

Mastering EU GDPR

Intelligent Implementation with SAP ILM
and PBS Archive Solutions



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What Requirements Do You Have to Meet?

The European Commission has strengthened the rights of consumers with the “right to be forgotten”. The entry into force of the EU General Data Protection Regulation (EU GDPR) regulates and restricts long-term, unrestricted processing of digital information referring to individuals. Since the provisions of the EU GDPR came into effect on May 25 2018, all IT systems that store and process personal data must delete this data or subject it to massive access restrictions once it no longer fulfills the purpose for which it was collected.

What are the Consequences for You?

Non-compliance can be costly. In the past, the German Federal Data Protection Act (BDSG) set a maximum liability limit of EUR 300,000. Now, provisions such as Article 83 (5) of the GDPR are coming into force, allowing the supervisory authorities to impose fines of up to EUR 20 million or, in the case of corporate groups, up to four percent of the total worldwide revenue for the preceding financial year.

These heavy financial penalties are intended as a deterrent and, according to the GDPR, will mainly be imposed on companies, although the EU member states have the option of specifying “other sanctions” in the event of infringements.

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How the regulation affects personal data in your SAP system

Is Your SAP System Landscape Affected?

All companies are affected, because the regulation also applies to HR systems. What's more, all companies with SAP ERP and industry solutions are affected, particularly where there is a B2C (business-to-consumer) business relationship. These include, for example, utilities, telecommunications, and insurance companies. Technical implementation of the EU GDPR calls for strict regulation of data access to personal master data and transaction data during and after the period in which the purpose of its collection applies. As a result, it is generally advisable to review your company's specific processes and data structures, especially as SAP Information Lifecycle Management (ILM) includes an enhanced GDPR approach for implementing the regulation in SAP ERP, SAP HCM, and industry solutions (Rheinwerk publishing house: GDPR and SAP).

New Functionality in SAP ILM Smooths the Way

Until now, the SAP ILM solution has been confined primarily to organizing temporary storage of documents and SAP data objects in an unchangeable format in a compliant storage system. In addition, there is the option of organizing deletion of data from the SAP application once the retention period has expired. Key elements of the solution are the SAP-specific WebDAV interface for hierarchical storage of archive data and the Retention Manager (IRM) for lifecycle management of data objects. SAP has now taken the requirements of the GDPR into account by enhancing the rules in IRM. Transaction data can be blocked by archiving and access control after the purpose for which it was gathered has expired if more far-reaching regulations, such as the GoBD*, do not allow it to be deleted immediately. Processing of master data, such as customers or vendors, is restricted in the relevant SAP environment by an enhanced authorization concept and blocked for general data access.

Once all the retention periods have expired, the application data can be deleted as required by the GDPR in accordance with the rules defined in SAP IRM.

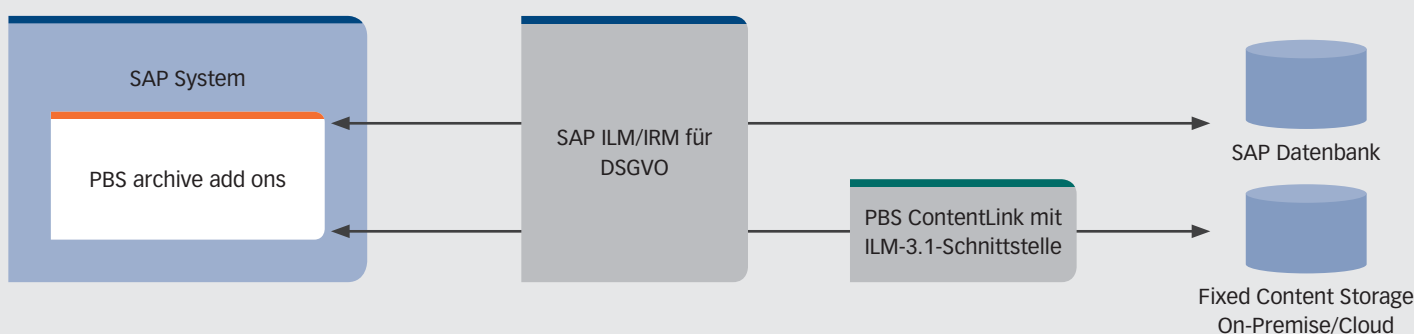
Why SAP ILM Alone is Not Enough

To meet current requirements with SAP ILM, you need an archive system with a WebDAV interface. This is where PBS ContentLink comes in, providing an efficient interface between SAP systems and compliant storage systems that fulfills precisely the requirements in this case. This PBS solution, which is certified by SAP for the current SAP ArchiveLink and for the WebDAV ILM interface, features high availability, high scalability, and low administration.

