EuroPriSe European Privacy Seal

# Short Public Report

1. Name and version of the IT product:

   *The target of evaluation (ToE) okadis EU-DSGVO Cockpit has been evaluated based on Version 2.1. The ToE in question is an IT product.*

2. Manufacturer or vendor of the IT product:

   Company Name:

   *okadis Consulting GmbH*

   Address:

   *Frankfurter Str. 80, 65760 Eschborn*

   Contact Person:

   *Herr Marko Jendreck*

3. Time frame of evaluation:

   *The product was evaluated between 10/03/2020 -28/10/2020*

4. EuroPriSe Experts who evaluated the IT product:

   Name of the Legal Expert:

   *Alisha Gühr*

   Address of the Legal Expert:

   *datenschutz cert GmbH, Konsul-Smidt-Str. 88a, 28217 Bremen, Deutschland*

   Name of the Technical Expert:

   *Dr. Irene Karper*

   Address of the Technical Expert:

   *datenschutz cert GmbH, Konsul-Smidt-Str. 88a, 28217 Bremen, Deutschland*

5. Certification Body:

   *Name: EuroPriSe Certification Authority*
   *Address: Joseph-Schumpeter-Allee 25*
   *53227 Bonn*
   *Germany*
   *eMail: contact@european-privacy-seal.eu*

6. Specification of Target of Evaluation (ToE):

   *The ToE is the IT product okadis EU-DSGVO Cockpit.*

   *It is installed on-premise at the corporate clients (hereinafter referred to as clients) of okadis Consulting GmbH and is located exclusively on their systems. The okadis EU-DSGVO Cockpit is based on SAP and serves as a software solution for restriction and anonymisation of data in ERP systems based on SAP (S/4). The solution is implemented in the okadis namespace and cannot be changed by the client without documented modification.*

   *The okadis EU-DSGVO Cockpit has been developed for ERP systems in the banking sector, but can also be used with other SAP applications in other industries.*

*The focus lies on personal data for business partner management and the associated business-related data (such as loans, posting documents or securities). The okadis EU-DSGVO Cockpit uses the same data basis as the SAP system of the respective client. No data from the clients systems is stored in the okadis EU-DSGVO Cockpit. Instead, the okadis EU-DSGVO Cockpit is a software solution for displaying specific data attributes of the client platforms and enables an automatic mechanism for restricting or anonymising personal data in the client SAP systems. Via "live view" it can be used as a mask for an improved overview of personal data. There are no interfaces to okadis Consulting GmbH and its systems. No data, including log data, flows from or back into the okadis EU-DSGVO Cockpit. All data remain in the client's SAP systems.*

*SAP systems are usually structured in such a way that each application has its own modules with its own data repository. The okadis EU-DSGVO Cockpit can be used as an additional module to unravel the data. For this purpose, okadis Consulting GmbH provides a file (so-called "transport"), which is imported at the client's site.*

*The minimum requirement for the okadis EU-DSGVO Cockpit is SAP Release 740 with Support Package (SP) 0020 and the use of the SAP Business Partner (BP). The platform is SAP Netweaver.*

*Especially for the restriction function the connection to SAP ILM (Information Lifecycle Management) with the following business functions is required:*

- *BUPA_ILM_BF (ILM-based restriction and deletion of business partners)*
- *ERP_CVP_ILM_1 (ILM-based restriction and deletion of customer and supplier master data)*
- *ILM_BLOCKING (general ILM restriction functionality)*
- *ILM (Information Lifecycle Management)*

*The ToE includes the components*

- *okadis EU-DSGVO Cockpit*
- *the provided file "transport"*
- *the standard decision tree*
- *The "Random" method as a standard of anonymisation*

*Not part of the ToE are:*

- *SAP systems and their configuration at the client*
- *SAP ILM and ILM interface*
- *Modifications of the okadis EU-DSGVO Cockpit by the client, e.g. in the decision tree or in the anonymisation technique*
- *Modifications of the okadis EU-DSGVO cockpit within the scope of customizing*
- *The deployment environment of the client*
- *The implementation of the software, support and maintenance by okadis Consulting GmbH, the associated data processing and the tools used for these purposes, such as a ticket system*
- *The web pages https://www.okadis.de/*
- *Apps for smartphones or tablets and other products and services of okadis.*

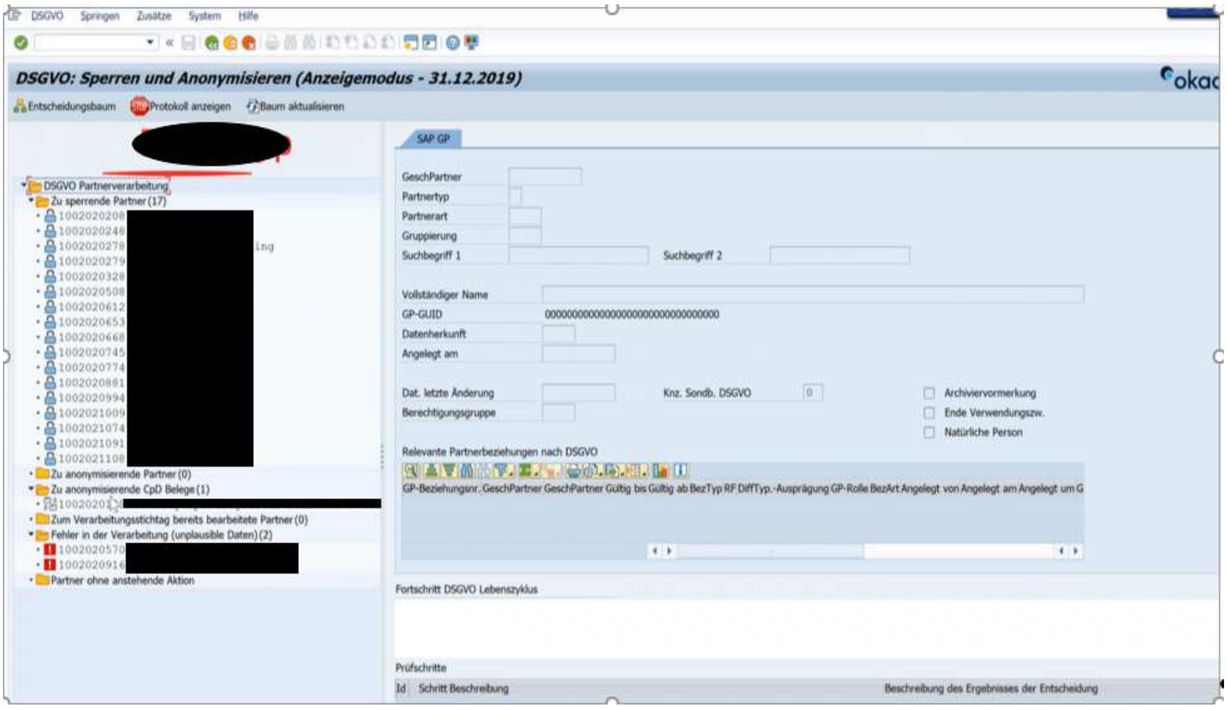
7. General description of the IT product:

*After installation and configuration in a SAP system, okadis EU-DSGVO Cockpit enables restriction and anonymisation (and thus deletion) as well as a summary of all personal data via an evaluation of master and key data from ERP systems based on SAP (S/4). The results can be used e.g. for general information, for information creation according to art. 12ff. GDPR, for considerations of a data protection impact assessment or for an extraction in terms of data portability.*

*The okadis EU-DSGVO Cockpit is available in SAP in form of a (so-called) "transaction" for users with the appropriate authorizations.*

*Anonymisation serves as a means of choice, since deletion of data in SAP systems could lead to a high error rate for further operation (e.g. referential integrity). okadis EU-DSGVO Cockpit facilitates deletion of only the personal reference while other data is retained, so that the function of SAP is not affected.*

*Via a decision cockpit, the user can execute the filter, lock and anonymisation functions.*



DSGVO: Sperren und Anonymisieren (Anzeigemodus - 31.12.2019)

[redacted]

- DSGVO Partnerverarbeitung
  - Zu sperrende Partner (17)
    - 1002020208 [redacted]
    - 1002020246
    - 1002020278
    - 1002020279
    - 1002020328
    - 1002020508
    - 1002020612
    - 1002020653
    - 1002020668
    - 1002020745
    - 1002020774
    - 1002020881
    - 1002020994
    - 1002021009
    - 1002021074
    - 1002021091
    - 1002021108
  - Zu anonymisierende Partner (0)
  - Zu anonymisierende CpD Belege (1)
    - 10020201 [redacted]
  - Zum Verarbeitungsstichtag bereits bearbeitete Partner (0)
  - Fehler in der Verarbeitung (unplausible Daten) (2)
    - 1002020570 [redacted]
    - 1002020916
  - Partner ohne anstehende Aktion

GeschPartner
Partnertyp
Partnerart
Gruppierung
Suchbegriff 1 Suchbegriff 2

Vollständiger Name
GP-GUID 00000000000000000000000000000000
Datenherkunft
Angelegt am

Dat. letzte Änderung Knz. Sondb. DSGVO 0 □ Archiviervormerkung
Berechtigungsgruppe □ Ende Verwendungszw.
□ Natürliche Person

Relevante Partnerbeziehungen nach DSGVO

| GP-Beziehungsnr. | GeschPartner | GeschPartner | Gültig bis | Gültig ab | BezTyp | RF | DiffTyp.-Ausprägung | GP-Rolle | BezArt | Angelegt von | Angelegt am | Angelegt um | G |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

Fortschritt DSGVO Lebenszyklus

Prüfschritte

| Id | Schritt Beschreibung | Beschreibung des Ergebnisses der Entscheidung |
|---|---|---|

Abbildung 1 Startpage okadis EU-DSGVO Cockpit

*The central administration and storage of personal data at the client's site occurs in the library "SAP GP". In addition to the data in SAP GP, personal data can also occur in the master data of a customer and a vendor. The business transactions refer to the personal data or receive them "inherited" (i.e. copy of the information). In addition, this data is extracted, historicized and processed in the analytics or reporting system ("SAP BW") and via interfaces (file server).*

*The okadis EU-DSGVO Cockpit does not have a separate login. It is rather an additional functionality in SAP. Users therefore log in exclusively with their SAP account, usually with a user name and password or with the authentication specified by the client. The access data and authorizations are inherited to the tool by the SAP system.*

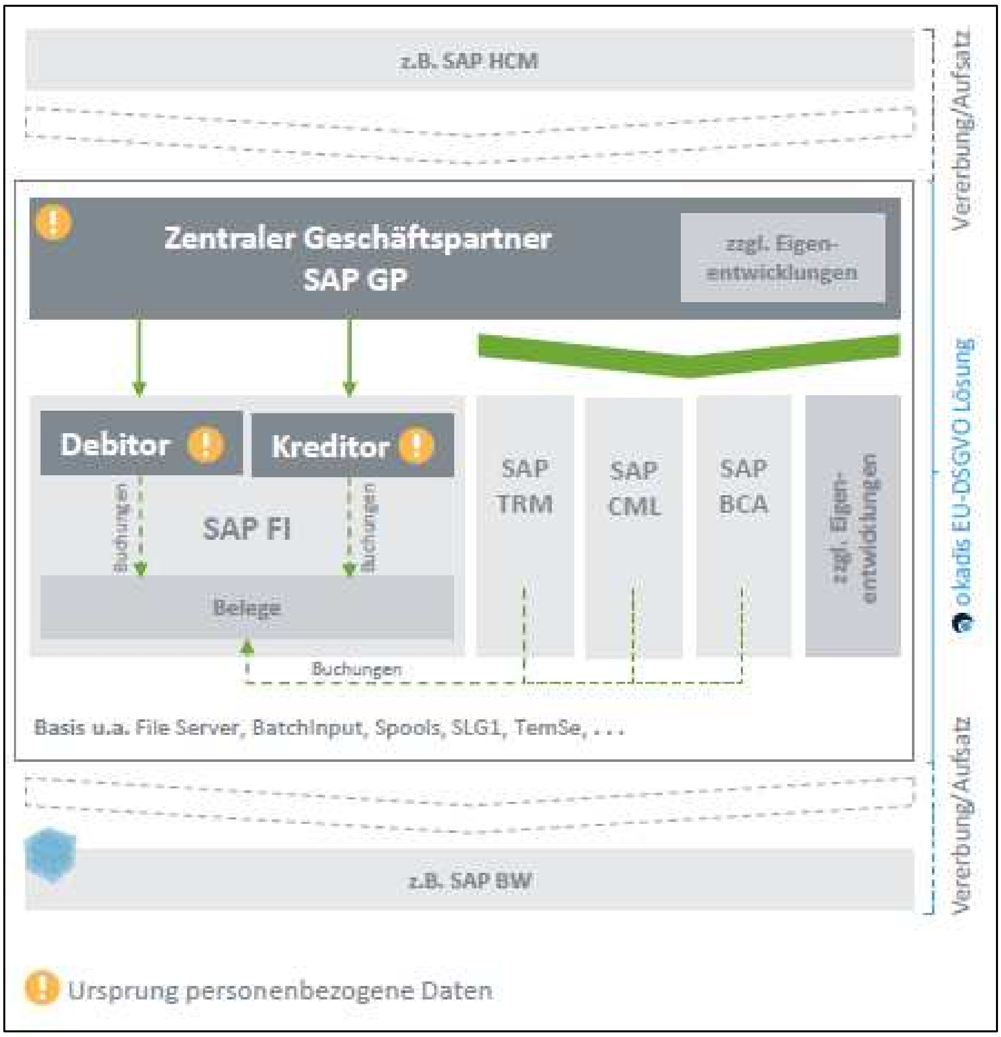

z.B. SAP HCM
Zentraler Geschäftspartner SAP GP
zzgl. Eigen-entwicklungen
Debitor
Kreditor
Buchungen
SAP FI
Buchungen
Belege
SAP TRM
SAP CML
SAP BCA
zzgl. Eigen-entwicklungen
Buchungen
Basis u.a. File Server, BatchInput, Spools, SLG1, TemSe, . . .
z.B. SAP BW
Ursprung personenbezogene Daten
Vererbung/Aufsatz
okadis EU-DSGVO Lösung
Vererbung/Aufsatz

