

## Privacy Statement for SAP Concur

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Available in the following languages: [French](#), [German](#), [English](#), [Italian](#), [Spanish](#), [Chinese](#), [Japanese](#), [Korean](#)

Protecting the individual's privacy on the Internet is crucial to the future of Internet-based business and the move toward a true Internet economy. 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 ("Personal Data").

This Privacy Statement does not apply to Personal Data that SAP Concur may process in the role of processor or service provider on behalf of our customers. If you have questions about SAP Concur's processing of Personal Data in connection with providing products and services to your organization, please contact your organization.

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### A. General Information

**Who is the Data Controller?** The data controller for [www.concur.com](http://www.concur.com) is Concur Technologies UK Ltd., Objects House, Vanwall Business Park, Vanwall Road, Maidenhead, Berkshire, SL6 4UB ("SAP Concur"). The SAP Group's data protection officer can be reached at [privacy@sap.com](mailto:privacy@sap.com). You may contact the SAP Concur privacy team at any time at [Privacy-Request@Concur.com](mailto:Privacy-Request@Concur.com).

**What Personal Data does SAP Concur collect?** When you visit SAP Concur's websites, SAP Concur stores certain information about your browser, the operating system, and your IP address. If you interact with SAP Concur by submitting a registration form for an event, requesting information about goods and services, completing a questionnaire, participating in a contest, or engaging with SAP Concur in similar sales and marketing activities, SAP Concur will collect the information you provide to SAP Concur, which may consist of your first and last name, email addresses, telephone numbers, location (country, state/province, city), company name, job title/role,

department and function, current relationship to SAP, and your company's industry. If you provide a credit card number or bank details to order goods or services from SAP Concur, then SAP Concur will collect this information to process your payment for the requested goods or services.

**Why does SAP Concur need your Personal Data?** SAP Concur requires your Personal Data to provide you with access to this site; to deliver any ordered goods or services; and to comply with statutory obligations, including checks required by applicable export laws. Further information on why SAP Concur needs your Personal Data can be found in Section B, below, if SAP Concur's use of your Personal Data is based on a statutory permission. Further information on why SAP Concur needs your Personal Data can be found in Section C, below, if SAP Concur's use of your Personal Data is based on your consent. If SAP Concur's use of your Personal Data is based on consent, note that the information in this Privacy Statement on respective consent statements for certain types of Personal Data uses can also be found in the SAP Concur Preference Center. As a general matter and although providing Personal Data is voluntary, SAP Concur may not be able to perform or satisfy your request without it; for example, SAP Concur might require your Personal Data to process an order you place, or to provide you with access to a web offering that you requested. In these cases, it is not possible for SAP Concur to satisfy your request without certain Personal Data.

Kindly note that you can order goods or services without providing a consent into SAP Concur's further marketing operations.

**From What Types of Third Parties does SAP Concur obtain Personal Data?** In most cases, SAP Concur collects Personal Data from you. SAP Concur might also obtain Personal Data from third parties, if the applicable national law allows SAP Concur to do so. SAP Concur will treat this Personal Data according to this Privacy Statement, plus any additional restrictions imposed by the third party that provided SAP Concur with it or the applicable national law. These third-party sources include:

- SAP and/or [SAP Group's](#) business dealings with your employer
- Third parties you directed to share your Personal Data with SAP Concur

**How long will SAP Concur store my Personal Data?** SAP Concur will only store your Personal Data for as long as it is required:

- to make goods and services requested available to you;
- for SAP Concur to comply with its statutory obligations resulting from applicable export laws;
- until you object against such use by SAP Concur, if SAP Concur's use of your Personal Data is based on SAP Concur's legitimate business interest as further stated in this Privacy Statement;

- until you revoke your consent granted in this Privacy Statement, if SAP Concur is processing your Personal Data based on your consent;
- to fulfill the purposes outlined in this Privacy Statement.

