion

### Different retention times

<table>
<thead>
<tr>
<th>Processing purpose</th>
<th>Processing</th>
<th>Blocking</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Master data</strong></td>
<td>Dependent on other processing purposes</td>
<td>With related data</td>
</tr>
<tr>
<td><strong>Payment data</strong></td>
<td>Dependent on other processing purposes</td>
<td>With related data</td>
</tr>
<tr>
<td><strong>Communication data</strong></td>
<td>Dependent on other processing purposes</td>
<td>With related data</td>
</tr>
<tr>
<td><strong>Marketing</strong></td>
<td>Marketing</td>
<td>Until revocation of consent or missing renewal after x years</td>
</tr>
<tr>
<td><strong>Sales contract data iPhone &amp; service</strong></td>
<td>Processing sales contract</td>
<td>Up to end of service contract rights</td>
</tr>
<tr>
<td><strong>Sales contract data “The Divine Comedy”</strong></td>
<td>Processing sales contract</td>
<td>During processing of sales contract, if necessary, reporting purposes</td>
</tr>
<tr>
<td><strong>Data contract for work</strong></td>
<td>Processing contract for work</td>
<td>During processing of contract for work, if necessary, reporting purposes</td>
</tr>
<tr>
<td><strong>Data contract of employment</strong></td>
<td>Processing employment relationship</td>
<td>During employment relationship and processing of termination</td>
</tr>
</tbody>
</table>
SAP Business Suite and SAP S/4HANA
Some technical features – Information Retrieval Framework
Information retrieval framework
Collecting personal data

Personal data are stored:
- In the **database**
- In **fields** of **tables**
- **Connected** via fields

Some tables **belong together** (for example: address data is stored in multiple tables)
Information retrieval framework

Overview

1. Based on **SAP ILM objects**
   Same SAP ILM objects used for “blocking & deletion”, representing business objects
Information retrieval framework
Overview

1. Based on **SAP ILM objects**
   Same SAP ILM objects used for “blocking & deletion”, representing business objects

2. Automated detection of **links between tables** in SAP ILM objects
Information retrieval framework
Overview

1. Based on **SAP ILM objects**
   - Same SAP ILM objects used for “blocking & deletion”, representing business objects

2. Automated detection of **links between tables** in SAP ILM objects

3. Logical grouping via **Table Clusters** (tables that belong together logically, such as address, purchaser order, or supplier data)
Information retrieval framework
Overview

1. Based on **SAP ILM objects**
   Same SAP ILM objects used for “blocking & deletion”, representing business objects

2. Automated detection of **links between tables** in SAP ILM objects

3. Logical grouping via **Table Clusters** (tables that belong together logically, such as address, purchaser order, or supplier data)

4. Data retrieval using **links between the clusters**
Information retrieval framework
Overview

1. Start in **cluster** “Supplier” for a supplier/business partner

2. Read **all data** from tables in “Supplier” **cluster**

3. Read **all data** from linked “Purchase Order” **cluster(s)** based on link between them (“Supplier” → Table with supplier field in “PO” cluster)
Information retrieval framework

Overview

- If the data subject requests information about their personal data, enter the business partner number and language of the data subject using the Start Data Collection application
- All personal data for the business partner is collected for every configured purpose
- Data collection results:
  - Are converted into an understandable output
  - Are displayed in a hierarchical order
  - Can be viewed and downloaded
Read Access Logging

Read Access Logging (RAL) allows:

- Compliance with data privacy regulations
- Compliance with industry standards (such as Basel suite for banking industry)
- Monitoring of access to classified data or other sensitive data
- Monitoring of user actions on a need-to-know basis only
Read Access Logging

Scope of RAL focuses on:
- Valid (authenticated) users
- Running authorized applications

If these users misuse applications to gain information (“insider knowledge”), this can be checked using the read access logs:
- Logging only the data that the user saw
- Identifying users who committed a violation after it occurred (“you will be caught”)

RAL is not intended for:
- Preventing hacking
- Preventing illegal access
The SAP sample configuration is delivered taking into consideration sensitive personal data (Article 9(1) EU GDPR).
Read Access Logging

The following features are available:

- Ability to enable and configure read access logging
- Ability to view logs
- Pre-delivered RAL configuration
- Ability to archive and delete generated logs using SAP Information Lifecycle Management (SAP ILM)
SAP Cloud Platform
Data Retention Manager
SAP Cloud Platform Data Retention Manager

- Enables applications in SAP Cloud Platform to fulfil the data subject’s rights in accordance with the EU GDPR guidelines:
  - Right to be forgotten
  - Maintain purposes/legal ground with personal data usage
- Maintains residence and retention rules
- Deletes data subjects
Continue your SAP TechEd 2019 Learning Experience

Join the digital SAP TechEd Learning Room 2019 in SAP Learning Hub

- Access SAP TechEd Learning Journeys
- Discover related learning content
- Watch webinars of SAP TechEd lectures
- Learn about SAP’s latest innovations with openSAP
- Collaborate with SAP experts
- Self-test your knowledge
- Earn a SAP TechEd knowledge badge
Engage with the **SAP TechEd Community**

Access replays and continue your SAP TechEd discussion after the event within the **SAP Community**

**Access replays**
- Keynotes
- Live interviews
- Select lecture sessions
  [http://sapteched.com/online](http://sapteched.com/online)

**Continue the conversation**
- Read and reply to blog posts
- Ask questions
- Join discussions
  [sap.com/community](http://sap.com/community)

**Check out the latest blogs**
- See all SAP TechEd blog posts
- Learn from peers and experts
  [SAP TechEd blog posts](http://sap.com/community)
Related SAP TechEd Learning Journeys

- SEC2 – Comply with Legal Regulations and Securely Govern Your Intelligent Enterprise Landscape

Related SAP TechEd sessions

- SEC205 – A Holistic Approach to GDPR and CCPA Helps Purpose-Driven Data Protection
- SEC300 – SAP Cloud Platform Data Retention Manager for Data
- SEC301 – Blocking and Deletion of Personal Data
- LT111 – How an Information Retrieval Framework by SAP Supports Compliance with GDPR
- LT118 – Proving Accountability Has a Lot To Do with Organized Note-Taking

Public SAP Web sites

- SAP Community: www.sap.com/community
- SAP products: www.sap.com/products
Further information

GDPR is here – get compliant!

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

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

GDPR and SAP
Data Privacy with SAP Business Suite and SAP S/4HANA
Written by: Lehnert, Luther, Christoph, Pluder, Fernandes
ISBN 978-1-4932-1713-7
Thanks for attending this session.

Feedback
Please complete your session evaluation for **SEC203**.

Contact for further topic inquiries

**Vandana Mansharamani**  
Product Manager – SAP S/4HANA Cloud Data Protection and Security  
Vandana.mansharamani@sap.com

**Volker Lehnert**  
Senior Director Data Protection SAP S/4HANA  
Volker.lehnert@sap.com