Adobe Creative Cloud

Part 1	
Resource Type (Digital or Application)	Application
Application/Software Title (with links)	Adobe Creative Cloud
Developer/Vendor	Adobe
Privacy Policy, Terms of Use (Links)	Adobe Privacy Center https://www.adobe.com/ca/privacy/policy.html
Description of Application and its Educational Value (Refer to "About Us" page, if applicable) *What is the initiative? Describe your initiative in enough detail that a reader who knows nothing about your work will understand the purpose of your initiative and who your partners and other stakeholders are. Describe what you're doing, how it works, who is involved and when or how long your initiative runs.*	**Adobe Creative Cloud** is a suite of industry-standard creative applications—such as Photoshop, Illustrator, Premiere Pro—designed to support student learning in digital media, visual arts, communication, and STEM. It helps students and teachers develop digital literacy and creativity through hands-on projects and integration with classroom tools.
Part 2	
Is this initiative a data-linking program under FOIPPA? *If yes, this PPIA must be submitted to the Office of the Information and Privacy Commissioner (OIPC). A data linking program is when multiple distinct data sets are used in conjunction with each other. (E.g. MyED information used in School Messenger)*	No
Is this initiative a common or integrated program or activity (CIPA)? *If yes, this PPIA must be submitted to the Office of the Information and Privacy Commissioner (OIPC). A CIPA is a program or activity that provides one or more services through a public body either working collaboratively or on behalf of other public bodies or agencies.*	No

What Personal Information (PI) is involved?
List all the PI elements that will be collected, used, and/or stored through the use of this app by (but not limited to): students, staff, parents, and vendors, even unintentionally. If the answer is 'none', then skip to PART 5 and submit this PPIA to the Privacy Officer for completion.
	*** Students will not have their personal information collected when using the application on district devices. However, if they decide to create an account online, some personal information will be collected, used, or stored. ***
	
	• Identifying Information
	    o Full Name
	    o Email address
	    o Telephone number
	    o Mailing address
	    o Username and password
	    o Date of birth (e.g., for student verification)
	    o School or organizational affiliation
	    o Job title or role

	• Device Info (IP address, OS, browser type and settings, Mobile device ID, device model & manufacturer) • Content & media (uploaded/created documents, images, audio, video, metadata files, comments or posts made in forums) • Payment & billing information (credit/debit card details, billing address, purchase history, subscription data)
Use *What is the PI used for (purpose)?* *Will the PI be used to make decisions that directly affect individuals? Does the vendor/provider use collected PI for other purposes, e.g., to advertise its services to students, teachers or parents?*	• Adobe uses personal information (PI) to deliver and improve its services, verify user eligibility (e.g., student/teacher status), provide support, and personalize user experiences • PI may be used to make decisions that directly affect individuals, such as granting access, customizing features, or enforcing terms based on usage and account data. • Adobe also uses PI for advertising, including sending promotional offers and tailoring ads to users like students, teachers, or parents based on behavior and preferences
Disclosure *Who will/might access the PI?* *How might the vendor/provider share the collected PI? What disclosure to 3rd parties might occur (which 3rd parties) and the type of PI being disclosed/shared. How might disclosed PI be used (see above)?*	• Adobe may share PI with affiliated companies, advertising and sales partners, and third-party service providers who process data on Adobe's behalf. This includes identifiers (e.g., name, email), device data, and usage analytics. • PI may be disclosed to data brokers, aggregators, professional networks, and public sources for purposes like fraud detection, security, and personalization. Adobe also shares PI when legally required. • Shared PI can be used for targeted advertising, service improvement, security monitoring, and legal compliance. Adobe maintains contracts to restrict how third parties use and disclose this data.
Security *Describe the measures put in place, including those implemented internally and by the provider, to secure the PI and to prevent unauthorized access to the PI. Describe the technical and physical measures in place to protect the PI.*	Adobe Creative Cloud protects PI with multiple security measures. It encrypts data in transit and at rest, manages access controls through the Enterprise Dashboard, and requires strong passwords with multi-factor authentication. Adobe also restricts access to data centers, uses surveillance cameras, and conducts quarterly access reviews to prevent unauthorized entry.
Part 3	
Will any PI be stored outside Canada? *Yes or No. If No, skip to PART 4*	Yes

Is any of the PI 'sensitive'? *Click on link above to determine if PI is considered sensitive*	Yes
Where is the PI being stored? *Where, what regions are the PI being stored in, including backups. What hosting providers are being used?*	Adobe stores PI on servers located in various countries, including the United States and Ireland. If you're in North America, your data is typically handled by Adobe Inc. (U.S.); outside North America, Adobe Systems Software Ireland Limited is the data controller. While data may be stored outside Canada, Adobe implements safeguards to comply with Canadian privacy laws like PIPEDA, including encryption, access controls, and contractual protections.
Part 4	
Ownership and Retention of PI *Who owns the PI, according to applicable contracts/agreements. Describe the provisions, controls and guarantees in place on the retention of PI: storage before expiry, backups, destruction/deletion of PI*	**Ownership**: Adobe acts as the data controller when providing services directly to individuals (e.g., students, teachers, staff). **Retention, Storage & Backups**: PI is stored on Adobe's servers, which may be located outside Canada, including in the U.S. and Ireland. Adobe uses encryption, access controls, and contractual safeguards to protect stored data. Deleted files in Creative Cloud are retained for 30 days in the "Deleted" folder before permanent removal. For inactive free accounts, files may be deleted after 18 months of inactivity. **Destruction & deletion:** Users can delete their Adobe accounts, which permanently removes their PI and cloud-stored content. Adobe may also delete data once it exceeds the retention period defined by contract or policy.
Accuracy of PI *Describe the provisions that allow individuals to request corrections to their PI held within the application/service*	• Users can log in to their Adobe account profile to update their personal information. • Adobe allows individuals to submit privacy inquiries or correction requests through its Privacy Inquiry Form.
Part 5	
Recommendation *Recommendation for **Approval, Abeyance/Suspension** (pending further review) or **Rejection**, based on a review and assessment of Privacy Risk. For an approval, provide any applicable conditions of use and/or other risk mitigation measures advised to achieve an acceptable level of privacy risk*	Approved.
PIA Version	1.0
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