SAP Concur will also retain your Personal Data for additional periods if it is required by mandatory law to retain your Personal Data longer or where your Personal Data is required for SAP Concur to assert or defend against legal claims, SAP Concur 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:

- companies within the [SAP Group](#)
- third party vendors and service providers as necessary to provide services to SAP Concur but not for their own promotional or business purposes

As part of a global group of companies operating internationally, SAP Concur has affiliates (the “[SAP Group](#)”) and third-party service providers outside of the European Economic Area (the “EEA”) 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 Concur 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 Concur: access at any time to information about which Personal Data SAP Concur processes about you and the correction or deletion of such Personal Data. Please note, however, that SAP Concur can or will delete your Personal Data only if there is no statutory obligation or prevailing right of SAP Concur to retain it. Kindly note further that if you request that SAP Concur deletes your Personal Data, you will not be able to continue to use any SAP Concur service that requires SAP Concur’s use of your Personal Data.

If SAP Concur uses your Personal Data based on your consent or to perform a contract with you, you can further request from SAP Concur a copy of the Personal Data that you have provided to SAP Concur. 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 Concur will carefully consider your request and discuss with you how it can best fulfill it.

Furthermore, you can request from SAP Concur that SAP Concur restricts your Personal Data from any further processing in any of the following events: (i) you state that the Personal Data SAP Concur has about you is incorrect, subject to the time SAP Concur requires to check the accuracy of the relevant Personal Data, (ii) there is no legal basis for SAP Concur processing your Personal Data and you demand that SAP Concur restricts your Personal Data from further processing, (iii) SAP Concur no longer requires your Personal Data but you state that you require SAP Concur to retain such data in order to claim or exercise legal rights or to defend against third party claims, or (iv) in case you object to the processing of your Personal Data by SAP Concur based on SAP Concur's legitimate interest (as further set out below), subject to the time required for SAP Concur to determine whether it has a prevailing interest or legal obligation in processing your Personal Data.

For individuals within the State of California, you instead have the right:

- to request from SAP Concur access to your Personal Data that SAP Concur collects, uses, discloses, or sells (if applicable) about you;
- to request that SAP Concur delete Personal Data about you;
- to non-discriminatory treatment for exercise of any of your data protection rights;
- in case of request from SAP Concur 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; and
- to opt-out of the sale of Personal Data. In accordance with the disclosure requirements under the California Consumer Privacy Act ("CCPA"), SAP Concur is exempt from providing a notice to opt-out because it does not and will not sell your Personal Data.

Please note, however, that SAP Concur can or will delete your Personal Data only if there is no statutory obligation or prevailing right of SAP Concur to retain it. Kindly note further that if you request that SAP Concur deletes your Personal Data, you will not be able to continue to use any SAP Concur service that requires SAP Concur's use of your Personal Data.

**How can you exercise your data protection rights?** Please direct any requests to exercise your rights to SAP's group data protection officer may be contacted at [Privacy@sap.com](mailto:Privacy@sap.com), or you may contact the SAP Concur privacy team at any time at [Privacy-Request@Concur.com](mailto:Privacy-Request@Concur.com).

For individuals within the State of California, you may also designate an authorized agent to submit requests to exercise your data protection rights to SAP Concur. 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.

**How will SAP Concur verify requests to exercise data protection rights?** SAP Concur 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 Concur will match Personal Data provided by you in submitting a request to exercise your rights with information already maintained by SAP Concur. 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 Concur.

In accordance with the verification process set forth in the CCPA, SAP Concur 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 Concur must request additional information from you outside of information that is already maintained by SAP Concur, SAP Concur will only use it to verify your identity so you can exercise your data protection rights, or for security and fraud-prevention purposes.

SAP Concur 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 Concur 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 Concur has its registered seat.

### **Can I use SAP Concur's services if I am a minor?**

**Children.** In general, SAP Concur websites and online services are not directed to users below the age of 16 years, or equivalent minimum age in the relevant jurisdiction. If you are younger than 16 or the equivalent minimum age in the relevant jurisdiction, you cannot register with and use this website or online services.

