

# Introduction

This privacy policy explains how Book Oven Inc. (hereafter “Book Oven” or “we”) and the hosted Pressbooks software collect and process personal information. This privacy policy is part of the service agreement between Book Oven and its client institutions.

This policy may be updated from time to time. You should check this page regularly to ensure that you are happy with any changes. This policy is effective from May 1, 2019.

Please note that the present Privacy Policy does not cover the content and metadata in books created on the hosted Pressbooks network, nor the content in comments users leave on a Pressbooks book. For policies related to book or comment content, please consult our Terms of Service.

To contact us, email [support@pressbooks.com](mailto:support@pressbooks.com).

## Definitions:

In this document:

- “Client institution” or “you” refers to the institution with which Book Oven has a service contract for a hosted Pressbooks network, or the employees acting on its behalf.
- “Pressbooks” or “Pressbooks network” is open source software for online book creation developed and maintained by Book Oven.
- “Hosted Pressbooks network” refers to the instance(s) of the Pressbooks software that is hosted by Book Oven as part of your SaaS service contract.
- “Users” refers to any person accessing your hosted Pressbooks network in any capacity, such as network managers, book administrators, authors, or readers. Please keep in mind that users may be individuals outside of your institution visiting the public pages of your hosted Pressbooks network.

## General principles

Book Oven is committed to ensuring that the privacy of your users is protected. Should we or the hosted Pressbooks software require you or your users to provide certain information by which you can be identified, you can be assured that it will only be used in accordance with this privacy statement.

The present document outlines the policy between Book Oven and its client institution. The client institution should have a separate public privacy policy that outlines the policy applicable to the users of the hosted Pressbooks network.

Unless otherwise stated, the personal data listed in this privacy policy is owned by Book Oven.

## 2. Personal data collected by Pressbooks/Book Oven

### Personal data collected by the Pressbooks network

The Pressbooks software requires some personal information in order to create user accounts. This information is stored within the hosted Pressbooks network and **is owned by the client institution**:

- **Registration information:** In order to register an account on the hosted Pressbooks network, users will need to provide a **username, password, and email address**. If your network has LTI or SSO enabled, please see the “LTI plugin” and “SSO plugin” sections below.

If comments are enabled, unregistered commenters must provide a **name, email address** and, optionally, a **website**.

The collection of this data is necessary in order to access the Pressbook service as a registered user or commenter.

This data may be displayed publicly if the user publishes book or comment content. This data (except for the password) is also accessible on a network level by network managers and superadmins, and on a book level by book administrators.

- **Profile information:** Users may choose to complete the user profile associated with their user account on the hosted Pressbooks network. The user profile includes information such as **first and last names, profile picture or other biographical information**.

This information is provided on a voluntary basis and may be displayed publicly. By providing this information in the user profile, users consent to the collection and processing of the data.

Pressbooks uses Gravatar to generate profile pictures for commenters and, optionally, for registered users. Please see the section on Gravatar under “Third-party plugins and integrations”.

Moreover, the following data is collected by the servers hosting the Pressbooks network and is stored on our servers:

- **Log data:** Our server logs automatically collect the **IP addresses** of any user accessing the hosted Pressbooks network.

This data is only accessed in cases where it is necessary to ensure server security or to resolve technical issues. The collection of this data is necessary in order to fulfill our service contract, to ensure the proper functioning and security of the hosted Pressbooks network.

## Personal data collected by our Customer Support platform

Customer support requests sent to one of our support email addresses are handled through Groove, a platform that automatically collects the following information:

- If the request is made by email: the **email address**, as well as the **public profile information** associated with the email address, such as **first and last names, profile picture**, when this information is available.
- If the request is made through the contact form on the Pressbooks.com website: **name** and **email address** as entered in the form fields.

The collection of email addresses is necessary in order for us to fulfill our contractual support obligations.

By contacting us, users consent to the collection and use of their email address as well as associated public profile information. This information is used inside Groove to better respond to user support requests. You are also advised to consult [Groove's privacy policy](#).

## Personal data collected by our mass mailing platform

Occasional email newsletters, announcements, or other communications with useful information may be sent using Mailchimp to network managers or other people involved in the administration of the hosted Pressbooks network. The following information is thus stored in Mailchimp:

- **Name** and **email address** of the email recipient.
- **Analytics data** on the recipient's interaction with the email content (deliverability, opens, clicks, forwards, unsubscribes, spam reports).

The collection of the name and email address of the main contact person for the hosted Pressbooks network is necessary in order to fulfill our contractual obligations. The collection of analytics data helps us improve the quality of our communications. By being the main contact person and accepting communications related to the hosted Pressbooks network, network managers consent to the collection of analytics data.

Other users involved in the administration of the hosted Pressbooks network may request to receive the communications and, in so doing, consent to the collection of the above data.

