



Adobe welcomes the Digital Transformation Agency's Position Paper on Digital Identity Legislation, and we are pleased to share our thoughts in this submission.

Adobe is strong supporter of the Government's Digital Transformation Strategy as a roadmap to achieve the vision of a government which is easy to deal with and fit for the digital age. Digital Identity is a critical part of enabling this strategy, by creating solutions and workflows that ensure inclusion and accessibility for citizens to digital government services.

Our mission at Adobe is to serve the creator and respect the consumer. Adobe's heritage is built on providing trustworthy and innovative solutions to our customers. We take a deliberative and thoughtful approach to establishing infrastructure and principles to help guide our efforts. For example, we have a commitment to privacy-by-design, we have formed a cross-functional global AI Ethics Committee to help navigate complex AI issues and we are an industry leader in accessibility. We support the creation of outstanding web experiences by encouraging developers to produce rich, engaging content that is accessible to all.

As a company, we see digital identity as a way to deliver agility, efficiency, cost savings and great customer and citizen experiences. We believe that our Adobe Sign capabilities represent one of the biggest opportunity areas to accelerate this shift.

While companies around the world have embraced the use of electronic and digital signatures to enable digital identity for internal processes and customer experience, we believe there is a great opportunity for government to take advantage of the same opportunities to enable inclusion and accessibility for citizens to better and more efficiently engage with government.

Adobe has a strong track record working with governments around the world on digital identity initiatives. We are leading members of the [Cloud Signature Consortium](#), working with the EU on new regulations such as eIDAS. Adobe Sign has Aadhaar integration in India and Singpass integration in Singapore. We also support the US Government's single sign-on shared service solution for external users working with the government, [login.gov](#) and we are working with 50 state agencies in the US on similar initiatives.

We are keen to similarly work with the Australian Government and have recently completed IRAP assessment on Adobe Sign, offering assurance that our digital and e-signatures meet the highest levels of information security.

Adobe's business is comprised of three cloud-based solutions – Adobe Creative Cloud, Adobe Experience Cloud, and Adobe Document Cloud – while Adobe Sign sits within the Adobe Document Cloud business, all of our products integrate our Adobe Sign capabilities in order to enable this critical functionality across implementations. We also work closely with partners such as Microsoft, to ensure Adobe Sign is integrated and easily switched on.



As our technology becomes more sophisticated, our products and services have the potential to affect our customers in profound and exciting ways. However, we have a role that goes beyond creating the world's best technology.

We are committed to the conscientious development and use of technological innovations to enable inclusion and accessibility in all our solutions. We appreciate the opportunity to provide comments and look forward to future opportunities to continue the discussion.

A handwritten signature in blue ink that reads 'Jennifer Mulveny'.

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Jennifer Mulveny  
Director, Government Relations Asia-Pacific  
Adobe Inc



## Feedback on the Digital Identity Legislation Paper

Firstly, it is important to note that we are supportive of the overall technical approach to this issue. We have reviewed the DTA's Position Paper and have included some comments and suggestions to specific issues and have outlined the sections of the paper they refer to.

### 1. Consent

The issue of consent is discussed throughout the position paper, but not defined. Adobe is keen to work with the government and the DTA to play a role in this process of defining consent for the purposes of any legislation.

*Relevant sections of the position paper:*

- **Section 3.5 Privacy and consumer safeguards** - requirements for Users' express consent before enabling their authentication to a service.
- **Section 7.4.2 - Safeguards on biometric information** - require identity providers and credential service providers to ask Users for express consent to use their Biometric Information, giving users information about what Biometric Information will be used and the duration of the validity of the consent
- **Section 7.4.6 - Requirement of express consent** - it is proposed the Bill will require a User to expressly consent before an Accredited Participant authenticates and sends attributes to a relying party.

*Our suggestions:*

- In order to properly define consent, we suggest including an agreed definition of "consent" in the Glossary of Terms
- Further, we suggest including guidance on use of electronic or digital signatures based on their legality to provide consent.

### 2. Multiple Digital Identities

*Relevant section of the position paper:*

- **Section 5.2 What we have heard from stakeholders** - Stakeholders held differing opinions about whether people should be allowed to create multiple digital identities.

*Our suggestion:*

- Provide clear examples of acceptable and non-acceptable instances where a person should be allowed to create multiple digital identities in order to clarify the relevant use cases.



### 3. Accreditation process

Relevant section of the position paper:

- **Section 5.4.3 Accreditation Process**

*Our suggestion:*

- Provide clear guidance on the details around the accreditation process

### 4. Accessible and inclusive website design

*Relevant section of the position paper:*

- **Section 7.4.12 - Accessible and inclusive website design**

*Our feedback:*

- We also note that the three requirements listed for accreditation under section 7.4.12 of the Position paper aligns with how our DX capabilities support government. We fully support providing an accessible and inclusive web experience to support citizen and government employees, and our solutions are built from the ground up with this in mind.