**U.S. Children's Privacy.** SAP Concur does not knowingly collect the Personal Data of children under the age of 13. If you are a parent or guardian and believe SAP Concur collected information about a child, please contact SAP Concur as described in this Privacy Statement. SAP Concur will take steps to delete the information as soon as possible. Given that SAP Concur websites and online services are not directed to users under 16 years of age and in accordance with the disclosure requirements of the CCPA, SAP Concur does not sell the Personal Data of any minors under 16 years of age.

## **B. Processing based on a statutory permission**

**Why does SAP Concur need to use my Personal Data and on what legal basis is SAP Concur using it?**

**Processing to fulfill contractual obligation.** SAP Concur requires your Personal Data to deliver goods or services you order under a contract SAP Concur has with you, to establish a contract for goods or services between you and SAP Concur, and to send you invoices for ordered goods or services. SAP Concur processes Personal Data to fulfill contractual obligations pursuant to Article 6(1) lit. b GDPR or the equivalent article under other national laws, when applicable.

Processing when necessary to fulfill SAP Concur's contractual obligation includes responding to your related inquiries and providing you with shipping and billing information and to processing your feedback or to provide you with access to the SAP Concur customer support systems, provide support services to you and enable you to download content from the SAP Concur customer support systems. This may also include conversation data that you may trigger via the chat functionalities on SAP Concur's sites, contact forms, emails, or telephone. In this Privacy Statement, "goods and services" includes access to SAP Concur's web services, offerings, contests, sweepstakes, other content, customer support services, non-marketing related newsletters, whitepapers, tutorials, trainings and events.

Furthermore, SAP Concur communicates on a regular basis by email with users who subscribe to its services and will also communicate by phone to resolve your or other customer complaints or to investigate suspicious transactions. SAP Concur will use your email address to confirm your opening of an account, to send you notice of payments, to send you information about changes to its products and services, and to send notices and other disclosures as required by law. Generally, users cannot opt out of these communications because these communications are required for relevant business relationships and not marketing-related in nature.

For marketing-related communications such as emails and phone calls, SAP Concur will (i) only provide you with such information after you have opted in, if legally required, and (ii) provide you the opportunity to opt out if you do not want to receive further marketing-related communications. You can also opt out of marketing-related communications at any time by updating your preferences within the SAP Concur Preference Center or, for users of the SAP Business Exchange, settings in the user's profile.

**Processing to ensure compliance.** SAP Concur and its products, technologies, and services are subject to the export laws of various countries including, without limitation, those of the European Union and its member states, and of the United States of America. You acknowledge that, pursuant to the applicable export laws, trade sanctions, and embargoes issued by these countries, SAP Concur is required to take measures to prevent entities, organizations, and parties listed on government-issued sanctioned-party lists from accessing certain products, technologies, and services through SAP Concur's websites or other delivery channels controlled by SAP Concur. This could include (i) automated checks of any user registration data as set out herein and other information a user provides about his or her identity against applicable sanctioned-party lists; (ii) regular repetition of such checks whenever a sanctioned-party list is updated or when a user updates his or her information; (iii) blocking of access to

SAP Concur's services and systems in case of a potential match; and (iv) contacting a user to confirm his or her identity in case of a potential match. Any such use of your Personal Data is based on the permission to process Personal Data in order to comply with statutory obligations (Article 6 para. 1 lit. c GDPR) and SAP Concur's legitimate interest (Article 6 para. 1 lit. f GDPR) or the equivalent articles under other national laws, when applicable.

Furthermore, you acknowledge that any information required to track your data protection and privacy choices for processing of your Personal Data, or whether you have expressly consented to or opted out of receiving marketing materials depending on the country in which the relevant [SAP Group](#) company operates, may be stored and exchanged between members of the [SAP Group](#) as required to ensure compliance.

