

Privacy notice: Adobe Creative Cloud

This is a privacy notice, which is based on articles 13 and 14 of EU's General Data Protection Regulation.

Controller

Turku University of Applied Sciences Ltd

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kirjaamo@turkuamk.fi

Person in charge and contact persons

Juha-Pekka Saarinen, Head of Digital Services

Contact information of the Data Protection Officer

Please contact in all data protection related matters: tietosuoja@turkuamk.fi

The messages sent to this address are processed by the Data Protection Officer (DPO) and a data protection specialist working with them and as their substitute.

Purpose of processing personal data

Turku University of Applied Sciences has an agreement on using Adobe Creative Cloud products for conducting the work and studies of the staff and students. Adobe requires that all users have an Adobe ID user account.



Legal basis for processing personal data

The legal basis for processing personal data is compliance with a legal obligation. The activities are mainly regulated by the following laws:

- Subsection c of section 1, article 6 of the General Data Protection Regulation (EU 2016/679)
- Act on Universities of Applied Sciences (932/2014)

Processed categories and storage times of personal data

The processed categories of personal data are the identifiers of the staff and students at Turku University of Applied Sciences:

- First name and last name
- User ID
- Email address
- Name of organization
- Language data

When the software is used, Adobe collects statistics which may be individualized.

The personal data is stored until the end of the studies or the employment relationship.

Regular information sources

The user data is automatically updated to Adobe from the user administration system of Turku University of Applied Sciences.



Receivers or receiver groups of personal data

Adobe Inc. and its affiliates. For its part, Adobe also acts as a controller and is responsible for processing personal data. In Europe, the controller is Adobe Systems Software Ireland Limited. The personal data is received and processed also by the contractual reseller Ilona IT Oy.

Essential information regarding transfer of data to third countries (outside the EU or EEA countries)

Turku University of Applied Sciences has an agreement with Adobe's Finnish reseller, Ilona IT Oy, which has its own agreement with Adobe Ireland. Adobe Ireland may transfer personal data to third countries to use distributed services, such as cloud storage, customer support and analytics. Adobe is committed to complying with the GDPR requirements, the Standard Contractual Clauses (SCC) of the EU and the EU-U.S Data Privacy Framework certification.

Principles of data protection

The data is accessed only by people whose tasks require access to the data. Access to the service is limited with user IDs and user rights.

The personal data is stored encrypted until the end of the studies or the employment relationship.

Data subjects' rights

According to the General Data Protection Regulation, the data subject has the right:

- to receive information on the processing of their personal data, unless otherwise regulated by the law



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- to request for access to their personal data and rectification regarding incorrect or insufficient information
 - to erase their data (not applied, if the basis for processing is compliance with a legal obligation or performance of a task carried out in the public interest)
 - to restrict the processing of their data
 - to object to the processing of their data, if the basis for processing is general or legitimate interest
 - to request the transfer of data they have submitted themselves from one controller to another, if the basis for processing is consent or agreement
 - withdraw the consent they have given
 - notification obligation of the controller on the rectification/erasure/restricting of processing of personal data
 - not to be subject to automated decision-making (the data subject may allow automated decision-making by their consent)

Data subjects may exercise their rights by contacting the contact person mentioned in the privacy notice or the Data Protection Officer. More information on data subjects' rights is provided by the contact person and/or Data Protection Officer.

If processing the data does not require identifying the data subject without additional information or the controller cannot recognize the data subject, the right to inspection, rectification, data erasure, restriction of processing, obligation to report and transmittal is not applied.

You have the right to file a complaint with the Data Protection Ombudsman's office, if you consider that valid data protection legislation has been breached in processing your personal data. The contact details of the DPO can be found in the beginning of the privacy notice. All requests are processed on a case-by-case basis.
