



# **EU GDPR:** *European Union General Data Privacy Regulation*

**Panel @ HERUG 2018**

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SAP**

- **EU GDPR: What is it and what impact does it have**
- **Compliance to GDPR in HCM at Freie Universitaet Berlin**
- **SAP support for GDPR in SLcM**
- **Licenses**
- **Discussion**

- **EU GDPR: What is it and what impact does it have**
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# What is EU GDPR?

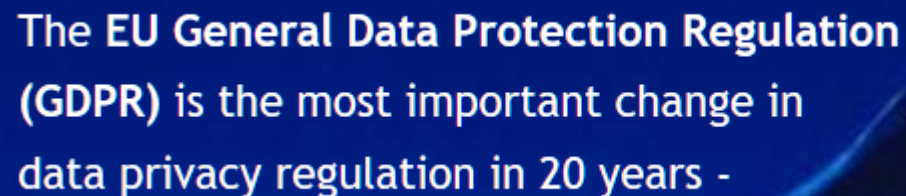
EU GDPR stands for „*European Union General Data Privacy Regulation*“

The regulation intends to strengthen ***individual data and privacy protection*** for persons residing within the EU, becoming effective on May 25, 2018

## Scope of GDPR:

11 Chapters  
99 Articles  
269 Pages

[Click here for a summary of Articles Contained in the GDPR](https://www.eugdpr.org/article-summaries.html)  
(or go to: <https://www.eugdpr.org/article-summaries.html>)



The EU General Data Protection Regulation (GDPR) is the most important change in data privacy regulation in 20 years -

# Why care for data privacy?

- Data privacy has always been my top priority
- Facebook did show us that bad things can happen when data privacy is not honored
- ✓ ○ GDPR stipulates a fine for data privacy violations of up to 4% of the total worldwide annual turnover of the preceding financial year (§83)

# What are the key issues?

## 1. Expanded Scope

Territorial Scope,

## 2. Formalised Recordkeeping Requirements

Privacy Impact  
Assessments, Data  
Processing Register,  
Data Breach Register,

## 3. New Rights

The Right to Data  
Portability, the Right to  
Erasure, and the Right  
to Object

SHEARMAN & STERLING<sup>LLP</sup>  
“The EU General Data Protection Regulation”

## Increased Territorial Scope (extra-territorial applicability)

The GDPR not only applies to organizations located within the EU but it will also apply to organizations located outside of the EU if they offer goods or services to, or monitor the behavior of, EU data subjects ... Companies, who have no establishment in the EU, but are active on the European market, are obliged to appoint a representative within the EU.

### 1. Expanded Scope

Territorial Scope,

„GDPR Key Changes“ on [eugdpr.org](http://eugdpr.org)  
plus DSK „Kurzpapier Nr. 7“

# Data protection impact

Datenverarbeitung im Auftrag

**Schutzbedarfsanalyse**

Einschätzung der Vertraulichkeit

\*\*\* Beeinträchtigung des informationellen Selbstbestimmungsrechts \*\*\* Wenn Daten nicht vertraulich behandelt oder missbraucht werden, ist die Beeinträchtigung für den Betroffenen wie folgt einzuschätzen:

- Tolerable Beeinträchtigung des informationellen Selbstbestimmungsrechts / Geringfügige Auswirkung auf die gesellschaftliche Stellung oder die wirtschaftlichen Verhältnisse
- Erhebliche Beeinträchtigung des informationellen Selbstbestimmungsrechts / Erhebliche Auswirkungen auf die gesellschaftliche Stellung oder die wirtschaftlichen Verhältnisse
- Gravierende Beeinträchtigung des informationellen Selbstbestimmungsrechts / Gesellschaftlicher oder

