

# Sora

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| <b>Part 1</b>  |  |
| <b>Resource Type (Digital or Application)</b>  | Digital  |
| <b>Application/Software Title (with links)</b>   | <b>Sora</b><br><a href="https://soraapp.com/">https://soraapp.com/</a>   |
| <b>Developer/Vendor</b>  | OverDrive, Inc.  |
| <b>Privacy Policy, Terms of Use (Links)</b>  | <a href="#">Privacy at OverDrive</a><br><a href="#">Terms &amp; Conditions   Privacy at OverDrive</a>  |
| <b>Description of Application and its Educational Value (Refer to "About Us" page, if applicable)</b> <i>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.</i> | <b>Sora</b> is a classroom-ready school reading platform that helps students build confidence, improve literacy skills, and develop a lifelong love of reading. It is a digital reading app that helps students from K-12 find eBooks, audiobooks, and more from their school library.   |
| <b>Part 2</b>  |  |
| <b>Is this initiative a data-linking program under FOIPPA?</b><br><i>If yes, this PPIA must be submitted to the Office of the Information and Privacy Commissioner (OIPC). A <a href="#">data linking program</a> is when multiple distinct data sets are used in conjunction with each other. (E.g. MyED information used in School Messenger)</i>  | No   |
| <b>Is this initiative a common or integrated program or activity (CIPA)?</b><br><i>If yes, this PPIA must be submitted to the Office of the Information and Privacy Commissioner (OIPC). A <a href="#">CIPA</a> 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.</i>  | No   |
| <b>What <a href="#">Personal Information (PI)</a> is involved?</b><br><i>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.</i>   | <ul style="list-style-type: none"> <li>Identifying information (Name, email address, School or Library Information, login credentials)</li> <li>Device information (IP address, device type, browser information, location, app usage logs)</li> <li>Usage &amp; activity data (Search queries, borrowing history, reading progress, bookmarks, highlights, notes, and online activity)</li> </ul> |
| <b>Use</b><br><i>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?</i>  | <ul style="list-style-type: none"> <li>PI is used for account management, personalizing reading experiences, and improving app performance through analytics.</li> <li>PI is used only to operate, secure, and improve Sora, including authentication, borrowing, reading progress, and support.</li> </ul>  |

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|  | <ul style="list-style-type: none"> <li>OverDrive does not use PI for targeted advertising and does not sell PI; children's PI is strictly protected.</li> </ul>  |
| <b>Disclosure</b><br><i>Who will/might access the PI?<br/> 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)?</i> | <ul style="list-style-type: none"> <li>PI may be accessed by OverDrive staff, authorized service providers, and school/library administrators for the purposes of operating the service, managing accounts, providing support, and ensuring security.</li> <li>PI may be shared only with service providers, schools/libraries, legal authorities, and publishers (aggregated, non-identifiable data only); OverDrive states it does not sell PI and does not share PI for targeted advertising.</li> <li>Disclosed PI is used strictly for service optimization, personalized experiences, and ensuring proper educational content access.</li> </ul> |
| <b>Security</b><br><i>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.</i>          | <ul style="list-style-type: none"> <li>Data is encrypted with SSL/TLS, and secure login processes prevent unauthorized access.</li> <li>PI is stored in secure data centers with 24/7 surveillance and restricted access controls.</li> <li>Only authorized personnel can access PI, with activity logged and regular security audits conducted.</li> </ul>  |
| <b>Part 3</b>  |  |
| <b>Will any PI be stored outside Canada?</b><br><i>Yes or No. If No, skip to PART 4</i>  | Yes  |
| <b>Is any of the PI 'sensitive'?</b><br><i>Click on link above to determine if PI is considered sensitive</i>  | No   |
| <b>Where is the PI being stored?</b><br><i>Where, what regions are the PI being stored in, including backups. What hosting providers are being used?</i>   | OverDrive stores and processes personal information on servers located in the United States and other countries, not exclusively in Canada. PI in Sora is stored in secure data centers, including locations in the United States. OverDrive uses hosting providers to store and back up data, although did not specify the name of the hosting providers.   |
| <b>Part 4</b>  |  |
| <b>Ownership and Retention of PI</b><br><i>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</i>                 | <ul style="list-style-type: none"> <li>Users and schools/libraries retain ownership of PI, while OverDrive acts as the service provider that processes PI only to operate Sora; all Sora data-access and deletion requests for students must go through the school, confirming institutional control.</li> <li>PI is retained as long as necessary to provide services and comply with legal requirements, with secure backups.</li> </ul>   |

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|   | <ul style="list-style-type: none"> <li>PI is deleted or anonymized when no longer needed, and users can request account deletion.</li> </ul>   |
| <b>Accuracy of PI</b><br><i>Describe the provisions that allow individuals to request corrections to their PI held within the application/service</i>   | <p>Any questions about the Sora privacy policy, contact OverDrive at <a href="mailto:privacy@overdrive.com">privacy@overdrive.com</a>. Alternatively, you may visit the <a href="#">Data Request</a> center.</p> <p>You can also contact OverDrive by calling (216) 573-6886 or by mail at One OverDrive Way, Cleveland, Ohio 44125 USA, Attention: General Counsel.</p> |
| <b>Part 5</b>   |  |
| <b>Recommendation</b><br><i>Recommendation for <b>Approval</b>, <b>Abeyance/Suspension</b> (pending further review) or <b>Rejection</b>, 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</i> | Approved.  |
| <b>PIA Version</b>  | 1.0  |
| <b>Date Created</b>   | 23 December 2025   |