## About Adobe and Sign

Since 1982 Adobe has been a business centred on, and dedicated to, creativity. Responding to the changing needs of business and governments we have expanded into the data side of creativity – measuring when and how creativity works. We believe strongly that the emerging digital world is going to be people and creative led, with technology providing the supporting act. In our estimation, the next decade years will see a rise in automation in almost every sphere – but – this automation will be in conjunction with humans. It will assist and augment, suggest and supplement.

One of the critical things we have found in order to best leverage digital capabilities for citizen outcomes is the need for authentication, to enable inclusion and accessibility and to leverage digital identity to enable streamlined approvals and creating a digital solution to ink signatures.

With **eight billion transactions a year**, Adobe is the global leader in secure digital document solutions and standards-based electronic signatures. Adobe Sign allows private and public sector organisations to deliver exceptional, simple signing experiences while ensuring compliance with local and global signature laws. We are trusted and used by more than half of the Fortune 100 companies, government, healthcare, and financial institutions to help automate signing and approvals across a wide range of departments and business processes.

Electronic signatures refer to any electronic process that indicates acceptance of an agreement or a record. Electronic signatures:

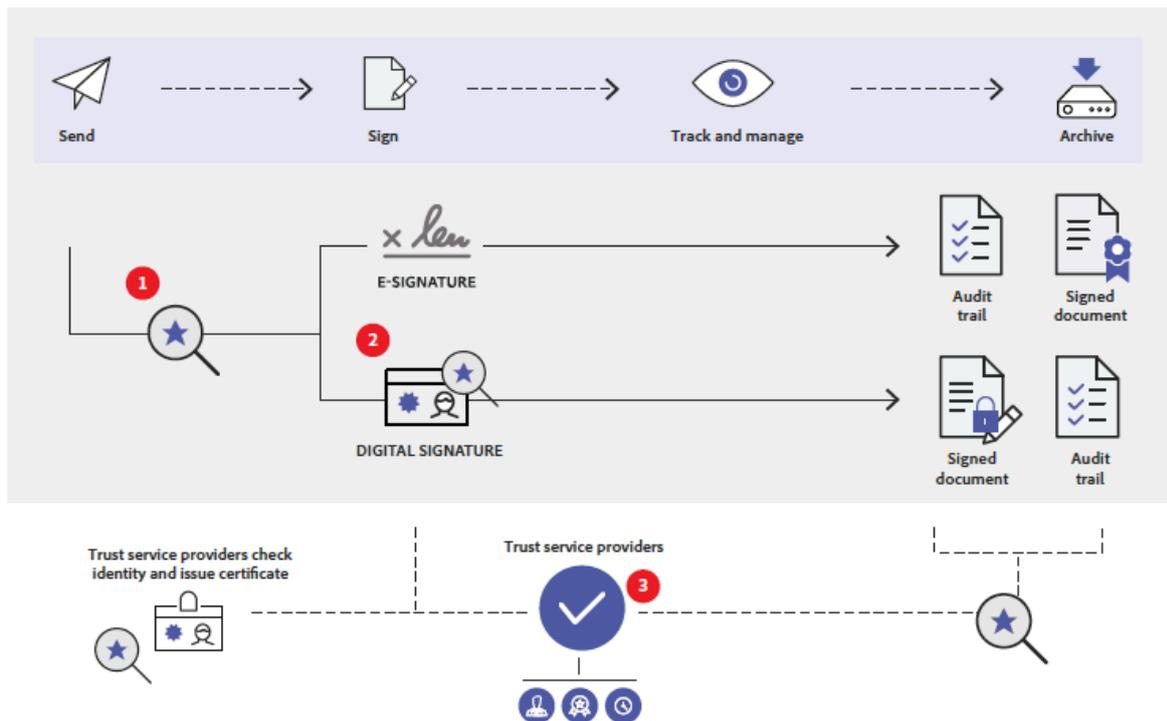
- Use a variety of common electronic authentication methods to verify signer identity, such as email, social IDs, passwords, or a phone PIN.
- Use multifactor authentication to increase security where needed.
- Demonstrate proof of signing using a secure process that often includes an audit trail along with the final document.

Digital signatures on the other hand use a specific method to sign documents electronically. Digital signatures:

- Use a certificate-based digital ID to authenticate signer identity
- Demonstrate proof of signing by binding each signature to the document with encryption – validation is done through trusted Certificate Authorities (CAs) or trust service providers (TSPs).