## Privacy Impact Assessment

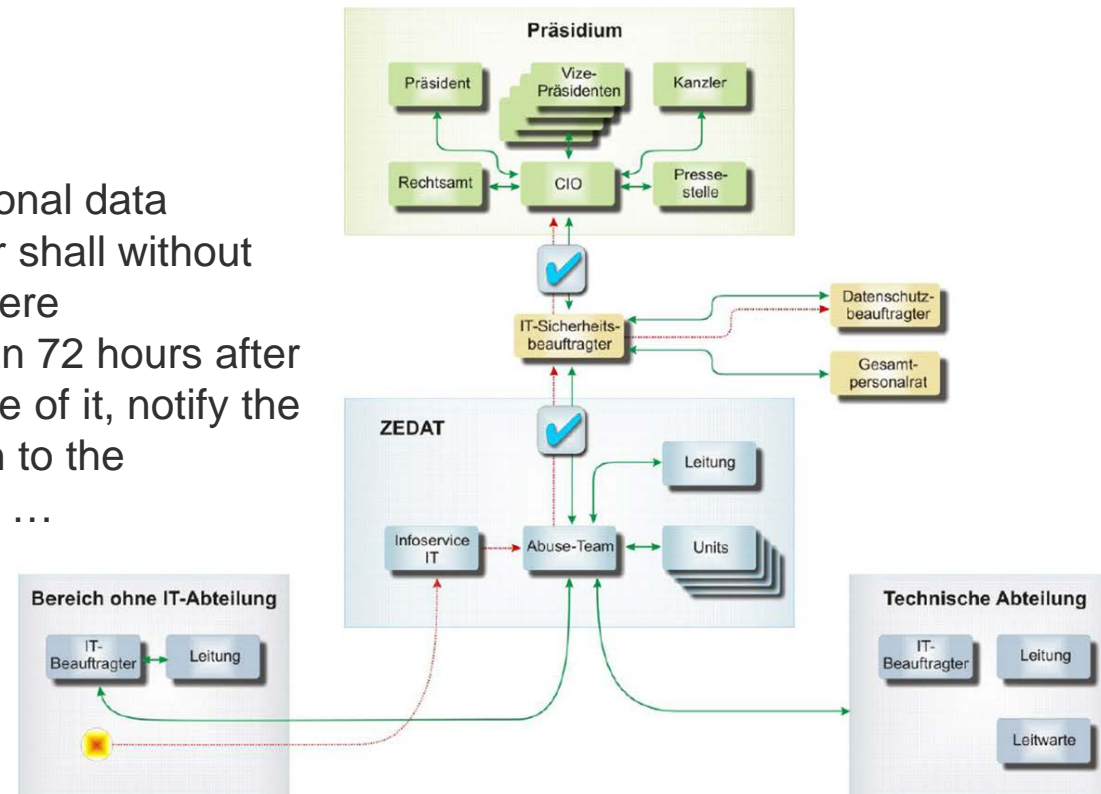
## Data breach emergency communication plan:

## 2. Formalised Recordkeeping Requirements

traulich sind.

### Article 33

In the case of a personal data breach, the controller shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority ...



Privacy Impact Assessments, Data Processing Register, Data Breach Register,



## Services für den Personalbereich

### Personalabrechnung

Abt. I, Verfahrensverantwortlich: Fr. Adolphs

Die Freie Universität rechnet monatlich für fast 7000 Beamte, Angestellte und studentische Mitarbeiter die Entgelte ab. Die hierfür benötigte IT-Umgebung wird vom Bereich eAS bereitgestellt und gepflegt.

- Service Catalog with general information about the services
- Specifics of each Service
  - Purpose of Service
  - Kind of Data processed
  - etc
- Data stored on Data Subject (incl. list in portable format)

## Personalabrechnung

<b>Institution:</b>	<b>Abt. I, Verfahrensverantwortlich: Fr. Adolphs</b> Dieser Service ist Teil des IT-Verfahrens Personalabrechnung
<b>Ansprechpartner:</b>	eAS, Serviceverantwortlich: Fr. Buchholz (Gründer Personalssysteme)
<b>Homepage:</b>	<ul style="list-style-type: none"><li>• <a href="#">Bei Problemen oder wenn Sie einen Fehler melden, klicken Sie bitte hier für Support (zuständig)</a></li><li>• <a href="#">Weitere Links zur Personalabrechnung finden Sie auf dieser Seite</a></li></ul>

