

Book Creator

Part 1	
Resource Type (Digital or Application)	Application
Application/Software Title (with links)	Book Creator
	https://bookcreator.com/
Developer/Vendor	Tools for Schools Ltd.
Privacy Policy, Terms of Use (Links)	Legal Center - Book Creator app
(2000)	App Privacy Policy - Book Creator app
	Terms of service - Book Creator app
Description of Application and its Educational	Book Creator is a digital tool that allows users to
Value (Refer to "About Us" page, if	create and publish their own eBooks and digital
applicable) What is the initiative? Describe your	content, making it accessible and engaging for
initiative in enough detail that a reader who knows	
nothing about your work will understand the	various educational and creative purposes.
purpose of your initiative and who your partners	
and other stakeholders are. Describe what you're	
doing, how it works, who is involved and when or	
how long your initiative runs.	
Part 2	
Is this initiative a data-linking program under	No
FOIPPA?	110
If yes, this PPIA must be submitted to the Office of	
the Information and Privacy Commissioner (OIPC).	
A <u>data linking program</u> is when multiple distinct	
data sets are used in conjunction with each other.	
(E.g. MyED information used in School Messenger)	
Is this initiative a common or integrated	No
program or activity (CIPA)?	NO
If yes, this PPIA must be submitted to the Office of	
the Information and Privacy Commissioner (OIPC).	
A CIPA is a program or activity that provides one or	
more services through a public body either working	
collaboratively or on behalf of other public bodies	
or agencies.	
What <u>Personal Information</u> (PI) is involved?	Account data
List all the PI elements that will be collected, used,	o Full name
and/or stored through the use of this app by (but	
not limited to): students, staff, parents, and	
vendors, even unintentionally. If the answer is	o Login credentials (username/password)
'none', then skip to PART 5 and submit this PPIA to	 School or district affiliation
the Privacy Officer for completion.	 Uploaded and created contents (text, images, audio, and video files)
	Devices info (IP address, device type, OS and
	browser info)
	Geolocation data
Use	Book Creator collects personal information (PI)
	,
What is the PI used for (purpose)?	primarily to create user accounts, facilitate content



Will the PI be used to make decisions that directly affect individuals? Does the vendor/provider use collected PI for other purposes, e.g., to advertise its services to students, teachers or parents?	creation, and improve the app through analytics and support. While the PI is not used for automated decisions affecting individuals, the vendor may use it for marketing and communication purposes, provided users opt-in, and shares data with third-party vendors for service improvement, but not for direct advertising.
Disclosure Who will/might access the PI? How might the vendor/provider share the collected PI? What disclosure to 3rd parties might occur (which 3rd parties) and the type of PI being disclosed/shared. How might disclosed PI be used (see above)?	Book Creator staff, teachers, and authorized school administrators may access personal information (PI) to manage accounts, support users, and ensure platform functionality. PI may be shared with third-party service providers such as Google Cloud (for data storage) and Intercom (for support), but only under strict contractual terms for purposes like hosting, analytics, and troubleshooting—not for advertising or resale.
Security Describe the measures put in place, including those implemented internally and by the provider, to secure the PI and to prevent unauthorized access to the PI. Describe the technical and physical measures in place to protect the PI.	Book Creator protects personal information (PI) uses encryption for data both in transit and at rest, stores all data securely in Google Cloud infrastructure (AWS, Google Cloud), and strict access controls. The app also uses cookies for functionality, offers user control over data collection, and signed EU model contract clauses with Google.
Part 3	
Will any PI be stored outside Canada?	Yes
Yes or No. If No, skip to PART 4	Voc
Is any of the PI 'sensitive'? Click on link above to determine if PI is considered sensitive	Yes
Where is the PI being stored?	Personal information is stored in a Google Cloud
Where, what regions are the PI being stored in,	datacentre in Council Bluffs, Iowa, United States.
including backups. What hosting providers are	Back up data is stored in various Google Cloud
being used?	datacentre locations in the U.S.
Part 4	
Ownership and Retention of PI Who owns the PI, according to applicable contracts/agreements. Describe the provisions, controls and guarantees in place on the retention of PI: storage before expiry, backups, destruction/deletion of PI	Retention: PI is retained as long as the user account is active or as needed to fulfill the app's purposes (e.g., content creation, user support). Backups: Data is stored securely by Amazon Web Services (AWS) and Google Cloud, with standard cloud backup protocols in place. Destruction/Deletion: Users can request deletion of their accounts and data. Upon receiving a deletion request, Book Creator will act on the request within five business days (normally within one business day) which will remove the content from all live systems. Content will remain in backups for the next 30 days after which it will be permanently deleted.



Accuracy of PI Describe the provisions that allow individuals to request corrections to their PI held within the application/service	Students and parents/guardians may correct their own personal profile information when logged in to Book Creator under "Settings". Users can manage or delete their books and account data through the app interface or by submitting a request at support@bookcreator.com .	
Part 5		
Recommendation	Conditionally Approved.	
Recommendation for Approval, Abeyance/Suspension (pending further review) or Rejection, based on a review and assessment of Privacy Risk. For an approval, provide any applicable conditions of use and/or other risk mitigation measures advised to achieve an acceptable level of privacy risk	 Conditions of Use: Use anonymized or pseudonymous accounts where possible. Avoid media uploads. Disable non-essential cookies and tracking features. 	
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