Transaction data is blocked by means of an enhanced authorization concept when archived transaction data is accessed. Performing classic ADK archiving is an implicit key requirement for using the blocking concept for transaction data in accordance with the GDPR in SAP ILM. Archived application data can be displayed to the usual extent using SAP's Archive Information System (AS), provided that the additional S_IRM_BLOC authorization has been defined in the user master. AS allows access to archive data using enhanced SAP standard transactions. However, the number of supporting transactions is limited, and not all processes (for example, SD document flow) can continue to be used without restriction after data archiving.

* German principles for proper management and storage of books, records, and documents in electronic form and for data access

Seamless Integration of PBS Archive Add Ons with SAP ILM





Total Data Access with PBS Archive Add Ons

To enable user-friendly access to all archive and database data, PBS Software offers PBS Archive add ons – add-on solutions for archiving SAP data that you can deploy immediately. They closely resemble the relevant SAP modules and enhance standard SAP transactions and reports by providing optimized archive access. When users deploy PBS archive add ons in tandem with SAP ILM, blocking or deletion of master data, and especially archived transaction data by SAP's Information Retention Manager (IRM) is taken into account in the same way as it would if the data were accessed directly. The PBS solution synchronously blocks all relevant archive index data that control data access automatically. This data can then be removed from the PBS index asynchronously in a deletion run. Tables containing personal data can be identified in the SAP system before the GDPR implementation by means of a PBS analysis run. This makes it considerably easier to get started with the implementation.

Taking a Broader View

Companies must adapt flexibly to new legal requirements, including when these relate to archived personal SAP data. Aspects such as industry-specific codes of conduct, or data privacy (for example, protection against misuse of stored banking and insurance information) also play a role. Sensitive data must therefore be encrypted and accessible only to authorized

persons. However, organizational changes, such as the merger of business units or a carve-out, may also make it necessary to adjust the archived data.

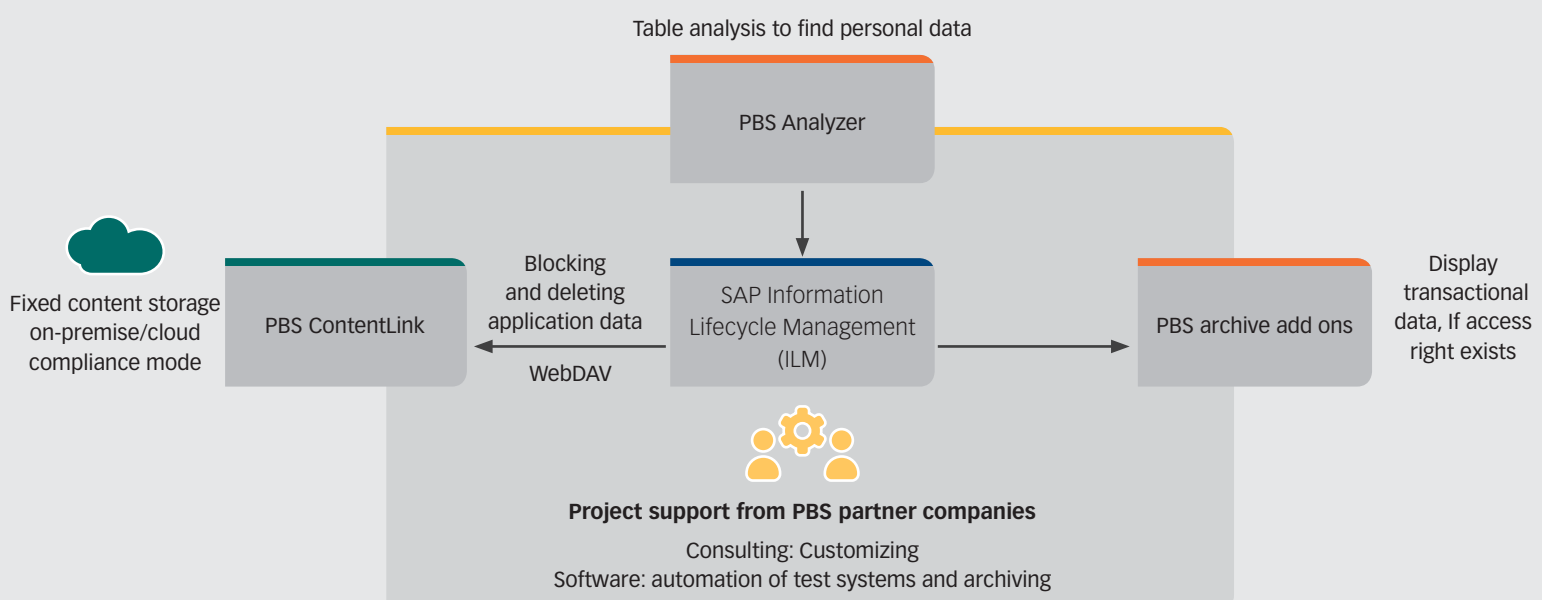
Storage systems ensure that archived objects, such as documents, print lists, DART files, etc., cannot be changed. During workflow processes or specific storage requests, they protect all relevant information against intentional or unintentional destruction.

