

EU-GDPR

Implementation with kgs solutions

The issue

The 'right to be forgotten' serves to ensure that digital information relating to personal data is not stored on a permanent basis.

Since the GDPR came into effect on 25.05.2018, all personal data that is stored in computerised information systems must be deleted, or access to this data restricted, once the purpose for collecting the data has been fulfilled.

The regulation states: "Any person should have [...] a 'right to be forgotten', where the retention of [their] data is not in compliance with this regulation. In particular, data subjects should have the right that their personal data are erased and no longer processed, where the data are no longer necessary in relation to the purposes for which the data are collected or otherwise processed, where data subjects have withdrawn their consent for processing or where they object to the processing of personal data concerning them or where the processing of their personal data otherwise does not comply with this Regulation."

The GDPR explicitly stipulates that the appropriate technical and organisational measures should be taken to ensure compliance with the principles of data protection. These include pseudonymisation, data minimisation and appropriate access restrictions.

Personal data are data that refer to an 'identified' or 'identifiable' natural person.

When can personal data be processed?

Personal data can only be processed in accordance with the law (article 5 (1) of the GDPR).

The storage of personal data is in accordance with the law if the data:

- are collected after obtaining prior consent
- are required for the fulfilment of a contract
- are required for the fulfilment of legal obligations
- are used for the protection of vital interests
- are required for the performance of public tasks
- are used for the exercise of justified interests

Penalties for non-compliance

Failure to comply with the GDPR can lead to penalties of up to 20 million euros or up to four percent of the global consolidated sales from the previous year: whichever of the two is higher.

Implications for companies that use SAP

Almost every company is affected by the GDPR, as the regulation also applies to HR solutions. ERP solutions are particularly affected in companies that maintain B2C business relationships.

In this case it is especially important that data access to personal data is strictly regulated. This applies to both master and transaction data. These data must be erased, or access more heavily restricted, once the purpose of collecting the data has been fulfilled.

All companies therefore have an obligation to review their processes, databases and data structures, as well as their access policies.

SAP's answer to the GDPR is an extended approach within SAP Information Lifecycle Management (SAP ILM).

Extended approach within SAP ILM

SAP ILM complements standard SAP systems, providing the option to manage the lifecycle of productive and archived data and documents, based on certain rules. With SAP ILM, data and documents can be stored on a certified WebDAV server (revision-proof) where they are protected from premature deletion. In addition, deletion periods for data and documents in SAP can be set and the deletion process controlled.

SAP has functionally expanded the SAP ILM interface to support the requirements of the GDPR regulations. Transaction data can be blocked by means of an archiving process and a corresponding access control. As a result, this data can also be stored following a purpose limitation process, if deletion of the data is not permitted due to higher-level laws (keyword: retention periods and GOBD [German regulation on electronic data storage and access]). Access to master data can be blocked and the processing of this data restricted using extended access rights for general access. This data can be deleted in accordance with the rules defined in SAP ILM once the legal retention period has expired.

The archive system used must support the SAP ILM WebDAV interface in order to fully support the above functions. Support of the SAP ArchiveLink® interface is not sufficient. This is an important factor to consider because only a few archive systems worldwide are certified for the use of the SAP ILM WebDAV interface. Even fewer systems are certified for the latest version of the SAP ILM interface (3.1 or 1.0 for S/4). kgs Content Server, however, is one of these few systems.

SAP ILM and SAP ArchiveLink® are two completely separate interfaces.

- ArchiveLink® is a http-based interface, that only supports a few functions, including create, store, retrieve and delete.
- SAP ILM is a WEBDAV application that enables the maintenance of file properties such as retention time, prevention of deletion, etc.

SAP states in the ILM certification process (from version 3.0 onwards) that all archives that support ILM are also certified for SAP ArchiveLink®. This is because even when ILM is used, an ArchiveLink® archive is required for unstructured documents (original documents). For each object managed using ArchiveLink®, a metadata record is kept in the ILM, which displays the properties, retention time, and if applicable, legal hold.

It is therefore necessary to run an ILM-enabled archive when using SAP ILM. kgs offers a high-performance archive specifically developed for the requirements of SAP archiving with the ILM 3.1 and ILM 1.0 certified kgs Content Server. This streamlined solution makes it possible to archive documents in accordance with legal requirements, archive data and archive print lists using the standard SAP interfaces ArchiveLink® and SAP BC ILM, and also supports SAP S/4HANA.

Specially developed for SAP archiving requirements, the kgs Content Server is a unique archive solution that meets even the highest performance requirements. Seamless integration with the SAP standard means it is no longer necessary to carry out complex rollouts of client components. It is not even necessary to leave the usual application environment e.g. for document display as the existing SAP document viewer and/or kgs Viewer can be used as a server-based solution. In addition to deep integration into the SAP landscape, as an SAP archiving system/SAP document management system, the kgs ContentServer4Storage also provides complete integration with the various storage and HSM solutions already being used by the company and can run on a range of operating systems. The available server and storage infrastructure can therefore be used and additional investments for document archiving are not necessary. The kgs Content Server is always delivered with a corporate license, which means there are no extra costs for additional users. This also ensures business planning reliability.

In combination with other kgs products, (Document Router, ZADOC, Scan, Migration, etc.), each of which can be used as independent components, the kgs Content Server forms the basis for an efficient, modern, SAP-related enterprise content management system (ECM-System)/document management system (DMS).

Summary: The latest version of SAP ILM provides an excellent technical basis for meeting the requirements of the GDPR. Certain requirements of the GDPR, such as the requirement for data minimisation in the productive system, limited access to personal data and special requirements in the interaction between deletion and retention periods make it necessary to use an archiving system.

This also gives you the opportunity to consolidate the archive landscape.

The kgs Content Server is one of the very few systems that have successfully passed the SAP BC ILM 3.1 and SAP BC ILM 1.0 certifications and can be implemented in just a few



days. kgs also provides fully automated archive migration during operation with kgs Migration.