Abbildung 2 Impact of okadis EU-DSGVO Cockpit

***Decision tree / Search***

*To use the functions of okadis EU-DSGVO Cockpit, personal data must be identified in the relevant services (database tables) of the clients. With okadis EU-DSGVO Cockpit, SAP systems can be analysed and filtered for information that indicates the need for deletion under data protection law.*

*So-called decision trees represent the criteria according to which the SAP GP automatically determines whether personal data require restriction and/or anonymisation. okadis Consulting GmbH delivers a standard decision tree as a template. The implementation of additional decision trees is possible through flexible extensions of customer-specific SAP tables (Y* Z*), via microfunctions and customizing. This allows, among other things, to distinguish between different types of documents and to take different retention periods into account.*

*The focus of the okadis EU-DSGVO Cockpit lies on business information and the corresponding accounting documents. For this reason, a 10-year retention period usually applies according to German tax and commercial law.*

*The decision trees are a basic requirement for the evaluation of business partners and business data and the subsequent anonymisation. They form the framework in which structures and process steps the okadis EU-DSGVO Cockpit has to perform its search.*

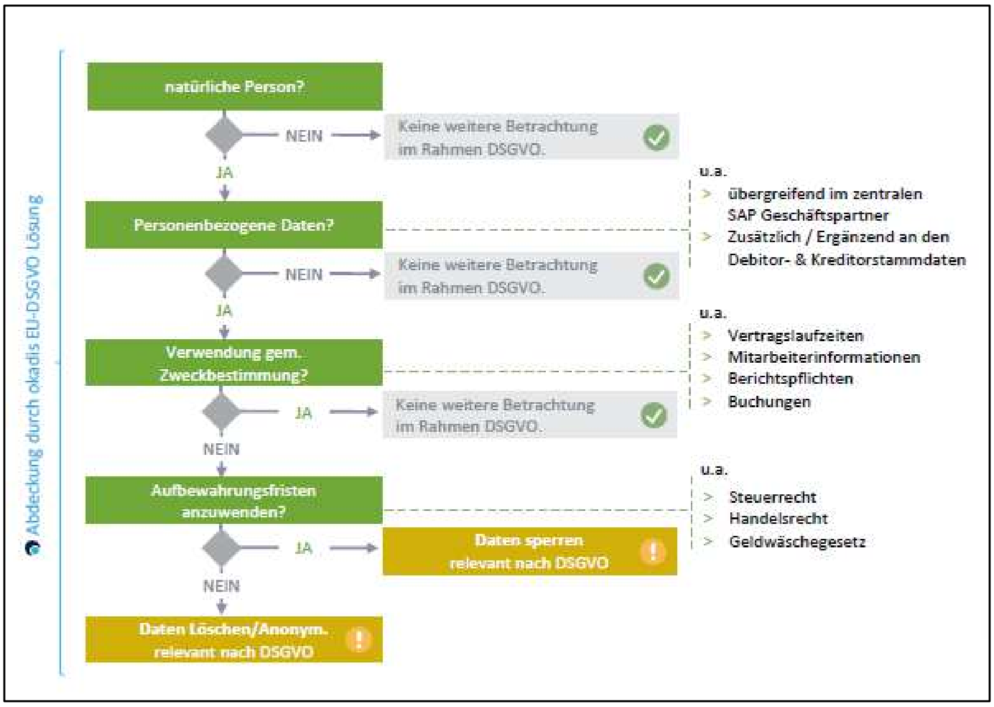
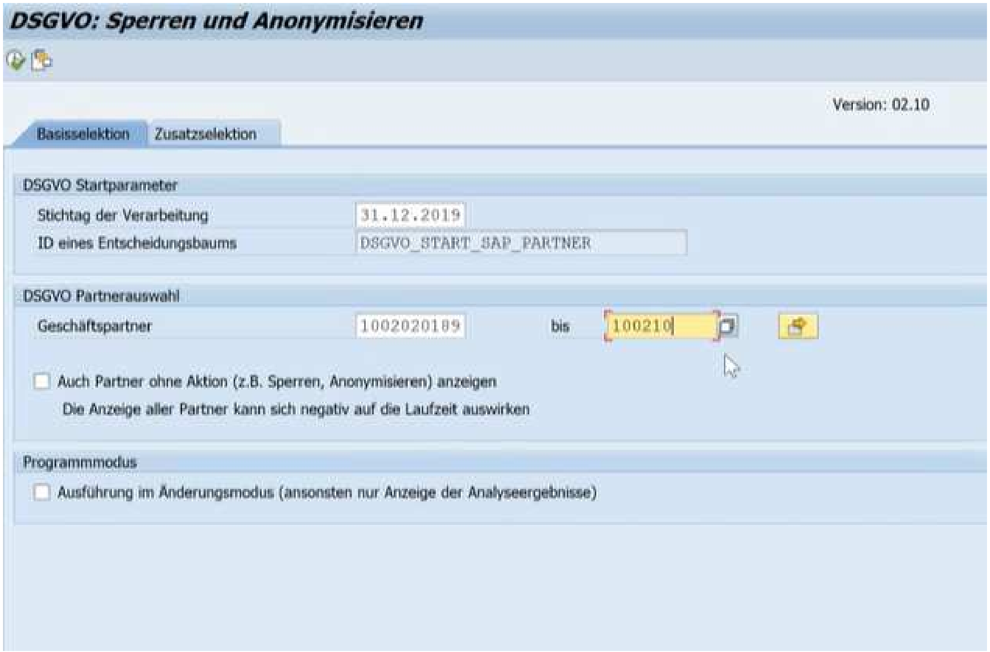

Abdeckung durch okadis EU-DSGVO Lösung
natürliche Person?
NEIN
Keine weitere Betrachtung im Rahmen DSGVO.
JA
Personenbezogene Daten?
u.a.
> übergreifend im zentralen SAP Geschäftspartner
> Zusätzlich / Ergänzend an den Debitor- & Kreditorstammdaten
NEIN
Keine weitere Betrachtung im Rahmen DSGVO.
JA
Verwendung gem. Zweckbestimmung?
u.a.
> Vertragslaufzeiten
> Mitarbeiterinformationen
> Berichtspflichten
> Buchungen
JA
Keine weitere Betrachtung im Rahmen DSGVO.
NEIN
Aufbewahrungsfristen anzuwenden?
u.a.
> Steuerrecht
> Handelsrecht
> Geldwäschegesetz
JA
Daten sperren relevant nach DSGVO
NEIN
Daten Löschen/Anonym. relevant nach DSGVO

