



## ADOBE WHISTLEBLOWING PRIVACY NOTICE

Last updated: November 25, 2021

### 1. Overview and scope

This notice describes how Adobe group companies ("Adobe", "we", "us" or "our") processes your personal information in the context of whistle blowing. More information about how Adobe processes your data including your rights, and how to exercise them, is set out in our [Employee Privacy Policy](#) for Adobe Workers, or the Adobe [Privacy Policy](#) for anyone else.

This notice applies to anyone who makes a report through channels provided by Adobe to report misconduct in the workplace (the "**whistle blowing channels**") and to anyone about whom a report is made through the whistle blowing channels. The data processing described in this notice may be limited as required by applicable law.

### 2. Collection of report data

We may collect the following information about you when a report is made:

- information to identify you – such as your name, job title and contact details including address and email address;
- information about where you work including the location of your office (or the location of the incident about which a report is being made if that is different);
- information necessary to establish and access your report(s) such a report password;
- information about your behaviour such as your general conduct at work or specific incidents that may have triggered a report to be made;
- information about how you are connected to the incident/behaviour (i.e. whether you reported the incident/behaviour, witnessed the incident/behaviour or allegedly took part in the incident); and
- the content of any subsequent communications relating to the report.

### 3. Lawful basis

We are under a legal obligation to provide whistle blowing channels to certain groups of individuals for certain types of breaches. Where the report falls under this legal obligation, that will be our basis for processing this data. For any other reports, we rely on our legitimate interests to ensure that the conduct of our workers is in-keeping with what is required by law, by industry standards and by Adobe's internal policies and standards.

#### **4. Sharing of report data**

We are partnered with a third-party provider – ComplianceLine – who operates the telephone and webportal Compliance hotline for Adobe. They collect data relating to reports on our behalf and then pass the reports on to us.

#### **5. Retention of report data.**

We will retain data in reports for as long as is necessary and proportionate to comply with the requirements of applicable law. For more information, please see the retention section in the applicable Adobe Privacy Policy.

#### **6. Updates to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.