## E-signatures and digital signatures in Adobe Sign



Adobe Sign is uniquely designed to support the broadest range of electronic and digital signature requirements, so our customers can use them locally or globally – and choose the best approach for each process. With Adobe Sign, users can build end-to-end workflows that include typical e-signatures, digital signatures, or both. We also provide industry-leading support for signer authentication and validation. The process is as follows:

1. Before opening the document, signers authenticate their identity using single factor or multifactor methods.
2. Signers add digital signatures using a password or PIN-protected private key from their certificate to bind their signature to the document.
3. Signer and document authenticity are validated through the trust service providers who issue digital IDs to signers. Adobe Sign works with over 200 TSPs globally, including a growing ecosystem of providers who support cloud-based digital signatures for “anytime and anywhere experiences” on web and mobile devices.

## Summary of the Benefits of Adobe Sign

**Standards-based signing** – Adobe invented the portable document format, known as PDF, and the digital signatures that work in PDF. We then worked with industry-recognised standards organisations such as ISO and ETSI to turn them into open standards. Adobe solutions work with over 200 certificate authorities around the world, and we are the only global vendor to support every EU TSP accredited to issue qualified digital IDs.



Adobe is also advancing global standards again for digital signatures using mobile devices and the web with the [Cloud Signature Consortium](#) (CSC), which is a global group of industry, government, and academic organizations committed to driving standardization of highly secure and compliant digital signatures in the cloud. Inspired by the rigorous requirements of the European Union's Regulation on Identification and Trust Services (eIDAS), our common technical specification helps ease solution interoperability, streamlines compliance with e-signature regulations, and opens the market for uniform adoption of cloud-based digital signatures around the world. The CSC is expanding beyond the EU and is fast becoming the global standard with new TSPs outside of the EU beginning to join, for example VIDA in Indonesia and the Beijing Certifying Authority in China.

We also strongly support local digital identity platforms in various jurisdictions, for example we have enabled integrations for Adobe Sign with Aadhaar in India and Singpass in Singapore. We also support the US Government's single sign-on shared service solution for external users working with the government, [login.gov](#) and we are working with 50 state agencies in the US on similar initiatives. Our real-world cloud signature solutions let users work with high-assurance digital IDs from industry leaders that are easy to use, easy to deploy, and comply with regulatory requirements.

**World-class capabilities** – Adobe Sign makes it easy to manage end-to-end business processes. Users can quickly send documents for signature and expedite projects and processes. Documents are stored in a business system, a chosen repository or Adobe Document Cloud – and support with strict security, so employees can store, access, track and manage documents from anywhere in real time.

**Maximum flexibility** – Adobe Sign is one single, scalable solution to create end-to-end signing processes that include digital signatures, e-signatures, or a combination. Adobe Sign allows the flexibility to build workflows in accordance with specific compliance, industry and risk profile. A user can build digital signature processes within an organisation or in the cloud plus the CA or TSP of choice with support for the full range of signature creation devices including smart cards, USB tokens, and cloud based HSMs.

**Comprehensive security controls** – Adobe takes the security of digital experiences very seriously. Adobe Sign meets rigorous security standards – including ISO 27001, SOC 2 Type 2, and HIPAA, as well as PCI DSS used in the Payment Card Industry. We also employ Adobe Secure Product Lifecycle (SPLC) practices, a demanding set of several hundred specific security activities – spanning software development practices, processes and tools – integrated into multiple stages of the product lifecycle. We have recently completed IRAP assessment in Australia, offering assurance that our digital and e-signatures meet the highest levels of information security.

**An enterprise-grade solution** – Powerful administration tools in Adobe Sign help manage user and group preferences, restrictions and languages quickly and easily. Ultra-high availability data centres in Australia keep business running smoothly.



**Superior prebuilt integrations** – Easily add electronic signatures that work natively in a user’s systems of record with richly featured, preintegrated solutions. Adobe Sign integrations and robust APIs allow users to embed signature processes within the organisation’s enterprise systems and applications. Integrations include Salesforce, Workday, Microsoft Dynamics CRM, Ariba, SAP, Apptus and more. Adobe is the preferred e-Signature solution for Microsoft and we have full integration across their products.

**Exceptional customer experience** – Users of Adobe sign in both the public and private sectors can delight customers with fast response times and efficient contract signing processes. Customers can sign without printing documents, installing software, creating new logins, or scanning. The entire process can take just minutes from start to finish, so everyone can finish quickly and get on with their day.

## Conclusion

Adobe welcomes the Digital Transformation Agency’s Position Paper on Digital Identity Legislation and as strong supporters of the Government’s Digital Transformation Strategy as a roadmap to achieve the vision of a government which is easy to deal with and fit for the digital age, it is a critical part of enabling this strategy.

We are happy to partner and collaborate with the DTA and the Government to coordinate and drive common platforms, technologies and services that enhance user experiences by making government simple, clear and fast. Enabling the use of digital identity and digital signatures to create solutions and workflows can ensure inclusion and accessibility for citizens to digital government services.