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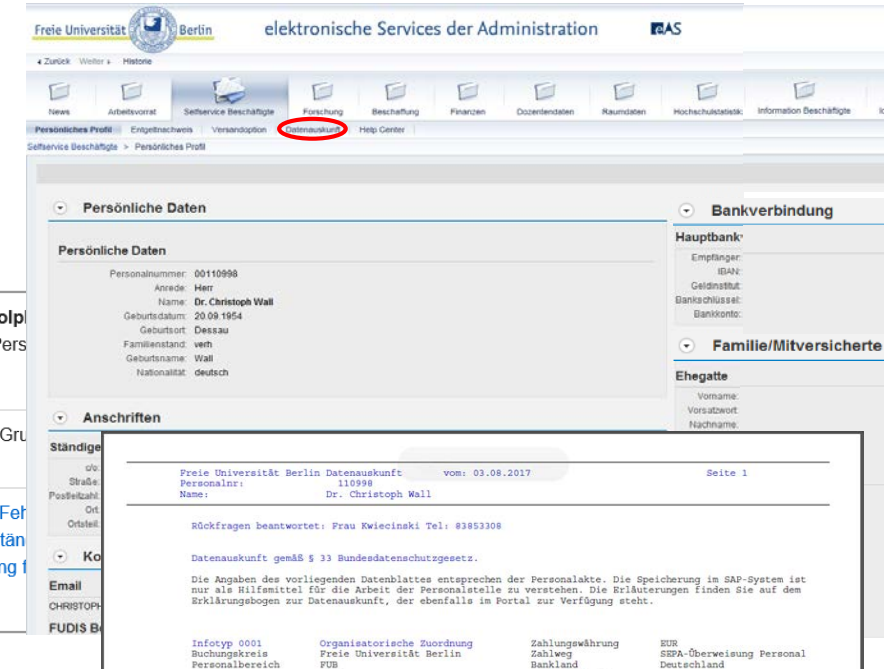
Um die hohen Qualitätsanforderungen an Korrektheit, Genauigkeit und Pünktlichkeit der Abrechnung gewährleisten zu können, betreut das eAS Team die Abrechnungsprogramme und erweitert diese regelmäßig um eventuelle tarifliche oder gesetzliche Änderungen.

Im Ergebnis werden nicht nur pünktlich die korrekt berechneten Beträge auf die Mitarbeiter-Konten überwiesen, sondern auch alle externen Empfänger wie z. B. Krankenkassen und Sozialversicherung bedient.

Die persönlichen Entgeltnachweise kann sich jeder im elsa (elektronische Services der Administration) Portal aufrufen ([einmalige Freischaltung im Self-Service notwendig](#)).