Retention periods can be defined for individual object types within the scope of retention management. This can be implemented using SAP's Information Retention Manager (IRM) or the PBS ContentLink, which use the ArchiveLink and the WebDAV interfaces for data storage. Liability and warranty claims may require a considerably longer retention period (up to 30 years) than the statutory period of 10 years. However, this does not usually affect all data, but only individual data objects or data types.

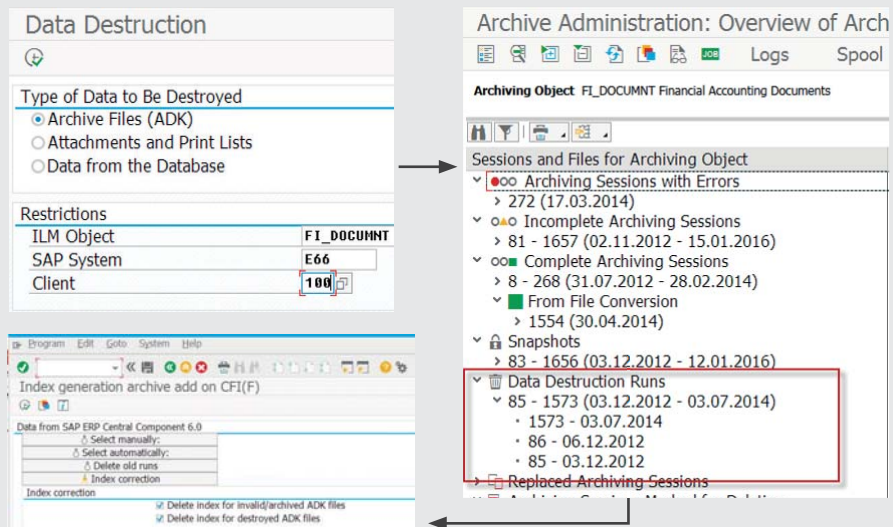
Systematically Changing Archive Data

Putting these industry-specific requirements into practice can make it necessary to mask, encrypt, or, in individual cases, delete already archived data. For the more than 600 different SAP archiving objects that currently exist, this is not possible using standard SAP means. That is why PBS has developed the PBS Archive Data Conversion tool (PBS ADC) for generic archive data

Effectively Restricting Processing of Personal Data



Destroying SAP Archive Files and Synchronizing PBS Archive Data Access



The screenshot displays two main windows from the PBS software. The left window, titled 'Data Destruction', shows the 'Type of Data to Be Destroyed' section with 'Archive Files (ADK)' selected. Below this, the 'Restrictions' section shows 'ILM Object' as 'FI_DOCUMENT', 'SAP System' as 'E66', and 'Client' as '100'. The right window, titled 'Archive Administration: Overview of Arch', shows a tree view of 'Sessions and Files for Archiving Object'. A red box highlights the 'Data Destruction Runs' section, which includes sessions like '85 - 1573 (03.12.2012 - 03.07.2014)' and '85 - 03.12.2012'. Arrows indicate the flow of data from the destruction configuration to the session overview.

conversion. The various conversion tasks can be configured centrally and validated by the specialist departments using a release process.