**Processing based on SAP Concur's legitimate interest.** SAP Concur can use your Personal Data based on its legitimate interest (Article 6 para. 1 lit. f GDPR) or the equivalent article under other national laws, when applicable as follows:

- **Fraud and Legal Claims.** If required, SAP Concur will use your Personal Data for the purposes of preventing or prosecuting criminal activities such as fraud and to assert or defend against legal claims.
- **Questionnaires and survey.** SAP Concur could invite you to participate in questionnaires, surveys, or similar feedback tools. These questionnaires, surveys and tools will be generally designed in a way that they can be answered without any data that can be used to identify you. If you nonetheless enter such data in response, SAP Concur will use this personal data to improve its products and services and may combine the information you provide with other personal data about you that SAP Concur may have, including other surveys or feedback you provide.
- **Contract Performance.** If you purchase or intend to purchase goods or services from SAP Concur on behalf of a corporate customer or are otherwise designated as a contact person for the business relationship between a corporate customer (a "Customer Contact") and SAP Concur, SAP Concur will use your Personal Data for this purpose. This includes, for the avoidance of doubt, such steps which are required for establishing the relevant business relationship. In case that an existing Customer Contact informs SAP Concur that you are their replacement, SAP Concur will, from the point in time of such notification, consider you to be the relevant Customer Contact for the respective customer until you object as further set out below.
- **Creation of anonymized data sets.** SAP Concur may anonymize Personal Data provided under this Privacy Statement to create anonymized data sets, which can then be used to improve its and its affiliates' products and services.
- **Personalized Communications.** If you opt-in to receive marketing communications such as newsletters or updates from SAP Concur, SAP Concur will collect and store details of how you interact with these communications to

help create, develop, operate, deliver and improve our communications with you. This information is aggregated and used to help SAP Concur provide more useful information and to understand what is of most interest.

- **Recordings for quality improvement purposes.** In case of telephone calls or chat sessions, SAP Concur will record such calls (after informing you accordingly during that call and before the recording starts) or chat sessions in order to improve the quality of SAP Concur's services and develop new products or functionalities.
- **To keep you up-to-date or request feedback.** Within an existing business relationship between you and SAP Concur, SAP Concur might inform you, where permitted in accordance with local laws, about its products or services (including webinars, seminars or events) which are similar or relate to such products and services you have already purchased or used from SAP Concur. Furthermore, where you have attended a webinar, seminar or event of SAP Concur or purchased products or services from SAP Concur, SAP Concur might contact you for feedback regarding the improvement of the relevant webinar, seminar, event, product or service.

**Right to Object.** You can at any time object to SAP Concur's use of your Personal Data as set forth in this section by updating your preferences within the SAP Concur Preference Center or, for users of the SAP Business Exchange, settings in the user's profile; or SAP's group data protection officer may be contacted at [Privacy@sap.com](mailto:Privacy@sap.com), or you may contact the SAP Concur privacy team at any time at [Privacy-Request@Concur.com](mailto:Privacy-Request@Concur.com). In this case, SAP Concur will carefully review your objection and cease further use of the relevant information, subject to SAP Concur's compelling legitimate grounds for continued use of the information, which override your interest in objecting, or if SAP Concur requires the information for the establishment, exercise or defense of legal claims.

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

- to plan and host events
- to host online forums or webinars
- for marketing purposes such as to keep you updated on SAP Concur's latest products and services and upcoming events
- to contact you to discuss further your interest in SAP Concur services and offerings
- to help SAP Concur create, develop, operate, deliver and improve SAP Concur services, products, content and advertising
- to provide more personalized information to you



- for loss prevention
- for account and network security purposes
- for internal purposes such as auditing, analysis, and research to improve SAP Concur's products or services
- to verify your identity and determine appropriate services
- to assert or defend against legal claims
- detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- debugging to identify and repair errors that impair existing intended functionality
- Short-term, transient use, provided the personal information is not disclosed to a third party and is not used to build a profile about you or otherwise alter your individual experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by SAP Concur

### C. Processing based on consent

In the following cases, SAP Concur will process your Personal Data if you granted prior consent to the specific proposed processing of your Personal Data (Article 6(1) lit. a GDPR).