### Komponenten der eAS Service-Leistung für die Personalabrechnung

Betreuung der Personalabrechnung

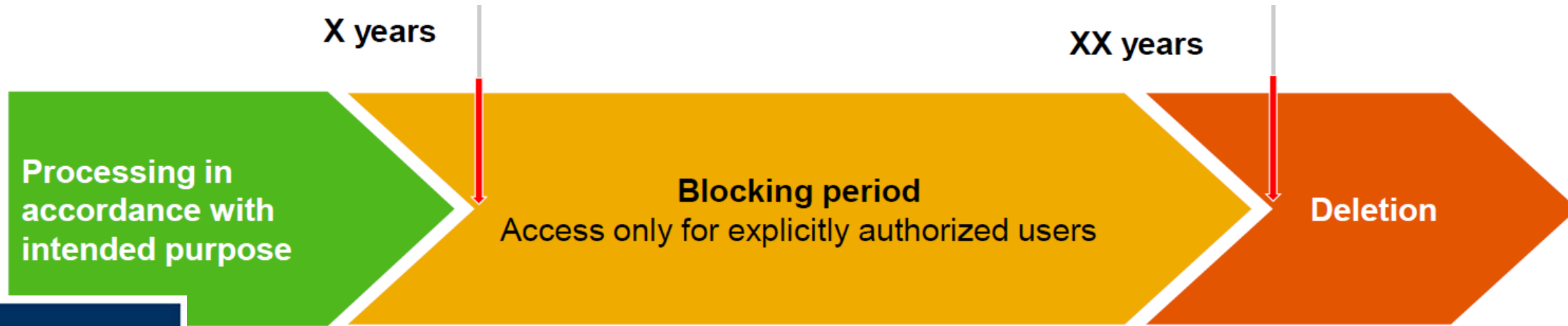


The screenshot shows the 'elektronische Services der Administration' portal. The 'Persönliche Daten' section is visible, containing fields for Personalnummer, Anrede, Name, Geburtsdatum, Geburtsort, Familienstand, Geburtsname, and Nationalität. Below this, the 'Anschriften' section shows the user's address and contact information. A 'Datenauskunft' form is also visible, with a red circle around the 'Datenauskunft' link in the top navigation bar. The form includes a 'Ständige' section with address details and a 'Ko' section with contact information. A red circle also highlights the 'Datenauskunft gemäß § 33 Bundesdatenschutzgesetz' link in the 'LINKS ZUM THEMA' section.

### LINKS ZUM THEMA

- > Aufruf Entgeltnachweis im elsa-Portal
- > Hilfe und Support
- > Handbuch und Dokumentation
- > Servicekarte Personalabrechnung (SLA)
- > Verfahrensbeschreibung (mit zusätzlichem Login)
- > **Datenauskunft gemäß § 33 Bundesdatenschutzgesetz**

# Data Blocking and Deletion



## 3. New Rights . . .

... and old requirements

The Right to Data Portability, the Right to Erasure, and the Right to Object

- EU GDPR: What is it and what impact does it have
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- How to identify personal data in the SAP Systems



- How to provide access and portability



- How to organize the „Right to be forgotten“:



- Via blocking access to personal data still needed



- Via data erasure



- With ILM as a tool to extract or block personal data



## Repository Info System: Enhancement of Report RSCRDOMA

### Domain and Data Element

**Personnel data**

PERNR      PERSNO

Number  
of  
Tables

295

**Business Partners**

AD\_PERSNUM    BU\_PARTNER    PERSONID

67

**Project Data**

VERAK    AFNAM    PS\_VERNR    PS\_ASTNR

11

**User data**

UNAME    BNAME    USERNAME  
CHAR12    SYCHAR12    XUBNAME

1860

# HCM – Finding all Personal Data



## Generic Table and Value Search

Transaction /SE16S



**Personnel data**

String for personnel number

String for name

**Business Partners**

String for BU\_PARTNER Number

String for name

String for personnel number

**Project Data**

String for personnel number

String for name

**User data**

String for User ID



## 1. **ESS Information of actual Employee-Related Data**

Content of own HR-Infotypes for reference date

## 2. **Report RPLERDX0 Information of all Employee-Related Data**

Content of all HR-Infotypes and related Orgmanagement data for any personnel no. and all periods

## 3. **Information Retrieval Framework**

List of all personal data of the data subject specified, subdivided according to the purpose for which the data was collected

# HCM – Report RPLERDX0



**Employee Data**

- 01.11.2023 - 31.12.9999
- (0001) Organizational Assignment
- (0002) Personal Data
  - 29.11.1957 - 30.09.2003
  - 01.10.2003 - 31.10.2003
  - 01.11.2003 - 31.12.2005
    - Start Date - End Date: 01.11.2003 - 31.12.2005
    - Last name: Rot
    - First name: Roberta
    - Form-of-address key: Mrs
    - Gender: Female
    - Date of birth: 29.11.1957
    - Country of Birth: US
    - Birthplace: Cupertino
    - Nationality: German
    - Communication Lang.: German
    - Religion: Evangelical
    - Marital status: Div.
    - Marital status since: 01.11.2003
    - Number of children: 4
    - Date of birth: 29.11.1957
    - Year of birth: 1957
    - Month of Birth: 11
    - Date of birth: 29
    - Last name: ROT
    - First name: ROBERTA
    - Employee/app. name: ROT
    - Employee/app. name: ROBERTA
    - Employee/app. name: Rot
    - Employee/app. name: ROT ROBERTA
- (0003) Payroll Status
- (0005) Leave Entitlement
- (0006) Addresses

