SERVICE-related description

Managed SAP ETD

Version 1.0 (15.01.2024)

1. Designation and object of SERVICE

1.1 Object of Service:

The SERVICE relates to services in the area of „Managed SAP ETD “.

1.2 Purpose, Scope and Type of the Service:

The parties agree on the type and scope as well as the exclusive purposes of the commissioned data processing of the data by the contractor as follows:

The contractor provides the client with a built and configured SAP ETD system/SIEM system for Security Monitoring. Additionally, they provide technical and administrative services for the provision and operation of the application system in the contractor's data centre. The logs are sent from the connected log sources to the client's ETD instance. Security Monitoring is performed based on these logs. If the use cases result in noticeable activity, a corresponding alert will be generated.

1.3 Type of Data:

Commissioned Data Processing relates to the following types of data:

The types of data processed in the context of service provision cannot be precisely defined in advance. The types of data depend on the nature of the client’s requests (e.g. in support cases), the types and purposes of the client’s SAP-systems and on the data provided by the client itself in individual cases.

In any case, the Managed SAP ETD Services processes logs from the SAP systems. These logs may contain the following categories of personal data:

- Master and contact data (e.g. name, address, company, function, telephone number, fax, e-mail)
- User data (user names and passwords, user roles and access rights, login and logout times)
- Access data (information about access to various systems, applications or resources, access patterns and history)
- Device data (e.g. IP addresses, MAC addresses)
- Activity data (logs of activities and events that occur in the system; transactions, database queries and other actions)
- Geographical information (location data of users or devices to recognise unusual location patterns)

Special categories of data[1]:

☐ The Commissioned Data Processing does not concern any special categories of data within the meaning of Art. 9 GDPR.

☒ The Commissioned Data Processing concerns the following special categories of data within the meaning of Art. 9 GDPR:

The special categories of data processed in the context of service provision cannot be precisely defined in advance. The types of data depend on the nature of the client's requests, the types and purposes of the client's SAP-systems and on the data provided by the client itself in individual cases.

1.4 Categories of data subjects concerned by the commissioned data processing

The data concerns the data of the following categories of data subjects:

- Employees of the client who have a user in the log sources.

2. Designation of subcontractors

☐ No subcontractors are used as part of the Commissioned Data Processing.

☒ In accordance with section 8 of the FRAMEWORK AGREEMENT on the Commissioned Data Processing, the subcontractors listed below are used as part of the Commissioned Data Processing.

The following subcontractors process the data on behalf of the contractor for partial SERVICES of the Commissioned Data Processing:

Designation of subcontractor	Address Subcontractor	Description of the Commissioned Data Processing
OEDIV Romania SRL	UNITED BUSINESS CENTER 0 TIMIȘOARA S.R.L. Timișoara, 2 Piața Consiliul Europei square, Iulius Town, Timiș County Building 03, 3rd floor Postal Code: 300627	administrative services
SAP Deutschland SE & Co. KG	Hasso Plattner Ring 7 69190 Walldorf	The subcontractor is only considered as such if the client does not hold any support contracts with the subcontractor directly.

[1] Special categories of personal data include: Data revealing the ethnic origin, political opinions, religious or philosophical beliefs or trade union membership as well as genetic data, biometric data, health data and data relating to sex life or sexual orientation.

3. List of permitted Commissioned Data Processing activities in third countries

☐ No data processing takes place within the scope of the Commissioned Data Processing in third countries.

☒ In accordance with Section 2 of the FRAMEWORK AGREEMENT, the Client consents to the Contractor and/or subcontractors in the third countries specified below to carry out parts of the Commissioned Data Processing:

Designation of subcontractor	Description of the Commissioned Data Processing provided in third countries	Third country designation
SAP Deutschland SE & Co. KG	Manufacturer Support	The personal data will be stored within the European Union. As part of the support, the subcontractor has access from the following third countries: USA, China, India, Philippines, UK, Australia, Singapore, South Korea, Serbia, Tunisia, Brazil

4. Additional arrangements on SERVICE-related technical and organisational measures

☒ As part of the provision of the services, the Contractor shall take the technical and organisational measures defined in ANNEX 2 of the FRAMEWORK AGREEMENT to ensure the security of the Commissioned Data Processing in accordance with Art. 32 GDPR.

☐ In addition to the technical and organisational measures defined in ANNEX 2 of the FRAMEWORK AGREEMENT, the contractor shall take the technical and organisational measures described below as part of the provision of the SERVICES to ensure the security of the Commissioned Data Processing in accordance with Art. 32 GDPR.

Description of SERVICE-related technical and organizational measures:

☐ Instead of the technical and organisational measures defined in ANNEX 2 of the FRAMEWORK AGREEMENT, the contractor shall take the technical and organisational measures described below as part of the provision of the SERVICES to ensure the security of the Commissioned Data Processing in accordance with Art. 32 GDPR.

Description of SERVICE-related technical and organizational measures: