

# Twig Science

<b>Part 1</b>	
<b>Resource Type (Digital or Application)</b>	Digital
<b>Application/Software Title (with links)</b>	<b>Twig Science</b> <a href="#">Twig Secondary - Science resources for middle school</a>
<b>Developer/Vendor</b>	Imagine Learning LLC.
<b>Privacy Policy, Terms of Use (Links)</b>	<a href="#">Privacy Policy</a> <a href="#">End User TOS 2022 IL LLC.pdf</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>Twig Secondary</b> is a collection of real-world video content, focusing on science, engineering, and mathematics. The three-minute videos are accompanied by materials developed for students and educators.
<b>Part 2</b>	
<b>Is this initiative a data-linking program under FOIPPA?</b> <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> <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> <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>	<p><b>*** No personal information is collected, used, and/or stored if the login credentials provided by your school district are used. ***</b></p> <p>The personal information (PI) listed below will be collected, used, and/or stored if users (students, school staff, parents, etc.) create an account directly to the <a href="#">Twig Science or Imagine Learning website</a>.</p> <ul style="list-style-type: none"> <li>Identifying information (Name, login credentials, language, student number, grade level)</li> <li>Device information (IP address, device/browser type, cookies, interaction logs)</li> </ul>

	<ul style="list-style-type: none"> <li>• User-generated feedback and metadata.</li> <li>• Student-generated content (Responses to writing prompts and math journals)</li> </ul>
<b>Use</b> <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>• Personal information is used solely to provide, secure, and support Twig Science services, track student progress, and improve the educational platform.</li> <li>• PI is not used for automated decisions affecting individuals, nor for advertising, marketing, or targeted profiling to students, parents, or teachers.</li> </ul>
<b>Disclosure</b> <i>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)?</i>	<ul style="list-style-type: none"> <li>• LEA administrators, teachers for their students, parents (if linked), authorized Imagine Learning staff, and contracted service providers may access personal information.</li> <li>• PI is shared only with authorized service providers, LEA-directed integrations, legal authorities, and corporate affiliates/successor entities, strictly for operational, educational, or legal purposes.</li> <li>• Shared PI is not used for advertising or marketing; third parties are contractually restricted to use PI solely to provide or support the service.</li> </ul>
<b>Security</b> <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>• PI is protected using encryption (in transit and at rest), secure authentication, firewalls, system monitoring, audits, limited employee access, vendor security requirements.</li> <li>• Facilities and servers are secured with controlled access and alarms, and breach/incident response procedures are in place to detect, mitigate, and notify stakeholders of unauthorized access.</li> </ul>
<b>Part 3</b>	
<b>Will any PI be stored outside Canada?</b> <i>Yes or No. If No, skip to PART 4</i>	Yes
<b>Is any of the PI <u>'sensitive'</u>?</b> <i>Click on link above to determine if PI is considered sensitive</i>	Yes
<b>Where is the PI being stored?</b> <i>Where, what regions are the PI being stored in, including backups. What hosting providers are being used?</i>	<ul style="list-style-type: none"> <li>• All personal information is stored and processed in the United States. Data is retained in secure backups and archives within U.S. infrastructure, even after account deletion, for continuity and legal compliance.</li> <li>• Hosting and processing use authorized third-party providers under contractual privacy</li> </ul>

	and security obligations; users outside the U.S. consent to cross-border data transfer.
<b>Part 4</b>	
<b>Ownership and Retention of PI</b> <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>• The Local Educational Agency (LEA) retains full ownership of all personal information; Imagine Learning acts only as a service provider/processor.</li> <li>• PI is stored encrypted in the U.S., retained only as needed for service, legal, or business purposes, with backups maintained securely even after account deletion.</li> <li>• PI is deleted from live systems upon LEA instruction or account termination, while backups may persist temporarily; de-identified data may be retained indefinitely for analytics.</li> </ul>
<b>Accuracy of PI</b> <i>Describe the provisions that allow individuals to request corrections to their PI held within the application/service</i>	Users may send their requests to update or correct inaccuracies or delete your personal information (PI) by contacting <a href="mailto:privacy@imaginelearning.com">privacy@imaginelearning.com</a> .
<b>Part 5</b>	
<b>Recommendation</b> <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>	29 December 2025
<b>Other References</b>	<a href="#">Twig Science</a> <a href="#">Privacy Policy - International Imagine Learning</a>