**Employee Data**

- Personnel Manager
- Organizational Data
  - ( 01.01.2001 - 31.12.9999 )
  - ( 06.05.2002 - 31.12.9999 )
  - ( 01.02.2007 - 31.12.9999 )
    - Position: Wiss.Mitarbeiter/in(Qualifst.) ( S 50021140 )
    - Percent: 100,00
    - Organizational unit: FB 21 - Bereich Biologie ( O 50210001 )
    - Job: Wiss.Mitarbeiter/in(Qualifst.) ( C 50000931 )
- Personnel Development







## Use

The Information Retrieval Framework (IRF) allows you to search for and retrieve all personal data of a specified data subject. The search results are displayed in a comprehensive and structured list containing all personal data of the data subject specified, subdivided according to the purpose for which the data was collected and processed.

### Note

The Information Retrieval Framework might be considered as a potential tool for complying with data protection requirements. It might be used to inform the data subject on his/ her personal data undergoing processing, including the reason (purpose) for processing.

The Information Retrieval Framework is available as of the following support packages for SAP NetWeaver:

Table 1:

SAP NetWeaver Release	Available As Of
SAP NetWeaver 7.5	SP09
SAP NetWeaver AS for ABAP 7.51 innovation package	SP04
SAP NetWeaver AS for ABAP 7.52	SP00
SAP NetWeaver 7.5 for SAP S/4HANA 1511, on-premise edition	SP09
SAP NetWeaver 7.51 for SAP S/4HANA 1610	SP04
SAP NetWeaver 7.52 for S/4HANA 1709	SP00

## Scope of this Document

To be able to use the framework's functionalities, you must set up a data model containing all relevant database tables that you want to be searched for personal data. This how-to guide is intended to provide information to enable you to easily configure the data model and to readily utilize the framework.



<https://help.sap.com/doc/04e9cb8f9da44c1ebf35c03799c8fac2/7.51.4/en-US/IRF.pdf>

# Organize the „Right to be forgotten“



- List of all tables with personal data
- Identify data owners
- Data owner decides about actions and retention periods for **active** employees for each group of tables
- Data owner decides about actions and retention periods for **inactive** employees for each group of tables

Table	Content	Action for active PNR	Terms	Action for inactive PNR	Terms	Data Owner	ILM Objekt
/ALTRO/PLK_LOM	Protokollierung der Hinweise Prüfprogramm Abrechnung	Delete	3 month	Delete	3 month	HR	
/ALTRO/PLK_PR	Hinweisbestätigung Verwaltungsinformation	Delete	3 month	Delete	3 month	HR	
/ALTRO/PLK_PRHIS	Hinweisbestätigung Verwaltungsinformation	Delete	3 month	Delete	3 month	HR	
/IT2/EF_FARCLOG	IT2 eFile: Logtabelle für Archivierungsläufe						
ASSHR	Zuordnung HR zu AFRU bzw. ASSO B						HRTIM_SUBS
ASSOB	Zuordnungsobjekte						HRTIM_SUBS
BSEG	Belegsegment Buchhaltung						FI_DOCUMNT
FITV_HINZ_WERB_B	Hinzbeträge und Werbungskosten bei Belegen			Delete	7 years	HR	
FITV_HINZ_WERB_S	Hinzbeträge und Werbungskosten			Delete	7 years	HR	
HRLDAP_PERNR	Pernr, die ins LDAP geschickt werden müssen						
HRPAY00_NTTSK	Aufgaben - Zentrale Tabelle						
HRPMSIM	Simulationsergebnisse für Stellenwirtschaft						
HRPY_RGDIR	Directory für Abrechnungsergebnisse						
HRPY_WPBP	HR-PAY: Transparente Tabelle WPBP						
KNB1	Kundenstamm (Buchungskreis)					FI	FI_ACCRECV
LFB1	Lieferantenstamm (Buchungskreis)					FI	FI_ACCPAYB

# Blocking Access to Personal Data



Means change  
of authorisation  
concept

Makes data  
Invisible  
(Date dependent)

Allows  
retroactive  
accounting

Blocks access  
for users  
(while data can  
still be processed)

- A solution for personnel that has left.
- The retention period must be clarified.  
(Berlin: Personnel records must be kept for 6 years after pension leave/age)
- Easy to apply for HR-data: complete erasure of personnel numbers by SAP standard report RPUDELPN (RPUDELPP with four-eye-principle) .  
The report must be enhanced with a framework program for selection.  
Related Business Partners and Creditors are not deleted.
- Possibility to keep Mini Master
- Personal data has to be offered to archives before deletion.





- ILM can be used to extract sensitive data like garnishments or illnesses from active personnel
- Offers retention management
- Special ILM-authorisation-objects can be used to block access to HCM-data



- Limits retroactive accounting
- For most HCM-tables there are no ILM-data-objects up to now



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# How does SAP SLCM support GDPR compliance?

Some examples of our software's functionality that directly supports GDPR compliance are:

- Consent management mechanisms
- Information Lifecycle Management
- Reporting of personal data to an identified data subject
- Restricted access to personal data
- Read access logging to special categories of personal data
- Change logging of personal data
- Simplified deletion of personal data

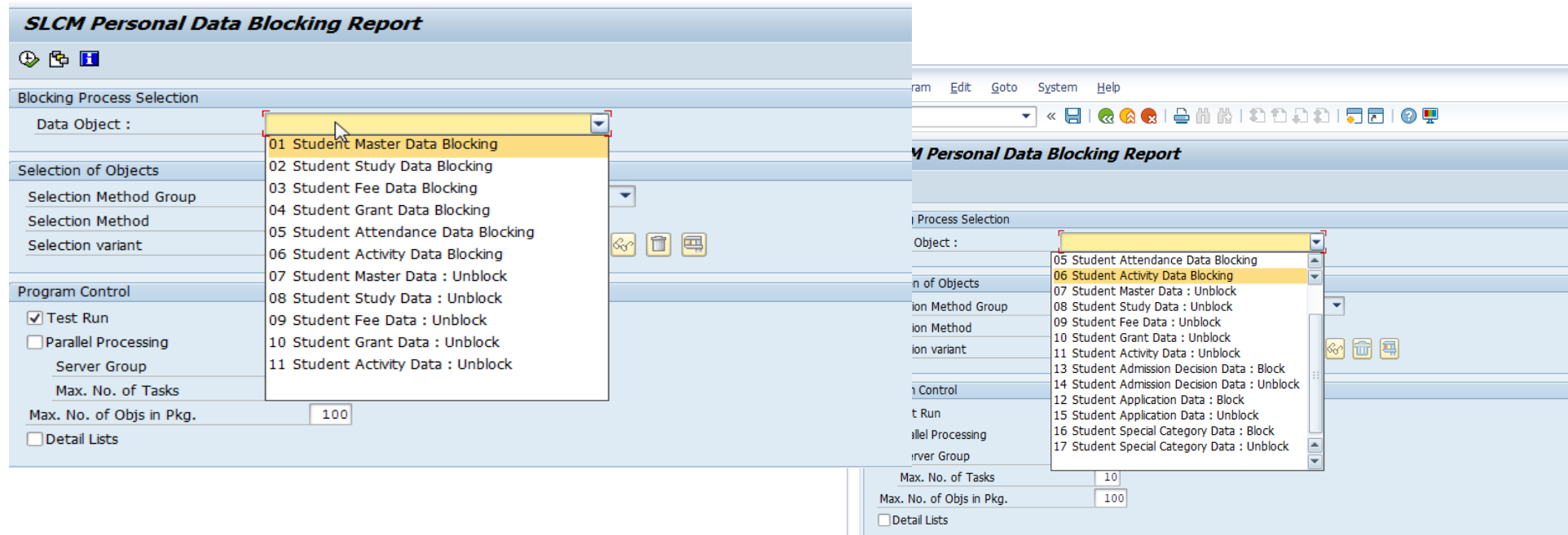
# Deletion and Archiving of Personal Data

- The **Student Lifecycle Management (SLCM)** solution uses **SAP Information Lifecycle Management (ILM)** to support the blocking and deletion of personal data.
- Customers looking for GDPR compliance in SLCM will need to use specific reports from SAP Information Lifecycle Management.
- SAP ILM component supports the entire software lifecycle including the **storage, retention, blocking, and deletion of data.**
- You can delete data by using the transaction **ILM\_DESTRUCTION** for the ILM objects of SLCM.
- Customers can now run the **RHIQ\_STUDENT\_ATTENDANCE\_DES** program to delete the attendance data for students.
- We have also provided several **archiving programs** to archive external transcripts from students, student grants data, student master data, etc.



# SLCM Blocking Personal Data report

- SLcM application already provides a blocking report for all personal data related to the Student : **Report program : RHIQ\_ILM\_DATA\_BLOCKING**
- We have recently added additional blocking objects for the most recent SLCM developments such as: Statistical Reporting, Decision Framework and Admission Portal
- In addition, SAP will provide another blocking object that will allow customers to block/unblock **student sensitive personal data**



# New Authorization object Special Category Personal Data ( ILM Based )Authorization

## New Authorization Object Required : P\_CM\_SPCDA

The end user should no longer be allowed to access the SLCM Special category personal data stored in blocked process tables. Authorization should be given to the special user to read the special category personal data from blocked process tables.

A new authorization object is required for Activities below:

- **Display**
- **Lock**
- **Unlock**

The Above authorization would be provided to specific user that will have the required authorizations in place .

**Authorization object P\_CM\_SPCDA can be created for this purpose.**

# End of Purpose Check (EoP)

SAP also delivers an **end of purpose check (EoP)** for the blocking of business partner data, for students registered in the SLCM application that are linked to a business partner.

The end-of-purpose check for SLCM is a simple check to ensure data integrity in the event of potential blocking. It checks whether there is any dependent data for a business partner that is a student in the SLCM application

# Read Access Logging

- The **Read Access Logging (RAL)** component can be used to monitor and log read access to data and provide information such as which business users accessed personal data (for example, fields related to bank account data), and when they did so.
- In RAL, you can configure which read-access information to log and under which conditions.
- We have provided RAL features for **SLCM Admission Portal**
- You can find further customizing information in this [link](#).
- Please refer to note [2375056](#) “Read Access Logging content for application Student Life Cycle Management (SLCM)”

