



TRUSTe LLC Independent GDPR Privacy Practices Validation Findings Letter

Expiration date: March 26, 2021

To the Management of Adobe Inc.,

Scope

TRUSTe LLC ("TRUSTe"), an independent subsidiary of TrustArc Inc ("TrustArc") has reviewed the Marketing Cloud, Advertising Cloud, and Data and Analytics Cloud products of Adobe Inc. and its affiliate Adobe Systems Software Ireland Limited ("Organization") as of March 26, 2020 against the 44 GDPR Privacy Practices Compliance Validation Requirements (the "Validation Requirements") comprising the TrustArc GDPR Privacy Practices Compliance Validation. These Validation Requirements focus on practices-level measures for demonstrating that the processing of personal information conducted by Adobe Inc. is performed in compliance with the EU General Data Protection Regulation (GDPR). The Validation Requirements cover the following 9 areas aligned with the **IMPLEMENT** and **DEMONSTRATE** Standards set forth in the TrustArc Privacy & Data Governance ("P&DG") Framework, for establishing, maintaining, and continually improving a GDPR-compliant privacy practices aligned with the ISO 27001 International Standard for Information Security Management Systems:

1. **Data Necessity**, including data minimization, data protection by design and data protection by default
2. **Use, Retention and Disposal**, including purpose limitation, data retention, lawfulness of processing, processing of sensitive personal information, and retention periods
3. **Disclosure to Third Parties and Onward Transfer**, including processors, other controllers, and international data transfers
4. **Choice and Consent**, including consent for personal information and sensitive information processing, parental consent, mechanisms for obtaining consent, evidence of consent, and the right to withdraw consent
5. **Access and Individual Rights**, including access, rectification, erasure, restrictions, objection, automated decision-making, and data portability
6. **Data Integrity and Quality**
7. **Security**, including employee awareness, risk assessments, safeguards, and incident detection
8. **Transparency**, including privacy notices, notification of changes, breach notification, alternative dispute resolution, provision and timing of notices
9. **Monitoring and Assurance**, including privacy reviews and stakeholder and expert input

Organization's Responsibilities

In connection with the Validation, Adobe Inc. was responsible for providing information through a GDPR Validation Assessment regarding its GDPR compliance practices

and demonstrating with supporting evidence how it complies with each of the applicable Validation Requirements.

Responsibilities of TRUSTe

Our responsibility was to determine whether Adobe Inc.'s GDPR Privacy Practices within the scope described above comply with the Validation Requirements based on the information provided by the Organization. A member of the TrustArc Global Privacy Solutions team reviewed the GDPR Validation Assessment submitted by the Organization according to the Validation Requirements and, if any gaps were identified for remediation, informed the Organization of the remediation necessary to be completed prior to the Organization submitting the GDPR Validation Assessment to TRUSTe for evaluation of whether the Validation Requirements have been sufficiently demonstrated by the Organization. After the Organization remediated any identified gaps and submitted the completed GDPR Validation Assessment, TRUSTe reviewed the completed GDPR Validation Assessment in order to validate that the Organization has met the applicable Validation Requirements.

A validation review of the Organization's GDPR Privacy Practices involves a comprehensive evaluation of the practices-level measures in place and evidence of the practices-level measures to ensure that the processing of personal information conducted by them, or by a third party processor on their behalf, is performed in compliance with GDPR and in alignment with ISO 27001 International Standard for Information Security Management Systems.

Inherent Limitations

Because of their nature and inherent limitations, practices-level measures of the Organization may not always operate effectively to meet the applicable Validation Requirements. Furthermore, our findings herein are subject to the risk that the Privacy Practices, or any component of the Organization's practices, may change or that practice-level measures implemented by the Organization may become ineffective or fail.

Findings

In our opinion, in all material respects, based on the descriptions and supporting evidence of practices-level measures identified in Adobe Inc.'s GDPR Validation Assessment:

- The applicable practices-level measures as further described in the accompanying TRUSTe Validation Report have been implemented as of March 26, 2020.
- The measures described in the GDPR Validation Assessment were suitably designed to provide reasonable assurance that the Validation Requirements would be met if the practices-level measures operated effectively as of March 26, 2020.

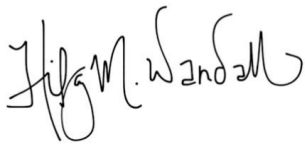
Restricted Use

This Findings Letter and the accompanying report is for the intended use of Adobe Inc. as of March 26, 2020:

- This Findings Letter and the accompanying Compliance Validation Report, and any Summary, provided by TRUSTe may be used by the Organization until the expiration date listed below.

- Only the Findings Letter and accompanying Compliance Validation Report represent the official validation determination of TRUSTe.
- Any modifications or alterations to the Findings Letter, the accompanying Compliance Validation Report, or any Summary, from the versions of those documents issued by TRUSTe shall render those documents invalid.
- Organizations must undergo a new GDPR Compliance Validation in order to make any representations whatsoever as having been determined as GDPR compliant by TRUSTe, TrustArc, or any subsidiary or successor in interest to TRUSTe or TrustArc, after the expiration date.
- This Findings Letter can be shared with the Organization's customers, contractors, and other stakeholders until the expiration date.
- This Findings Letter, the accompanying report, and any Summary provided by TRUSTe may be published on the authorized corporate web site(s) of the Organization, as listed in the Annex to this Findings Letter.
- This Findings Letter expires on March 26, 2021.

This Findings letter and the accompanying report are not intended to be, and should not be used nor relied upon by anyone other than the Organization and, as determined in the sole discretion of the Organization, the Organization's customers, contractors and other permitted stakeholders.



President, TRUSTe LLC
March 26, 2020

ANNEX - Authorized Corporate Websites

<https://www.adobe.com/security/resources.html>