Figure 1 Life cycle of personal data

*The business partner number in SAP is relevant for the selection function of the correct data record. The business partner numbers serve as a central ID in SAP and are automatically assigned sequentially by the SAP system. By specifying this number or entire number ranges, the user can for example filter business partners of a certain number range at a certain key date.*



DSGVO: Sperren und Anonymisieren

Version: 02.10

DSGVO Startparameter

Stichtag der Verarbeitung: 31.12.2019

ID eines Entscheidungsbaums: DSGVO_START_SAP_PARTNER

DSGVO Partnerauswahl

Geschäftspartner: 1002020189 bis 100210

□ Auch Partner ohne Aktion (z.B. Sperren, Anonymisieren) anzeigen

Die Anzeige aller Partner kann sich negativ auf die Laufzeit auswirken

Programmmodus

□ Ausführung im Änderungsmodus (ansonsten nur Anzeige der Analyseergebnisse)

Figure 2 ***Business partner number range selection***

*To perform actions (lock/unlock/anonymise), the user must select the checkbox under "Program Mode". The checkbox is only displayed to users with the appropriate authorization. The checkbox activates the change mode. If this checkbox is not selected, the data is just displayed without the possibility to make changes (simulation mode).*

*Subsequently, an overview of the processed partners is displayed for the selected area in the context of a categorization based on the GDPR life cycle. The categorization includes the following states:*

*- active partners (current relationship)*

*- partners to be locked (partners without a current relationship in the case of a retention period that has not yet expired and for which no order to lock has yet been issued)*

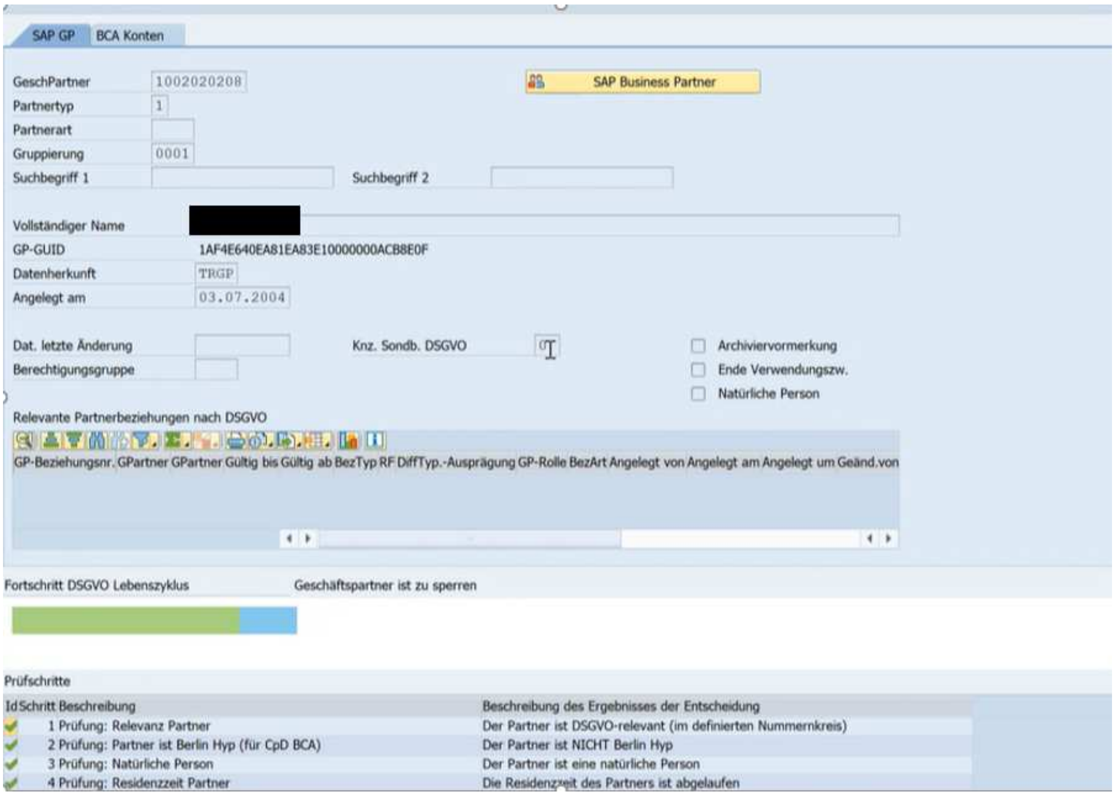
*- locked partners (partners without a current relationship in the case of a retention period that has not yet expired but for which an order to lock has been issued)*

*- partners to be anonymised (restricted partner if the retention period has expired and no anonymisation order has been issued yet)*

*- anonymised partners (partners for whom an anonymisation command has already been issued, the record is anonymised and the personal reference removed)*

*The data records to be restricted or deleted are collected via an "activity proposal" and displayed in the central decision cockpit for final release by an authorized user in the responsible department. In doing so, the system points out that many factors indicate the need for anonymisation or restriction: The results are flagged according to the need for action and via double-click in the cockpit the user can navigate to the SAP system where a more detailed view of the data can be obtained, provided the user has the necessary authorization.*

*Afterwards the data for the restriction or anonymisation run has to be selected manually.*



| | | | |
|---|---|---|---|
| GeschPartner | 1002020208 | | |
| Partnertyp | 1 | | |
| Partnerart | | | |
| Gruppierung | 0001 | | |
| Suchbegriff 1 | | Suchbegriff 2 | |
| Vollständiger Name | [redacted] | | |
| GP-GUID | 1AF4E640EA81EA83E10000000ACB8E0F | | |
| Datenherkunft | TRGP | | |
| Angelegt am | 03.07.2004 | | |
| Dat. letzte Änderung | | Knz. Sondb. DSGVO | ☐ Archiviervormerkung |
| Berechtigungsgruppe | | | ☐ Ende Verwendungszw. |
| | | | ☐ Natürliche Person |

Relevante Partnerbeziehungen nach DSGVO

| GP-Beziehungsnr. | GPartner | GPartner | Gültig bis | Gültig ab | BezTyp | RF | DiffTyp.-Ausprägung | GP-Rolle | BezArt | Angelegt von | Angelegt am | Angelegt um | Geänd.von |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