The changes made are documented directly in the corresponding archive file so that adjustments to the archive data remain transparent even when porting to another system landscape. If there is a change in the compliance requirements for business data that is protected against change, the conversion process is performed by updating to a new archive file. Legacy archive data that is no longer required is logically deleted in the SAP standard system.

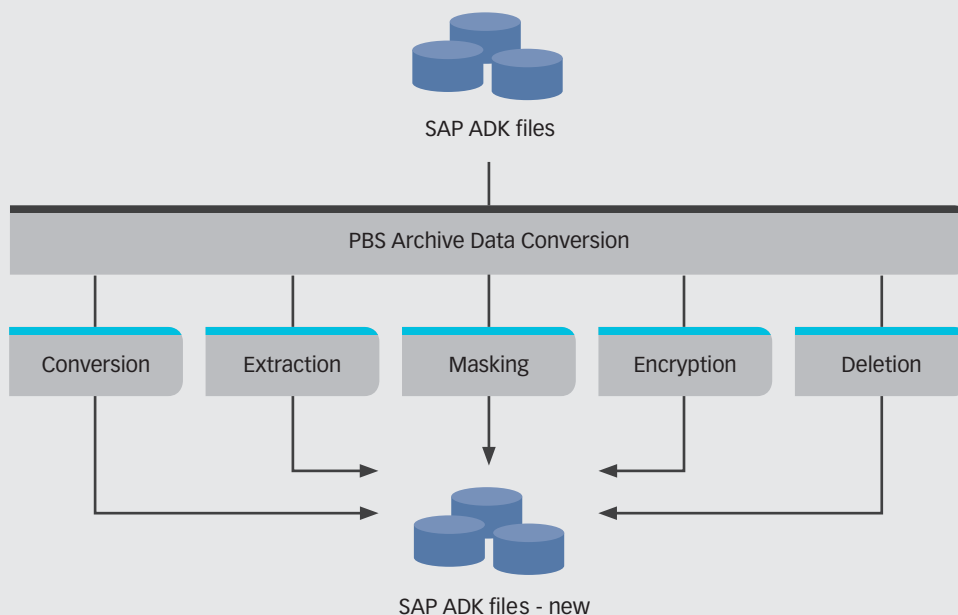
Customizing and Implementation by Our Partner Network

The PBS software can be installed quickly and easily in your SAP landscape. If you are interested, you are welcome to test the PBS solutions free of charge.

If you require expert support for a more complex archiving project, we will be happy to put you in touch with suitable PBS consulting partners. Interested?

At info@pbs-software.com, we're here for you.

Archive Data Conversion



PBS Software GmbH

PBS Software GmbH is a leading provider of add-on solutions that enhance your SAP system in the areas of data management, data archiving, nearline storage, information lifecycle management, as well as compliant data storage, data extraction, and decommissioning of systems.

Big-name customers in Germany and abroad have been successfully deploying the company's solutions for more than 25 years. PBS Software GmbH is internationally recognized as a proven expert in complex, integrated access to "hot" and "cold" data.

With its innovative nearline storage solutions, PBS Software GmbH improves the options for analyzing big data and is ideally placed to meet current and future requirements in the SAP space. PBS solutions are certified by SAP, and PBS Software GmbH has been an SAP partner for many years (currently in the SAP Partner Edge Build Program).

You can find an overview of all available PBS solutions on our website.

ST-ADDONS B.V.

ST-ADDONS has as its mission to assist SAP users with solutions to utilize their existing SAP™ investments more efficiently and more clever. Hereto ST-ADDONS uses SAP certified software products that have been implemented worldwide with thousands of customers to their complete satisfaction.

ST-ADDONS B.V. was founded in 2003 by Etienne Stouten, since 1983 one of the first in The Benelux to have been actively involved with SAP, amongst others as one of the co-founders of SAP Nederland. He has ample experience with several SAP developments and applications and has an excellent knowledge of the Dutch SAP market.

ST-ADDONS may contribute in the identification of solutions with the help of software related to SAP maintenance, the archiving of SAP data, the shutdown/consolidation/splitting of SAP systems and many other applications. Many of our products are SAP administrator and user oriented to make their lives easier, to reduce the costs, and to optimize the maintenance or use of SAP.

ST-ADDONS⁺

ST-ADDONS B.V.
Octaafstraat 12
5245 BN Rosmalen, NL
Phone: +31 6 53527525
info@st-addons.nl

