Gale in Context: Canada

Part 1	
Resource Type (Digital or Application)	Digital
Application/Software Title (with links)	Gale in Context: Canada Basic Search - Gale In Context: Canada
Developer/Vendor	Gale/Cengage Group
Privacy Policy, Terms of Use (Links)	https://www.cengagegroup.com/privacy/ https://www.cengagegroup.com/legal/terms-gale/
Description of Application and its Educational Value (Refer to "About Us" page, if applicable) *What is the initiative? Describe your initiative in enough detail that a reader who knows nothing about your work will understand the 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.*	**Gale in Context: Canada** a division of **Cengage Learning**, is a curriculum-aligned digital database focused on Canadian topics, people, and history. It includes full-text articles, primary sources, news, videos, images, audio, and vetted websites—all structured to support Canadian learning objectives.
Part 2	
Is this initiative a data-linking program under FOIPPA? *If yes, this PPIA must be submitted to the Office of the Information and Privacy Commissioner (OIPC). A data linking program is when multiple distinct data sets are used in conjunction with each other. (E.g. MyED information used in School Messenger)*	No
Is this initiative a common or integrated program or activity (CIPA)? *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.*	No
What Personal Information (PI) is involved? *List all the PI elements that will be collected, used, 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 'none', then skip to PART 5 and submit this PPIA to the Privacy Officer for completion.*	• Identifying information (Name, email address, mailing address, telephone number, login credentials, school affiliation, roles) • Device information (IP address, device/browser type, geolocation, cookies, search history, usage activity)
Use *What is the PI used for (purpose)? 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?*	• PI collected will be used to authenticate users, deliver personalized content, and enhance platform performance. • PI may be used to advertise Gale or Cengage services, but only with user consent • Users can opt out of marketing communications via account settings or privacy request channels

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)?*	Personal Information (PI) may be accessed by the following: • By schools/libraries to access usage data from student accounts, course activity, grades, etc. • By Cengage staff for account management, support, and service delivery. • By authorized third-party service providers (e.g., hosting, analytics, integration platforms) for usage patterns analyses and performance improvements. To support integrations and user workflows and to send optional marketing communications (only with user consent).
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.*	Cengage protects personal information (PI) using encryption (in transit and at rest), strict access controls, secure authentication, and continuous system monitoring.
Part 3	
Will any PI be stored outside Canada? *Yes or No. If No, skip to PART 4*	Yes
Is any of the PI 'sensitive'? *Click on link above to determine if PI is considered sensitive*	Yes
Where is the PI being stored? *Where, what regions are the PI being stored in, including backups. What hosting providers are being used?*	• PI for **Gale in Context: Canada** is stored and backed up in the United States (and potentially other countries). • Cengage uses authorized third-party cloud hosting providers to store and manage PI securely. • Tools such as ServiceNow, Google Analytics, Dynatrace, Splunk are used for support, analytics, and monitoring, which may also involve data residing 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*	• **General retention**: PI is kept only as long as necessary—for business, legal, accounting, reporting, or educational purposes—then securely deleted or anonymized. • **K-12 student data**: Held only as long as needed for educational objectives, deleted upon client (school) or parent/student request • **MindTap content**: Instructors can retrieve data up to one-year post-termination; after, Cengage may permanently delete all user data.
Accuracy of PI	Users in Canada can opt-out and request corrections or deletion of their data through Cengage's privacy

Describe the provisions that allow individuals to request corrections to their PI held within the application/service	request process. If you would like to request a correction or deletion of your personal information, please fill out the privacy form or call 1-855-477-9840. For inquiries, send an email to privacy@cengage.com.
Part 5	
Recommendation *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*	Approved.
PIA Version	1.0
Date Created	14 July 2025
References	https://cengage.my.site.com/s/rtbf https://www.cengage.ca/privacy/k12-notice https://www.cengage.ca/lms-admin/mindtap-service-agreement