

Last updated: 14 February 2024

## **COPPA Direct Notice for Adobe Student Services**

This is Adobe's notice under the Children's Online Privacy Protection Act ("COPPA") and contains information about Adobe's collection, use, and disclosure of personal information collected from Students under age 13 who use Adobe products and services provided to Students in the K-12 (primary and secondary) school environment. These products include Adobe Express and Creative Cloud All Apps (the "Student Services"). See [here](#) for more information about the Student Services. This COPPA notice does not apply to users aged 13 or older who use Adobe's services, such as classroom teachers.

In this notice, "School" refers to a primary or secondary educational institution (or a district of primary or secondary schools) meeting the eligibility requirements located at [www.adobe.com/go/primary-secondary-institution-eligibility-guidelines](http://www.adobe.com/go/primary-secondary-institution-eligibility-guidelines), while "Student" refers to a child user under the age of 13 enrolled at a School.

### **What Student Data is Collected?**

In this notice, "Student Data" means any information considered "personal information" under COPPA that is collected from Students through the Student Services. The Student Services help Students communicate their ideas in creative and engaging ways. Students may use the Student Services to create digital assets such as edited videos, photos, and webpages. To provide the Student Services, Adobe may collect login credentials (e.g., name and email address of the Student), analytics data including product usage data, and content created by Students through the use of the Student Services, which could include photographs or voice recordings ("Student Assets"). Adobe may also collect IP address, an Adobe ID, mobile device IDs, and other information that is collected automatically through a Student's use of the Student Services.

### **How Does Adobe Use the Student Data?**

**Permitted Uses of Student Data.** Adobe may use Student Data collected through the Student Services: (i) for providing the Student Services; (ii) for maintaining, supporting, enhancing, evaluating, analyzing, diagnosing, improving and developing the Student Services, as permitted by law, including to respond to customer service and technical support requests; (iii) for enforcing its rights; (iv) as requested or permitted with consent of the School; (v) to tailor the content or experience of Students; or (vi) as otherwise authorized by applicable law. Except as noted above, Adobe does not use Student Data collected through the Student Services for its own commercial purposes.

**Use of De-Identified Data.** Adobe may use de-identified data, including aggregated data, for any lawful purpose, including, but not limited to, the development, research, and improvement of its sites, services, or applications, and to demonstrate the effectiveness of the Student Services.

**Student Data Retention and Deletion.** Schools may delete or remove Student Data from the Student Services through use of the Admin Console when such Student Data is no longer needed for an educational purpose. Adobe will delete Student Data when such Student Data is no longer needed for the purpose for which it was obtained. For example, upon termination of the agreement between the School and Adobe, Adobe will retain Student Data for a reasonable period of time to permit Students to download and store Student Assets in a personal account before it is deleted.

### **How Does Adobe Share Student Data?**

**Permitted Disclosures.** Adobe will not disclose Student Data except with the consent or at the direction of the School. Depending on the features and functionality of the Student Service, Students may be able to publicly share Student Data or post Student Data in a public forum. School officials should use caution when adjusting permissions and feature access through the Admin Console to ensure such permissions and features are configured appropriately for educational purposes.

Adobe may also transfer Student Data if it is acquired by or merged with another company, or if all or a portion of its assets are transferred to another company, as part of the transfer of the business.

### **What Rights Does Adobe Offer for Student Data?**

**Rights to Access, Correct, Delete, and Control Use of Student Data.** Students have a right to review and correct Student Data, to delete it, or to tell Adobe to stop using it. To exercise these rights, contact us at [privacy@adobe.com](mailto:privacy@adobe.com). Upon receiving a request, Adobe will work with Schools, as needed, to process the request and to authenticate the requestor.

Should a third party, including law enforcement and government entities through use of legal process, contact Adobe with a request for Student Data, Adobe will redirect the third party to request the Student Data directly from the School, unless and to the extent that Adobe reasonably and in good faith believes that granting such access is necessary to comply with a legal obligation or legal process, or to protect the rights, property, or personal safety of Students or Adobe's users, employees, or others.

### **Adobe Contact Information**

Questions, comments and requests regarding this notice should be addressed to:

- Email Address: [privacy@adobe.com](mailto:privacy@adobe.com)
- Telephone: 1 (800) 833-6687
- Mailing Address: Adobe Inc., Attn: COPPA Notice Inquiry, 345 Park Avenue, San Jose, CA 95110