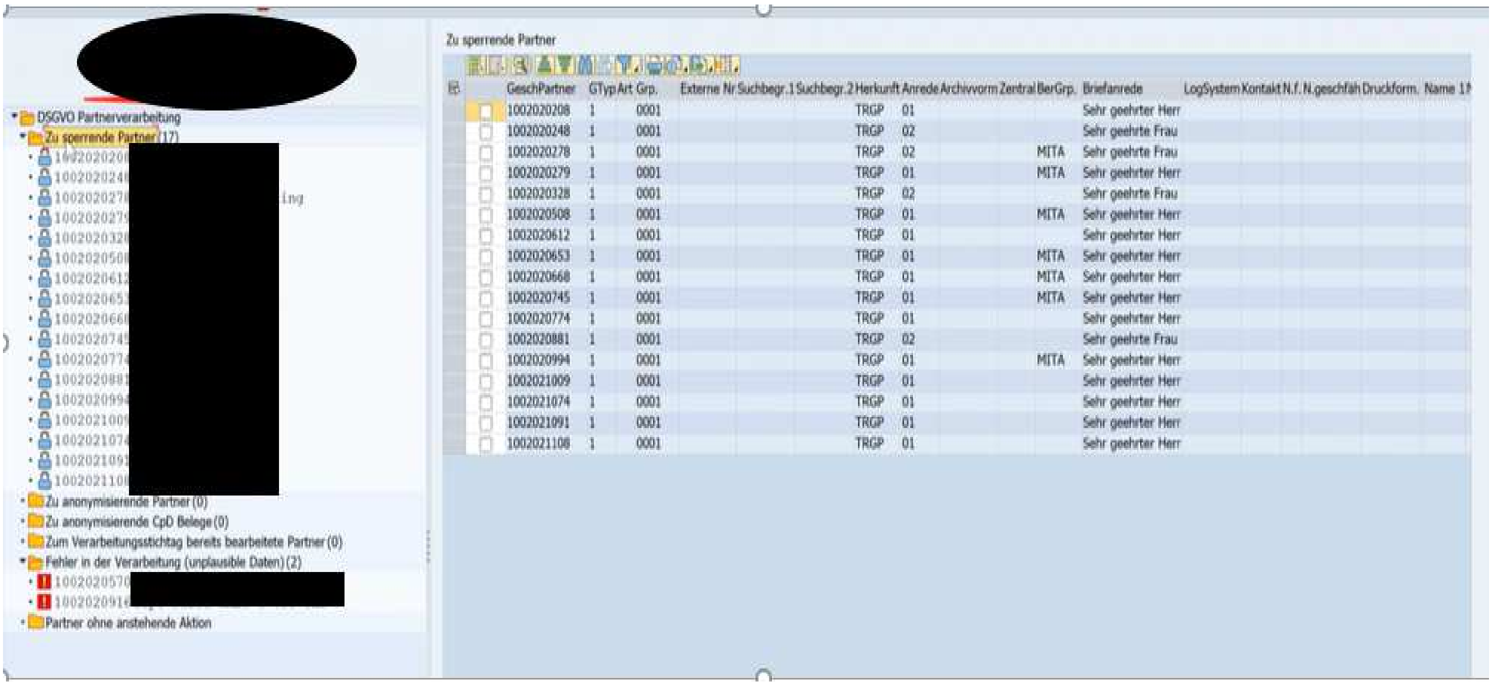
| Fortschritt DSGVO Lebenszyklus | Geschäftspartner ist zu sperren |
|---|---|

Prüfschritte

| Id | Schritt | Beschreibung | Beschreibung des Ergebnisses der Entscheidung |
|---|---|---|---|
| ✓ | 1 | Prüfung: Relevanz Partner | Der Partner ist DSGVO-relevant (im definierten Nummernkreis) |
| ✓ | 2 | Prüfung: Partner ist Berlin Hyp (für CpD BCA) | Der Partner ist NICHT Berlin Hyp |
| ✓ | 3 | Prüfung: Natürliche Person | Der Partner ist eine natürliche Person |
| ✓ | 4 | Prüfung: Residenzzeit Partner | Die Residenzzeit des Partners ist abgelaufen |

Figure 3 ***View of individual business partners***

*In the cockpit authorized users can issue an individual release to restrict or anonymise the affected partners (depending on the requirements). It is possible to select all business partners separately or to trust the decision tree of the okadis EU-DSGVO cockpit and confirm the execution for all or for several data records of a category at the same time, the so-called "Business Partner-Locking Mass Processing".*



[redacted]

- DSGVO Partnerverarbeitung
  - Zu sperrende Partner (17)
    - 1002020206 [redacted]
    - 100202024 [redacted]
    - 100202027 [redacted]
    - 100202027 [redacted]
    - 100202032 [redacted]
    - 100202050 [redacted]
    - 100202061 [redacted]
    - 100202065 [redacted]
    - 100202066 [redacted]
    - 100202074 [redacted]
    - 100202077 [redacted]
    - 100202088 [redacted]
    - 100202099 [redacted]
    - 100202100 [redacted]
    - 100202107 [redacted]
    - 100202109 [redacted]
    - 100202110 [redacted]
  - Zu anonymisierende Partner (0)
  - Zu anonymisierende CpD Belege (0)
  - Zum Verarbeitungsstichtag bereits bearbeitete Partner (0)
  - Fehler in der Verarbeitung (unplausible Daten) (2)
    - 100202057 [redacted]
    - 100202091 [redacted]
  - Partner ohne anstehende Aktion

Zu sperrende Partner

| | GeschPartner | GTyp | Art | Grp. | Externe Nr | Suchbegr.1 | Suchbegr.2 | Herkunft | Anrede | Archivvorm | Zentral | BerGrp. | Briefanrede | LogSystem | Kontakt | N.f. | N.geschfäh | Druckform. | Name 1 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| □ | 1002020208 | 1 | | 0001 | | | | TRGP | 01 | | | | Sehr geehrter Herr | | | | | | |
| □ | 1002020248 | 1 | | 0001 | | | | TRGP | 02 | | | | Sehr geehrte Frau | | | | | | |
| □ | 1002020278 | 1 | | 0001 | | | | TRGP | 02 | | | MITA | Sehr geehrte Frau | | | | | | |
| □ | 1002020279 | 1 | | 0001 | | | | TRGP | 01 | | | MITA | Sehr geehrter Herr | | | | | | |
| □ | 1002020328 | 1 | | 0001 | | | | TRGP | 02 | | | | Sehr geehrte Frau | | | | | | |
| □ | 1002020508 | 1 | | 0001 | | | | TRGP | 01 | | | MITA | Sehr geehrter Herr | | | | | | |
| □ | 1002020612 | 1 | | 0001 | | | | TRGP | 01 | | | | Sehr geehrter Herr | | | | | | |
| □ | 1002020653 | 1 | | 0001 | | | | TRGP | 01 | | | MITA | Sehr geehrter Herr | | | | | | |
| □ | 1002020668 | 1 | | 0001 | | | | TRGP | 01 | | | MITA | Sehr geehrter Herr | | | | | | |
| □ | 1002020745 | 1 | | 0001 | | | | TRGP | 01 | | | MITA | Sehr geehrter Herr | | | | | | |
| □ | 1002020774 | 1 | | 0001 | | | | TRGP | 01 | | | | Sehr geehrter Herr | | | | | | |
| □ | 1002020881 | 1 | | 0001 | | | | TRGP | 02 | | | | Sehr geehrte Frau | | | | | | |
| □ | 1002020994 | 1 | | 0001 | | | | TRGP | 01 | | | MITA | Sehr geehrter Herr | | | | | | |
| □ | 1002021009 | 1 | | 0001 | | | | TRGP | 01 | | | | Sehr geehrter Herr | | | | | | |
| □ | 1002021074 | 1 | | 0001 | | | | TRGP | 01 | | | | Sehr geehrter Herr | | | | | | |
| □ | 1002021091 | 1 | | 0001 | | | | TRGP | 01 | | | | Sehr geehrter Herr | | | | | | |
| □ | 1002021108 | 1 | | 0001 | | | | TRGP | 01 | | | | Sehr geehrter Herr | | | | | | |

