

# XTool Creative Space

<b>Part 1</b>	
<b>Resource Type (Digital or Application)</b>	Application
<b>Application/Software Title (with links)</b>	<b>XTool Creative Space</b> <a href="#">xTool Studio</a>
<b>Developer/Vendor</b>	XTL US INC.
<b>Privacy Policy, Terms of Use (Links)</b>	<a href="#">Terms of service</a> <a href="#">Privacy policy</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>xTool Creative Space (XCS)</b> is a free, intuitive design and control software developed to be used with xTool laser cutters and engravers. It allows users to design, edit, and send projects directly to their xTool device for engraving, cutting, or scoring on materials like wood, acrylic, leather, and metal. Ideal for Grades 6–12 and post-secondary, <b>xTool Creative Space</b> helps students explore digital fabrication, design thinking, and entrepreneurship by connecting creative design with hands-on making—transforming digital ideas into real-world objects.
<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 <u>Personal Information</u> (PI) 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>xTool Creative Space (XCS)</b> is a locally installed application used by ADST students. Personal information (PI) may be collected, used, and/or stored when users (students, school staff, or parents) register and create an account on the website.</p> <ul style="list-style-type: none"> <li>• Identifying information (Name, email address, phone number, postal address, login credentials)</li> <li>• Device information (IP address, device info, browser type, cookies)</li> </ul>

	<ul style="list-style-type: none"> <li>• Financial Data (Payment and billing information)</li> <li>• Interaction &amp; Communications Data (Support messages, forms, and interactions)</li> </ul>
<b>Use</b> <i>What is the PI used for (purpose)?</i> <i>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>• xTool Studio uses personal information to provide, maintain, improve services, and communicate with users about their accounts and support inquiries.</li> <li>• PI may be used to send users promotional messages about xTool products and services, but it is not used for automated decisions that directly affect individuals' rights or status.</li> </ul>
<b>Disclosure</b> <i>Who will/might access the PI?</i> <i>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>• xTool (XTL US INC. and its affiliates/subsidiaries) may access PI, along with internal teams that operate xTool Studio, accounts, devices, and customer-support systems.</li> <li>• PI may be shared with contracted service providers, affiliated companies, marketing partners (only with user consent).</li> <li>• Disclosed PI is used to deliver and maintain services, provide support, perform analytics and service improvements, send opted-in marketing communications.</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>• xTool does not disclose any technical, physical, or administrative security measures for protecting PI in xTool Studio.</li> <li>• xTool states it uses commercially acceptable security measures to protect personal information from unauthorized access, alteration, disclosure, or destruction, while acknowledging that no online system is completely secure.</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 'sensitive'?</b> <i>Click on link above to determine if PI is considered sensitive</i>	No
<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>	It does not state where personal information is physically stored, what country or region it is kept in, or where backups are maintained.
<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>• No retention provisions are disclosed, and no deletion or destruction guarantees are provided.</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>	For any privacy-related inquiries or to request updates or deletion of personal information, please email <a href="mailto:vicky@info.xtool.com">vicky@info.xtool.com</a> or contact: <b>xTool Studio</b> 16035 Arrow Hwy. Irwindale, CA 91706 +1 (970) 638-7030
<b>Part 5</b>	
<b>Recommendation</b> <i>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</i>	<b>Approved.</b> We recommend using the xTool Studio application installed on district ADST devices.
<b>PIA Version</b>	1.0
<b>Date Created</b>	31 December 2025