# Availability of DPP enhancements

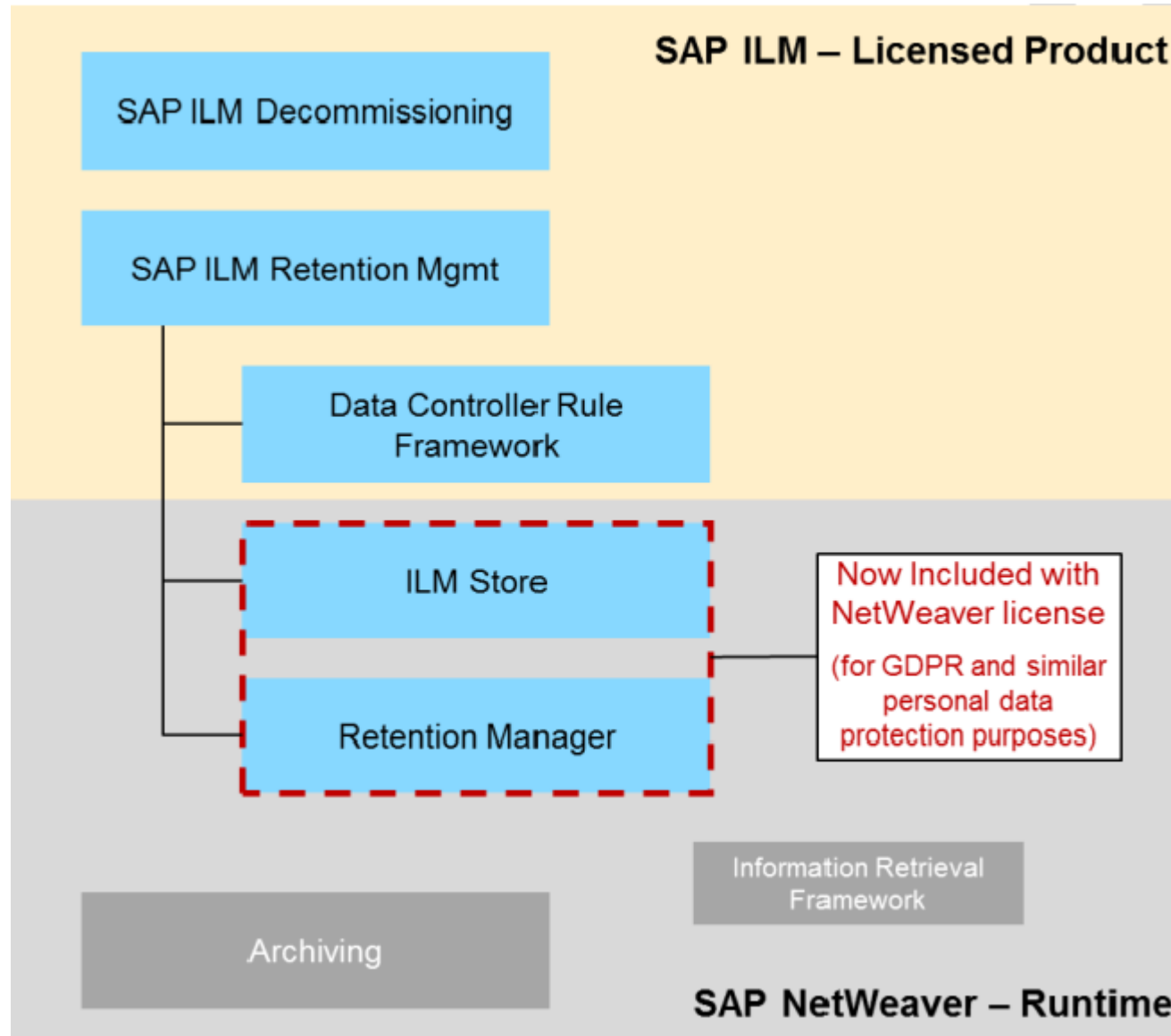
- The latest versions of SAP software feature enhanced and simplified Data Protection and Privacy (DPP) functionality, so customers will need to be running these versions to benefit from this.
- SLCM specific enhancements for DPP are available as of April 4th, 2018 with **SAP ERP 6.0 Enhancement Package 8, SP10 and S/4HANA 1709 FPS2.**
- A **Consent Management** and **Information Retrieval Framework (IRF) tool** were also made available with S/4HANA 1709 FPS2 as well as ERP Ehp8 SP10.

# Further Information

- Higher Education & Research SAP ERP [Security Guide](#)
- [Data Archiving](#) objects
- Business Partner [End of Purpose](#) (EoP) check
- [What's new](#) in SAP ERP Enhancement Package 8 SP10
- SAP note 1825544

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# What about Licenses?



INCLUDED IN NETWEAVER RUNTIME (NO ADDITIONAL LICENSE COST) FOR ADDRESSING REGULATORY REQUIREMENTS ON DATA PRIVACY FOR PERSONAL RELATED DATA:

- ILM Retention Management to set up and manage retention policies, store and retain data immutably according to applied policy, simplified blocking and deletion of personal related data, data destruction from archive or from database.
- Also included is usage of the ILM Store usage for File system, Hadoop, HANA DB and IQ.

SAP Information Lifecycle Management (ILM) License Changes in Respect of GDPR and Other Personal Data Privacy Regulations

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# Tops for Discussion

- How do non-EU countries feel affected bei GDPR
- How do EU and non-EU Universities prepare for GDPR compliance
- Which open issues do you see in the supporting functionality provided by SAP
- What additional engagement would you expect from SAP



elektronische Administration und Services

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