Figure 4 ***Selection for mass processing***

*The release function forms an additional process step and allows a professionally qualified check before restriction or anonymisation. A further multi-eye approval (i.e. multi-stage test and approval procedure) based on this does not exist.*

*The okadis EU-DSGVO Cockpit thus enables an automated command for restriction or anonymisation, whereas no independent execution takes place without an explicit execution command by an authorised user.*

*The progress of the GDPR lifecycle for personal data (data records) is indicated and displayed in colour, depending on whether a data record is e.g. created, locked or anonymised. The individual test steps based on the decision tree are also indicated in the cockpit.*

***Restriction and anonymisation***

*The okadis EU-DSGVO Cockpit must always be executed with the key date "end of year". The process of checking the data records by existing okadis EU-DSGVO Cockpit clients in the banking sector usually runs once a year. However, it is possible to retrieve the data daily and execute the process.*

*Afterwards it is necessary to check whether the master data and documents require a processing step, i.e. whether active business partners (incl. customer/vendor) are to be restricted or restricted business partners (incl. customer/vendor) are be anonymised. okadis EU-DSGVO Cockpit uses the decision tree to check whether data to be restricted or anonymised is available. In the tool's standard decision tree, this is done in a three-stage restriction and anonymisation procedure based on a data life cycle in accordance with the GDPR. At first the data is determined as described above, then it is checked and approved and finally restricted, decoupled and anonymised.*

*Restriction of master data, i.e. of personal data in the SAP FI environment, is carried out by integrating SAP ILM in okadis EU-DSGVO Cockpit. The restriction function prevents any processing that is not based on legal, contractual or statutory obligations during the retention period without deleting the data and is therefore equivalent to a restriction of processing. For this purpose a check is carried out via decision tree whether data records are in the period of the intended purpose, i.e. active business relationship, or in the period of retention. Via the decision cockpit, an authorized employee issues the release of a restriction. This is done during the program flow (so-called trigger) by calling the ILM standard function for restricting master data. The approval results in a restriction of business partners, customers and vendors on master data level with inheritance up to attached documents. After the restriction, partners can no longer be processed in the system and cannot be found in the search. Using the partner, e.g. for postings, is subsequently prevented by SAP standard. Only users with special authorizations can display, evaluate and, if necessary, unblock them.*

*Since a restriction requires the integration of SAP ILM in okadis EU-DSGVO Cockpit via interface, several ILM business functions are required to use the lock function.*

*SAP ILM must be set up at the client's site in such a way that it only reacts to the trigger of the program for relevance determination. Additionally, it has to be ensured that no business partners, customers or vendors, who have not received the trigger from the program for relevance determination, are taken into account when executing ILM.*

*In the case of restriction, the business partner can be unrestricted by authorized persons. If an anonymisation has been performed, however, the business partner is irrevocably anonymised.*

*The anonymisation of data, on the other hand, is done directly by the cockpit and runs through a standardized anonymisation procedure "Random" programmed by okadis Consulting GmbH, so that it is part of the ToE. Instead of this "Random" function, the client can also implement a different programming via customizing, but this is outside the ToE.*

*The basis for anonymisation by "Random" is once again the decision tree. It provides for an annual check to determine which master data and documents of business partners (incl. customer/vendor) can be anonymised. okadis EU-DSGVO Cockpit uses the decision tree to check whether data to be anonymised is available. If the end of the retention period has been reached (the end is always the end of the year), the data can be anonymised in the following year. This is indicated to the user in the decision cockpit.*

*The anonymisation process must be initiated and approved by an authorized user. The basis for the anonymisation process is the "Anonymisation release report".*

*For anonymisation by means of "Random", SAP is considered as a whole. Tables and fields in SAP are taken into account, which can contain personal data. These are data of business partners, customers, vendors, FI and the tables attached to the change documents. They are identified on the basis of* *the SAP standard archiving objects (SARA). The data is subsequently anonymised in its entirety across all implemented SAP modules, including active "YZ tables" (i.e. customer-specific application tables). All characters are replaced by a random sequence of characters. Time data is replaced by a random date.*

*Anonymisation is performed online and directly in the respective data tables of the underlying SAP system. The data is not persisted in the okadis EU-DSGVO Cockpit.*

*The field "Special treatment GDPR" ensures that the user can exclude certain business partners from automatic restriction and anonymisation. This applies, for example, to special cases such as data records required for legal disputes or data records relating to so-called CpD ("Conto pro Diverse") respectively dummy partners. These special types of business partner accounts are used for clients with whom business is only done once or infrequently (e.g. one-time billing of travel expenses for an applicant). These special cases and one-time partners are treated differently in the restriction and anonymisation program by the marking in the business partner.*

*In addition, a check is implemented on the field "DSGVO_SONDB" before an anonymisation run to avoid the risk of incorrect manual entries.*

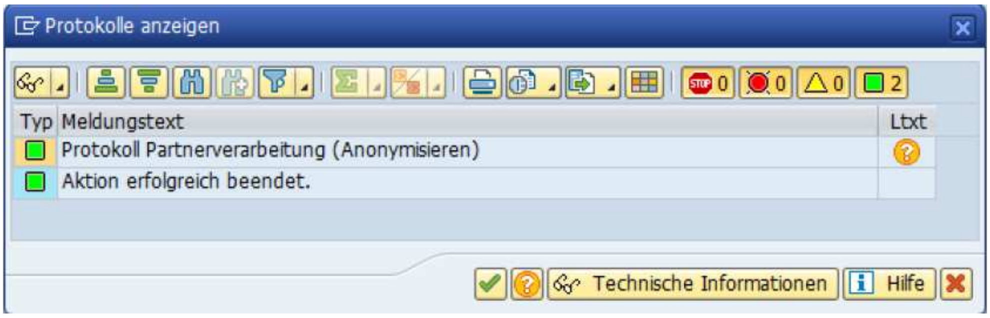
*In the okadis EU-DSGVO Cockpit the process can be described as follows:*

*In order to anonymise a business partner, the user has to mark the partners in the decision cockpit and confirm the execution by clicking on the button "Anonymise partner".*

*After clicking on the button "Anonymise partner", a pop-up opens with the information whether the business partner anonymisation should actually be carried out. This step informs the user that by confirming with "Yes", the personal data on the business partner will be irretrievably anonymised and a recovery is impossible.*