**News about SAP Concur's Products and Services.** Subject to a respective provision and your consent, SAP Concur may use your name, email and postal address, telephone number, job title and basic information about your employer (name, address, and industry) as well as an interaction profile based on prior interactions with SAP Concur (prior purchases, participation in webinars, seminars, or events or the use of (web) services - further details on this topic can be found in the [Cookie Statement](#) displayed on the relevant SAP Concur website) in order to keep you up to date on the latest product announcements, software updates, software upgrades, special offers, and other information about SAP Concur's software and services (including marketing-related communications) as well as events of SAP Concur and in order to display relevant content on SAP Concur's websites. In connection with these marketing-related activities, SAP Concur may provide a hashed user ID to third party operated social networks or other web offerings (such as Twitter, LinkedIn, Facebook, Instagram or Google) where this information is then matched against the social networks' data or the web offerings' own data bases in order to display to you more relevant information.

**Creating user profiles.** SAP Concur offers you the option to use its web offerings including forums, blogs, and networks (such as the SAP Concur Community) linked to this website that require you to register and create a user profile. User profiles provide the option to display personal information about you to other users, including but not limited to your name, photo, social media accounts, postal or email address, or both, telephone number, personal interests, skills, and basic information about your company.

These profiles may relate to a single web offering of SAP Concur or may also allow you to access other web offerings of SAP Concur or of other entities of the [SAP Group](#), or both (irrespective of any consent granted under the section “Forwarding your Personal Data to other SAP companies.” below). It is, however, always your choice which of these additional web offerings you use, and your Personal Data is only forwarded to them once you initially access them. Kindly note that without your consent for SAP Concur to create such user profiles SAP Concur will not be in a position to offer such services to you where your consent is a statutory requirement that SAP Concur can provide these services to you.

Within any web offering, beyond the mere provision of access your profile is used to personalize interaction with other users (for example, by way of messaging or follow functionality) and by SAP Concur to foster the quality of communication and collaboration through such offerings and for SAP Concur to provide gamification elements (gamification is the process of taking something that already exists, such as a website, an enterprise application, or an online community, and integrating game mechanics into it to motivate participation, engagement, and loyalty). To the greatest extent supported by the relevant web offering, you can use the functionality of the relevant web offering to determine which information you want to share.

**Special categories of Personal Data.** In connection with the registration for and provision of access to an event or seminar, SAP Concur 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 Concur will not be able to take any respective precautions.

**Event profiling.** If you register for an event, seminar, or webinar of SAP Concur, SAP Concur 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 Concur may transfer your Personal Data to other entities in the SAP Group. The current list of SAP Group entities can be found [here](#). 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 Concur may share your contact information with sponsors, co-sponsors and/or exhibitors of events and/or conferences organized and hosted by SAP Concur (e.g., SAP Concur Fusion) and other identified business partners of SAP Concur that may use your Personal Data pursuant to their respective privacy policies.

**Revocation of a consent granted hereunder.** You may at any time withdraw a consent granted hereunder. Certain consents may be withdrawn by updating your preferences within the SAP Concur Preference Center or, for users of the SAP Business Exchange, settings in the user's profile. Otherwise, you may contact the SAP Concur privacy team at any time at [Privacy-Request@Concur.com](mailto:Privacy-Request@Concur.com). In case of withdrawal, SAP Concur will not process Personal Data subject to this consent any longer unless legally required to do so. In case SAP Concur is required to retain your Personal Data for legal reasons your Personal Data will be restricted from further processing and only retained for the term required by law. However, any withdrawal has no effect on past processing of personal data by SAP Concur up to the point in time of your withdrawal. Furthermore, if your use of an SAP Concur offering requires your prior consent, SAP Concur will not be (any longer) able to provide the relevant service (or services, if you revoke the consent for SAP Concur to use your profile under the SAP Cloud Platform Identity Authentication Service for multiple SAP Concur offerings), offer or event to you after your revocation.

#### D. Cookies and Similar Tools

Information gathered by cookies or similar technologies, and any use of such information, is further described in SAP Concur's [Cookie Statement](#). You can exercise your cookie preferences as outlined in SAP Concur's [Cookie Statement](#).

