

Winners' Circle 2021 Privacy Statement

This Privacy Statement was updated on August 13, 2021.

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 of Winners' Circle 2021 is SAP America 3999 West Chester Pike, Newtown Square, PA 19073. Where a registration form is presented on this website, the controller may vary depending on the actual offering or the purpose of the data collection, but it is in any case displayed on the individual registration form's privacy statement.

What Personal Data does SAP collect?

If you use a registration form, SAP will collect the information you provide to SAP, which consists of your contact information (name, address, company, email and telephone number), date of birth, job title and function, and registration time/date ("Registration Data"). You may further provide to us information regarding emergency contact(s), visa requirements and event participation-related information (such as particular activities you register for), information on your hotel booking, your transportation and logistical requirements, excursions, childcare, and any particular interests and other information you provide to us as part of your Registration Data. If you provide a credit card number or bank details to order goods or services from SAP, then SAP will collect this information to process your payment for the requested goods or services.

If you choose to bring a guest that is a minor under 16 years, or equivalent minimum age in the relevant jurisdiction, SAP will collect from you such minor's first and last name, date of birth, and other details that may be required for your guest's activity participation.

SAP may record portions of the Event including general and specialized events / activities for broadcast to participants not attending the Event live, and for internal communications purposes about the Event ("Legitimate Recording"). You acknowledge that as a result of attending the Event, we may record your image, photograph, and voice by any technology or means indiscriminately as part of the Event recording where you are a non-material part of the aforementioned recording in accordance with and as allowed under applicable law. During events or instances where you volunteer to speak, you acknowledge that SAP may broadcast, film or photograph you individually; you also acknowledge that if you do not wish to be broadcasted, filmed or photographed in this way, you will 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 Winners' Circle 2021.

Why does SAP need your Personal Data?

SAP requires your Personal Data to:

- Provide you with access to the Winners' Circle registration system;
- provide you with access to the Winners' Circle Mobile App;
- set up your Winners' Circle 2021 experience; and
- deliver the ordered goods or services.

If you choose to bring a guest that is a minor under 16 years, or equivalent minimum age in the relevant jurisdiction, SAP will use the personal data of such minor that you provide for the purpose of administering attendance, planning travel accommodations, and participation in events.

Although providing Personal Data is voluntary, without your Personal Data,

- SAP cannot provide you with access to the Winners' Circle registration system;
- SAP cannot deliver services at the event; and
- Cannot allow your guests to attend and participate in the events

How long will SAP store your Personal Data?

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

- to make Winners' Circle 2021 available to you;
- to allow you to participate in Winners' Circle 2021

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:

- third party service providers; for e.g., consulting services and other additional related services, 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.

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 winnerscircle[@]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.

B. Processing based on a statutory permission

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 winnerscircle[@]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. You must consent to this agreement in order to participate in Winners' Circle 2021. If you do not consent and you wish to decline your invitation, please contact the Winners' Circle Event Team at winnerscircle[@]sap.com to cancel your registration.

Processing under applicable national laws

If the applicable national law allows SAP to do so, SAP will use information about you for a business purpose, some of which is Personal Data

- to plan and host events
- for marketing purposes related to upcoming events related to Winners' Circle
- to verify your identity and determine appropriate services

C. Processing Based on Consent

Special categories of Personal Data. In connection with the registration for and provision of access to an event or seminar, SAP may ask for information about your health for the purpose of identifying and being considerate of individuals who have disabilities or special dietary requirements throughout the event. Any such use of information is based on the consent you grant hereunder. Kindly note that if you do not provide any such information about disabilities or special dietary requirements, SAP will not be able to take any respective precautions.

Event profiling. If you register for an event, seminar, or webinar of SAP, SAP may share basic participant information (your name, company, and email address) with other participants of the same event, seminar, or webinar for the purpose of communication and the exchange of ideas.

Forwarding your Personal Data to other SAP companies. SAP may transfer your Personal Data to other entities in the SAP Group outside of the country you are located. The current list of SAP Group entities can be found here: SAP Group. In such cases, these entities will then use the Personal Data for the same purposes and under the same conditions as outlined in this Section C. above.

Forwarding your Personal Data to other third Parties. At your request, as indicated by your consent, SAP will transfer your registration data to the companies listed on the registration page outside of the country you are located. The companies will use your registration data for the purposes of their participation in the event and are obliged to delete the data

thereafter. If a company intends to use your data for any other purposes, they will contact you to explain how and for which other purposes they will use your registration data.

If you do not consent and you wish to decline your invitation, please contact the Winners' Circle Event Team at winnerscircle[@]sap.com to cancel your registration. In case of withdrawal, SAP will not process Personal Data and you will not be able to participate in Winners' Circle 2021.

D. Additional Country and Regional Specific Provisions

Colombia:

[Colombia-Specific Provisions](#) apply to citizens of the Republic of Colombia.

The Philippines:

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:

winnerscircle[@]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.

Russian Federation:

[Russian-Specific Provisions](#) apply to citizens of the Russian Federation.

South Africa:

Where SAP is subject to the requirements of the Protection of Personal Information Act, 2013 ("POPIA") in South Africa, the following also applies:

"Personal Data" as used in this Privacy Statement means Personal Information as such term is defined under POPIA.

"You" and "Your" as used in this Privacy Statement means a natural person or a juristic person as such term is used under POPIA.

SAP South Africa (Pty) Ltd, SAP (Africa Region) (Pty) Ltd, Quadrem (Pty) Ltd., Ambin (Pty) Ltd, [SAP Africa (Pty) Ltd with registered address at 1 Woodmead Drive, Woodmed (SAP South Africa) is subject to South Africa's Protection of Personal Information Act, 2013 (Act 4 of 2013) and responsible party under the POPIA.

You may request details of personal information which we hold about you under the Promotion of Access to Information Act 2 of 2000 ("PAIA"). For further information please review the SAP PAIA manual, located here.

Should you as an individual or a juristic person believe that SAP South Africa as responsible party has utilized your personal information contrary to POPIA, you undertake to first attempt to resolve any concerns with SAP South Africa.

Phone: 011 325 6000

Address: 1 Woodmead Drive Woodmead Johannesburg South Africa 2148

If you are not satisfied with such process, you have the right to lodge a complaint with the Information Regulator, using the contact details listed below:

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001, P.O. Box 31533, Braamfontein, Johannesburg, 2017
Email: complaints.IR@justice.gov.za

Enquires: infoereg@justice.gov.za

United States:

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

U.S. Children's Privacy.

SAP does not use personal data of minors for marketing purposes, nor does SAP sell or allow personal data to be disclosed by minors to SAP directly or by third parties.

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 winnerscircle[@]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.