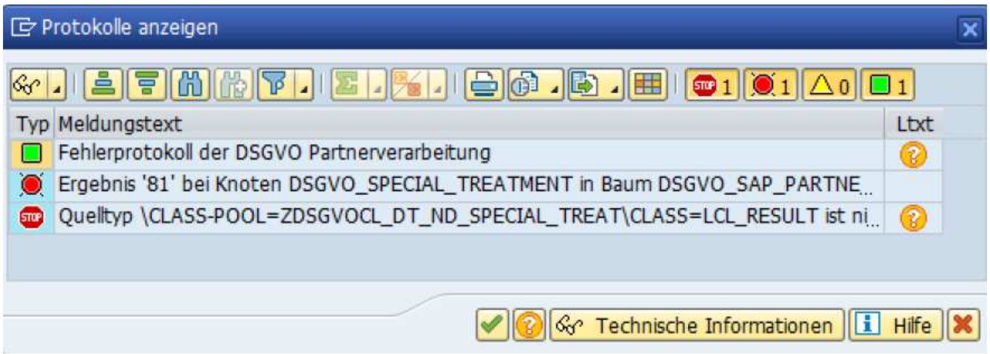
*After the anonymisation any reference to a person is removed from the SAP system.*

*Subsequently, the user receives a confirmation called "Log" via a popup, which confirms the execution or, if necessary, displays errors.*



| Typ | Meldungstext | Ltxt |
|---|---|---|
| 🟩 | Protokoll Partnerverarbeitung (Anonymisieren) | ? |
| 🟩 | Aktion erfolgreich beendet. | |

Figure 5 Protocol successful anonymisation



| Typ | Meldungstext | Ltxt |
|---|---|---|
| 🟩 | Fehlerprotokoll der DSGVO Partnerverarbeitung | ? |
| 🔴 | Ergebnis '81' bei Knoten DSGVO_SPECIAL_TREATMENT in Baum DSGVO_SAP_PARTNE... | |
| STOP | Quelltyp \CLASS-POOL=ZDSGVOCL_DT_ND_SPECIAL_TREAT\CLASS=LCL_RESULT ist ni... | ? |

Figure 6 ***Protocol for faulty execution***

***Information and data portability***

*okadis EU-DSGVO Cockpit can also display data of individual business partners using the search and filter function described above. Based on the results, the user can determine which personal data is stored where exactly for which business partners in which SAP modules and in which retention cycle it is located. Based on the listing, it is possible to implement further rights of data subjects, such as the determination of data stocks for the creation of mandatory documentation according to Art. 12ff. GDPR, for information in case of a data subject's inquiry or for the compilation of data for data portability in other systems (provided that the data can be output by SAP).*

8. Transnational issues:

*The use of okadis EU-DSGVO Cockpit is not limited to Germany. Rather it can be used worldwide.*

9. Tools used by the manufacturer of the IT product:

   *No tools relevant for the evaluation were used. okadis EU-DSGVO Cockpit, however, uses an SAP system. In addition, a connection to the SAP ILM interface is required to use the restriction function in okadis EU-DSGVO Cockpit.*

10. Edition of EuroPriSe Criteria used for the evaluation:

    *The experts used EuroPriSe Criteria Catalogue, version January 2017.*

11. Evaluation results:

    *okadis EU-DSGVO Cockpit facilitates restriction and anonymisation of personal data in ERP systems with a focus on privacy by design. As an additional tool for SAP systems okadis EU-DSGVO Cockpit helps clients to unravel the large amount of data processed in SAP systems and reduce it to the bare essentials. This has been successfully implemented through the structure of okadis EU-DSGVO Cockpit, as it does not store any data itself, but acts as an interface in SAP systems.*

    *In order to fulfil requirements of data protection law within SAP systems an overview over the personal data processed in such systems is necessary at all times. okadis EU-DSGVO Cockpit allows for filtering specific sets of data in SAP and, therefore, supports the handling of duties under data protection law especially regarding the information according to Art. 12ff. GDPR or requests for information within the right of access.*

    *At the core of the tool stands the restriction and anonymisation of personal data within SAP systems, without deletion of the relevant data in the SAP system in order to prevent disruptions in functioning. The Austrian Data Protection Authority has recognized anonymisation as a form of deletion in a decision dated December 5, 2018: "The removal of personal references ("anonymisation") of personal data can thus be a possible means of deletion in the sense of Art. 4 Z 2 in conjunction with Art. 17 Par. 1 GDPR. In the "Positionspapier zur Anonymisierung unter der DSGVO unter besonderer Berücksichtigung der TK-Branche" of 10.02.2020, the German Federal Commissioner for Data Protection in Germany shares this view: "An obligation for immediate deletion can be fulfilled by anonymisation." Through a real anonymisation, the okadis EU-DSGVO Cockpit can therefore implement a deletion.*

*In okadis EU-DSGVO Cockpit the anonymisation involves individual anonymisation of each character with a process to ensure that the result does not match the original.*

*No anonymisation is applied for the business partner numbers in SAP by okadis EU-DSGVO cockpit, in order to not jeopardize the functionality of SAP. The question arises whether, if necessary, with the inclusion of additional information, such as a previous export of the non-anonymised data record, a re-identification outside the SAP system and outside the okadis EU-DSGVO Cockpit would be possible and thus result in a lack of a "real" anonymisation. According to GDPR Recital 26, "objective factors, such as the cost of identification and the time required for it" play a role in determining whether anonymisation is sufficient to prevent identification. According to the " Positionspapier zur Anonymisierung unter der DSGVO unter besonderer Berücksichtigung der TK-Branche " of the Federal Commissioner for Data Protection and Freedom of Information, with reference to the prevailing view in the literature and to the ruling of the European Court of Justice of 19.10.2016, C-582/14, it states: "An absolute anonymisation in such a way that the restoration of personal reference is not possible for anyone is frequently not likely to be possible and is generally not required under data protection law. As a rule, it is sufficient that the personal reference is removed in such a way that re-identification is practically impossible, because the personal reference can only be restored with a disproportionate expenditure of time, cost and manpower."*

*A disproportionately high expenditure of time, costs, manpower and resources is required to perform re-identification outside the okadis EU-DSGVO Cockpit and SAP. Reidentification would thus only be possible in case of misuse of data backups of the SAP system. Users of okadis EU-DSGVO Cockpit are sensitised for this in a privacy hints leaflet. This leaflet makes very clear that an export of the business partner numbers and the related personal data would bear the risk of an unlawful re-identification of anonymised data within the ToE at a later point. The leaflet asks the users to dispense with such data exports and to raise the awareness of all relevant staff for this issue. Therefore, the used technique in okadis EU-DSGVO Cockpit is considered as "genuine" anonymisation in the sense of the GDPR and the form of anonymisation of personal data using the okadis EU-DSGVO Cockpit removes all reference information to a personal date, which is equivalent to data deletion.*