#### E. Additional Country Specific Provisions

Where SAP Concur is subject to U.S. privacy requirements, the following also applies: Do Not Track. Your browser may allow you to set a "Do not track" preference. Unless otherwise stated, our sites do not honor "Do not track" requests. However, you may elect not to accept cookies by changing the designated settings on your web browser or, where available, by referring to our [Cookie Statement](#). Cookies are small text files placed on your computer while visiting certain sites on the Internet used to identify your computer. Please note that if you do not accept cookies, you may not be able to use certain functions and features of our site. This site does not allow third parties to gather information about you over time and across sites.

#### F. Social Media Channels

**General.** This General Information section applies to Personal Data that you provide to a social media provider's ("Social Media Provider") platform when you follow one of SAP Concur's accounts on the social media platform (such account is referred to as a "Social Media Channel"), or which is derived from the Personal Data as outlined below. The

information in this section supplements information in the Privacy Statement, and in the event of any conflict between this section and the remainder of the Privacy Statement, this section will control.

**Personal Data Collected.** If you follow the Social Media Channel, SAP Concur will access and process your social media posts and profile information, including your time zone and language, when you created your account on the Social Media Provider's platform, and certain information about your posts like date and time. SAP Concur requires your Personal Data to provide you with access to the Social Media Channel. Although providing Personal Data is voluntary, without your Personal Data SAP Concur cannot provide you with access to the Social Media Channel.

**Personal Data from Third Parties.** In most cases SAP Concur collects Personal Data from you through Social Media Channels. SAP Concur might also obtain Personal Data from a third party such as a service provider to SAP Concur, if the applicable national law allows SAP Concur to do so. These third-party sources include SAP group entities' business dealings with you and third parties you directed to share your Personal Data with SAP Concur.

**Sprinklr.** SAP Concur engages Sprinklr as a third party service provider. Sprinklr uses standard integration APIs provided by a Social Media Provider to collect, aggregate, and analyze the contributions and activities associated with the Social Media Channel on that Social Media Provider's platform. This can include the content and actions you contribute to the Social Media Provider's platform. This information is used by Sprinklr to create reports that it provides to SAP Concur on an aggregated basis. Such reports can include specific information like your username or a personal identifier; however, this is only the case when you directly comment on content that SAP Concur publishes in its Social Media Channel, you @mention an Social Media Channel, or you post content associated with SAP Concur products and themes that are monitored by Sprinklr. SAP Concur uses these reports to better understand public sentiment around SAP Concur's products and services and to improve its offerings. Sprinklr may also receive information from the Social Media Provider as well. For further details on the information a Social Media Provider makes available to Sprinklr, please visit the Social Media Provider's privacy statement. You can restrict Sprinklr's ability to collect information as described in this section by following the instructions in the Social Media Provider's privacy statement.

**Certain processing based on SAP Concur's legitimate interest.** In order to protect the SAP Concur brand, SAP Concur monitors Social Media Channels, including but not limited to Twitter, Facebook, and LinkedIn for activity that presents immediate or potential risk to SAP Concur or its employees. In doing so, SAP Concur may access the data for individual accounts on the Social Media Provider's platform, including username, public profile, public comments, @mentions, shares, and replies. SAP Concur may respond directly to you to gather additional information, to address your concerns, or to request other action that may mitigate the risk to SAP Concur or SAP Concur employees.

You can at any time object to SAP Concur's use of your Personal Data as set forth in this section by either accessing and configuring your privacy controls on the Social Media Provider's platform or by unfollowing the Social Media Channel. If you elect either of these options to object, SAP Concur will: (i) cease using your Personal Data based on its legitimate interest to process Personal Data for the above purposes, (ii) remove it from its systems, unless SAP Concur is permitted to use such Personal Data for another purpose set forth in this Privacy Statement, or (iii) continue to process your Personal Data if SAP Concur determines and demonstrates a compelling legitimate interest to do so.