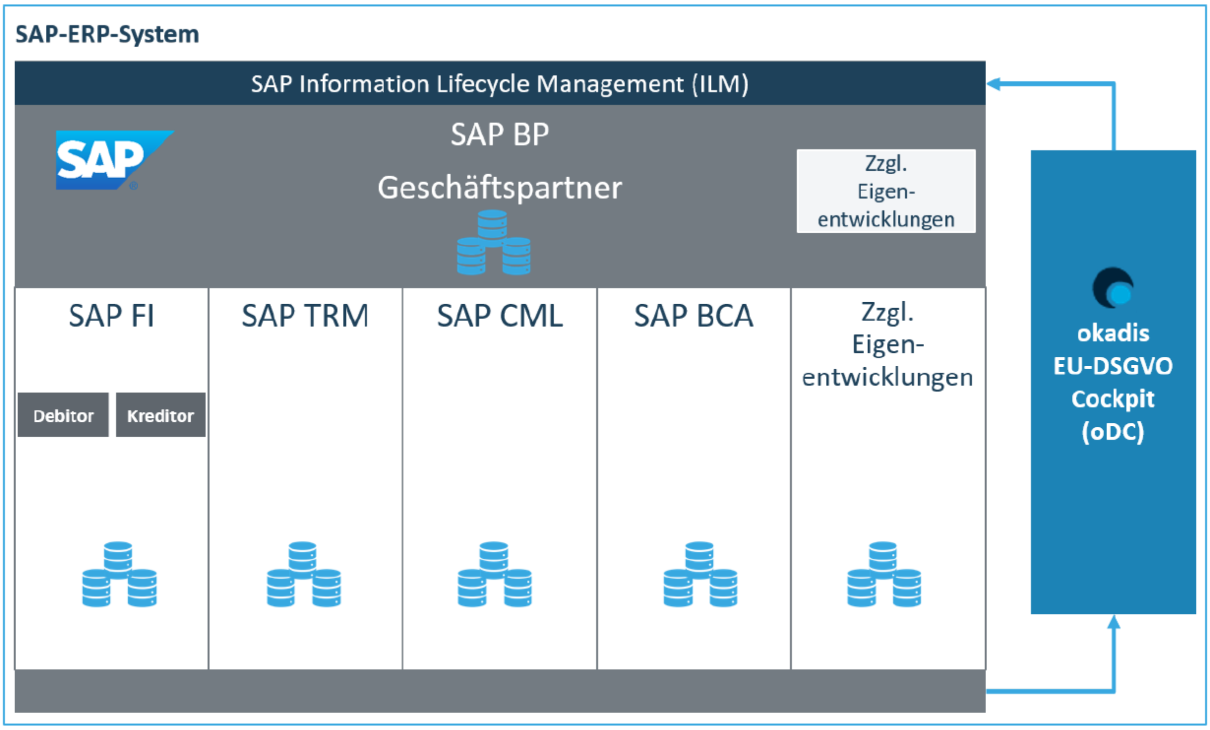
*The decision cockpit in okadis EU-DSGVO Cockpit allows users to display all relevant personal data and easy approval of restriction and anonymisation in the SAP system via the relevant mechanisms in okadis EU-DSGVO Cockpit.*

*The decision criteria for the retention periods in okadis EU-DSGVO Cockpit are set by the tool's decision tree. Further decision trees are possible through a flexible extension with customer-specific SAP tables via microfunctions and customizing. This allows, among other things, to differentiate between different types of documents and to store different retention periods. The focus of the okadis EU-DSGVO Cockpit is on business information and the corresponding accounting documents. For this reason, a 10-year retention period usually applies according to German tax and commercial law.*

*Data processing within okadis EU-DSGVO Cockpit is limited to personal data, which are necessary to fulfil the purpose. Relevant data is displayed from the SAP systems within the interface of okadis EU-DSGVO Cockpit as requested by the user. In principle, business-related data is concerned, however, it cannot be ruled out that personal data may also be processed. okadis EU-DSGVO Cockpit supports data minimization despite the complexity of SAP systems by providing users with an overview of the processed partner and business information in the GDPR lifecycle via the decision cockpit, thus clarifying the scope of data processing. In addition, it is possible to jump directly from the display in the decision cockpit to the respective places in the SAP system and view the entire data set. Furthermore, the anonymisation / deletion supports the limitation of data processing to the necessary extent.*

*As okadis EU-DSGVO Cockpit is implemented on-premise of clients no data is processed by okadis as a processor on behalf of their clients within the scope of the ToE.*

12. Data flow:


SAP-ERP-System
SAP Information Lifecycle Management (ILM)
SAP
SAP BP
Geschäftspartner
Zzgl. Eigen-entwicklungen
SAP FI
Debitor
Kreditor
SAP TRM
SAP CML
SAP BCA
Zzgl. Eigen-entwicklungen
okadis EU-DSGVO Cockpit (oDC)

13. Privacy-enhancing functionalities:

*okadis EU-DSGVO Cockpit is an additional tool for SAP systems that has been specially developed for data protection. Since SAP systems typically work with a large amount of data, it helps clients to unravel this data and reduce it to the bare essentials. This has been successfully implemented through the structure of okadis EU-DSGVO Cockpit, as it does not store any data itself. The scope of data processing using okadis EU-DSGVO Cockpit is tailored to the data required by each client. It was found that okadis EU-DSGVO Cockpit serves the purpose of processing as little data as possible and only relevant data.*

*Exemplary in the sense of privacy by design, the tool realizes the anonymisation of data, the right to erasure as well as the data reduction in complex SAP systems and supports with its results the implementation of information requirements and data portability.*

14. Issues demanding special user attention:

*None.*

15. Compensation of weaknesses:

*There are no requirements assessed as “barely passing”.*

16. Decision table on relevant requirements:

| ***EuroPriSe Requirement*** | ***Decision*** | ***Remarks*** |
|---|---|---|
| Data Avoidance and Minimisation | *excellent* | *product is designed to facilitate anonymisation within SAP systems and does not store any data* |
| Transparency | *adequate* | *documentation and privacy hints leaflet are informative, up-to date and understandable* |
| Technical-Organisational Measures | *adequate* | *Measures are appropriate and state of art* |
| Data Subjects' Rights | *excellent* | Product realizes the anonymisation of data, the right to erasure as well as the data reduction in complex SAP systems and supports implementation of information requirements and data portability. |

## Experts' Statement

We affirm that the above-named IT product / IT-based service has been evaluated according to the EuroPriSe Criteria, Rules and Principles and that the findings as described above are the result of this evaluation.

Bremen, 02.11.2020 Alisha Gühr Alisha Gü

Place, Date Name of Legal Expert Signature of Legal Expert

Bremen, 02.11.2020 Dr. Irene Karper Irene Karper

Place, Date Name of Technical Expert Signature of Technical Expert

## Certification Result

The above-named IT product / IT-based service passed the EuroPriSe evaluation.

It is certified that the above-named IT product / IT-based service facilitates the use of that product or service in a way compliant with European regulations on privacy and data protection.

Sebastian Meissner

Digitally signed by Sebastian Meissner
DN: cn=Sebastian Meissner, o=EuroPriSe GmbH, ou=EuroPriSe CA, email=meissner@european-privacy-seal.eu, c=DE
Date: 2020.11.02 16:59:59 +01'00'

Place, Date Name of Certification Authority Signature