**Facebook.** The information in this section concerns the processing of Personal Data via SAP Concur's fan pages on Facebook (hereinafter "SAP Concur Facebook page") and about your additional rights in this context.

- **Data Controller.** For the processing of Personal Data for [Page Insights](#) ("Insights Data"), SAP Concur and Facebook Ireland Limited ("Facebook Ireland") are joint controllers according to Article 26 (1) GDPR. The [Page Insights Controller Addendum](#) applies to the processing of Insights Data and this joint controllership arrangement. Facebook Ireland makes this Page Insights Controller Addendum available to you pursuant to Article 26 (2) GDPR. This is accomplished via the [Information about Page Insights](#) data, which currently is accessible from all pages on Facebook. Facebook Ireland is responsible for the collection and further processing of your Personal Data on Facebook's platform. Facebook collects and processes certain information about your visit to SAP Concur's Facebook fan page even if you do not have an account with Facebook and even if you are not logged into Facebook at the time of your visit to SAP Concur's Facebook fan page. For more information on how Facebook processes your Personal Data, please refer to [Facebook's Privacy Policy](#) and [Facebook's Cookie Policy](#).
- **Contacting Facebook.** You can reach Facebook Ireland Limited at 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland ("Facebook Ireland") and its Data Protection Officer can be reached at <https://www.facebook.com/help/contact/540977946302970>.
- **Personal Data Collected.** SAP Concur collects the Personal Data you make available on your Facebook profile as set forth below. While you are not legally or contractually obliged to make your Personal Data available to SAP Concur, certain functionality of SAP Concur's fan pages on Facebook may vary depending on the availability of your Personal Data. This can result in either unavailability or limited capability of certain functions when you do not make your Personal Data available. SAP Concur processes your data, some of which may be Personal Data, on the SAP Concur Facebook page in the following ways:
  - Your public profile information when you interact with the SAP Concur Facebook page. SAP Concur will access the information based on the settings you exercise in your Facebook profile.

- Your name and the content of your messages, inquiries or other postings when you contact SAP Concur via SAP Concur's Facebook page. SAP Concur processes this data for the purpose of handling and, if applicable, responding to your postings.
- Your interactions with the SAP Concur Facebook page when you upload a post, enter your Personal Data via a post or through the comment function under a post, or contact SAP Concur via Messenger and provide SAP Concur with your Personal Data.
- When you interact with the SAP Concur Facebook page, Facebook uses your data to gather statistics on SAP Concur's Facebook page usage. Facebook then provides SAP Concur with "Page Insights data", which is information in aggregated statistical form that SAP Concur uses to evaluate the quality of SAP Concur's Facebook page and its content. SAP Concur does not access this usage data.
- For more information on Facebook's processing of Insights data when you interact with SAP Concur's Facebook page, please see: [https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data).
- **Processing by SAP Concur Based on Legitimate Interest.** SAP Concur's processing activities based on SAP Concur's legitimate interest are to recognize and adapt the content of SAP Concur's Facebook page to the interests and preferences of its visitors (for e.g., number of followers, number of visits to individual page areas, user statistics according to age, geography and language) and to increase SAP Concur's Facebook page visibility.
- **Processing by Facebook.** The Personal Data collected when you visit SAP Concur's Facebook fan page is processed by Facebook and may be transferred to countries outside the EEA. More information about how Facebook processes Personal Data can be found here: [Facebook's Privacy Policy](#).
- **Exercise of Certain Rights.** Facebook Ireland is responsible to provide you with information about its processing for Page Insights and to enable you to exercise your rights under the GDPR. Learn more about these rights in your Facebook [settings](#). To exercise these rights with respect to data processing by Facebook, please contact Facebook at <https://www.facebook.com/help/contact/308592359910928>. You can also reach SAP Concur via email at [privacy@sap.com](mailto:privacy@sap.com). You also have the right to lodge a complaint with a supervisory authority.

**Twitter.** The information in the following section concerns the processing of your Personal Data via SAP Concur's Twitter accounts (hereinafter "SAP Concur Twitter Account") and about your additional rights in this context.

- **Data Controller.** For SAP Concur's Twitter Account, SAP Concur uses the services of Twitter Inc, 1355 Market Street, Suite 900, San Francisco, CA 94103

U.S.A. (“Twitter”). Twitter sets forth the following data controllers for its services in its [Privacy Policy](#): (i) if you live in a country outside of the European Union or the European Economic Area, the data controller responsible for your Personal Data is Twitter, Inc. and can be reached at Twitter, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103; and (ii) if you live in the European Union or European Economic Area, the data controller responsible for your Personal Data is Twitter International Company and can be reached at Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 IRELAND.

- **Personal Data Collected.** As set forth in Twitter’s Privacy Policy, your use of Twitter’s short message service and other functionality that it makes available to you is your responsibility. This particularly applies to your use of the interactive functions Twitter offers such as share or rate. Further information about what data Twitter processes, the legal mechanism for data transfers, and for what purposes Twitter processes data can be found in Twitter’s Privacy Policy located here: <https://twitter.com/en/privacy>. SAP Concur cannot influence the type and scope of Twitter’s data collection and processing, or Twitter’s transfer of data to third parties. SAP Concur does not have any control in this respect. When you use Twitter, your Personal Data is processed by Twitter and, regardless of your residence, is transferred, stored and used in the United States, Ireland, and in any other country where Twitter Inc. does business. You can limit the processing of your data in the general settings of your Twitter account. In addition, you can restrict Twitter access to your data like contact and calendar data, photos, and location data on mobile devices (smartphones, tablet computers) in the respective settings. However, this is dependent on the operating system used.
  - Twitter collects data that you voluntarily enter such as your name and user name, e-mail address, telephone number or the contacts in your address book when you upload or synchronize it.
  - Twitter also evaluates the content you share to determine what topics you are interested in, stores and processes confidential messages that you send directly to other users, and has the ability to use GPS data to determine your location, wireless network information, and your IP address to send you advertising or other content. Twitter may also use analysis tools for its evaluation purposes. SAP Concur cannot control or influence Twitter’s use of such tools and Twitter has not informed SAP Concur about such potential use. If tools of this kind are used by Twitter for SAP Concur’s Twitter Account, such tools are used without direction from SAP Concur or approval or support from SAP Concur, and data obtained from such tools and subsequent analysis are not available to SAP Concur. SAP Concur can only access certain non-personal information about Tweet activity like the number of profile or link clicks through a particular Tweet through SAP Concur’s Twitter Account. Furthermore, Twitter does not provide SAP Concur with a means to prevent or disable the use of such tools on SAP Concur’s Twitter Account.

- Twitter also receives data when you view content, even if you do not have an account on Twitter. This type of "log data" could include your IP address, browser type, operating system, information about the website and pages you previously visited, your location, your mobile operator, your device (including device ID and application ID), the search terms you used, and cookie information. Twitter buttons or widgets embedded in web pages and the use of cookies enable Twitter to track your visits to these web pages and associate them with your Twitter profile. This data can be used to offer content or advertising tailored to you.
- **Processing by SAP Concur Based on Legitimate Interest.** Although SAP Concur itself does not collect data on its SAP Concur Twitter Account, the data you enter on Twitter like your user name and the content you publish will be processed by SAP Concur if SAP Concur retweets or replies to your tweets, if applicable, or if SAP Concur writes tweets that refer to your account. The data that you publish and distribute on Twitter is also included by SAP Concur in its offer and made available to its followers. SAP Concur will recognize and adapt the content of SAP Concur's Twitter Accounts to the interests and preferences of its visitors and to increase SAP Concur's page visibility on Twitter accounts.
- **Processing by Twitter.** Twitter is the recipient of your Personal Data and is responsible for it, as well as where it may be passed on to third parties for their own purposes. For more information on Twitter's privacy practices and data processing, see their privacy statement at <https://twitter.com/en/privacy>.