Users can unsubscribe from these mailing lists at any time via the “Unsubscribe” link at the bottom of the emails or by emailing us at [support@pressbooks.com](mailto:support@pressbooks.com).

You are also advised to consult [Mailchimp's privacy policy](#).

### **Personal data entered into our client management software**

We maintain a database of clients in Airtable, which contains information on key contact people at client institutions: **Name, email address, title, and institution**. The collection of this data is necessary to fulfill our contractual obligations, in order to communicate appropriately with client institutions. You are also advised to consult [Airtable's privacy policy](#).

### **Personal data entered into our billing software**

We may use Freshbooks to invoice the client institution. In this case, the **name and institutional contact information** for the main purchasing contact person may be entered into Freshbooks. If the client institution opts to pay via Freshbooks, **credit card information** may be collected by Freshbooks or our payment processors Stripe or Paypal. The collection of this data is necessary in order to bill the client institution, fulfill our contractual obligations, as well as for legal and accounting purposes.

You are advised to consult [Freshbook's privacy policy](#), [Stripe's privacy policy](#), and [Paypal's privacy policy](#).

## **3. Personal data collected through plugins and optional integrations**

It is possible to install and use optional plugins and integrations on the hosted Pressbooks network. These plugins and integrations may be offered by us or by third parties. It is the client institution's responsibility to inform themselves and their users of any privacy concerns related to the use of these plugins and integrations.

## Plugins and integrations maintained by us

### LTI Provider plugin

The [Pressbooks LTI provider plugin](#) allows you to connect your hosted Pressbooks network with one or more LTI consumers, like an institutional Learning Management System. Once activated, the LTI plugin collects the following information:

- The user's **LTI ID** and **email address**, which are used to create a user account on the hosted Pressbooks network, or log them into an already existing user account.
- The user's **LMS user role**, which is used to assign the proper role to the user on the books being accessed.

Once a user is created, the information is stored in the hosted Pressbooks network and **owned by the client institution**. The collection of this information is necessary in order to ensure the proper functioning of this plugin.

### CAS SSO plugin

The [CAS SSO plugin](#) allows users to create accounts and log into your hosted Pressbooks network with your institution's CAS Single Sign-On service. Once active, the CAS SSO plugin collects the following information:

- The user's **meta key**, **NetID** and **email address**, which are used to create a user account on the hosted Pressbooks network or log them into an already existing user account.

Once a user is created, the information is stored in the hosted Pressbooks network and **owned by the client institution**. The collection of this information is necessary in order to ensure the proper functioning of this plugin.

### SAML2 SSO plugin

The SAML2 SSO plugin allows users to create accounts and log into your hosted Pressbooks network with your institution's SAML2 Single Sign-On service. Once active, the SAML2 SSO plugin collects the following information:

- The user's **UID**, **email address**, and the string stored in **eduPersonPrincipalName** which are used to create a user account on the hosted Pressbooks network, or log them into an already existing user account.

Once a user is created, the information is stored in the hosted Pressbooks network and **owned by the client institution**. The collection of this information is necessary in order to ensure the proper functioning of this plugin.

## Third-party plugins and integrations

Book Oven does not share personal information with these plugins. However, these plugins may collect personal information from your users directly if you use them on your hosted Pressbooks network. Such third-party services include, but are not limited to:

### Gravatar

Registered users may use Gravatar to generate a profile picture. Gravatar is also used to generate an avatar for commenters from a hash created from their email address. Please see the [Gravatar privacy policy](#).

### Google Analytics

It is possible to add Google Analytics tracking to the hosted Pressbooks network. Analytics data collected this way are managed by the client institution in their own Google Analytics account.

### Hypothesis

Hypothesis is a third-party plugin that may be enabled on a book-by-book basis by some users. Please see the [Hypothesis privacy policy](#).

### H5P

H5P is a third-party plugin that may be enabled on a book-by-book basis by some users. Please see [H5P's privacy policy](#).

### TablePress

TablePress is a third-party plugin that may be enabled on a book-by-book basis by some users.

### Akismet

Akismet is a spam filtering tool that may be enabled on the hosted Pressbooks network. Please see [Akismet's privacy policy](#).

### Parsedown Party

[Parsedown Party](#) is a plugin that allows you to use Markdown. It may be enabled on the hosted Pressbooks network.

### Redis Cache

[Redis Cache](#) is a plugin that may be enabled on the hosted Pressbooks network.

## Regenerate Thumbnails

[Regenerate Thumbnails](#) is a plugin that may be enabled on the hosted Pressbooks network. “This plugin does not log nor transmit any user data. In fact it doesn’t even do anything on the user-facing part of your website, only in the admin area.”

## Roots Multisite URL Fixer

[roots/multisite-url-fixer](#) is a plugin that may be enabled on the hosted Pressbooks network.

## roots/wp-password-bcrypt

[roots/wp-password-bcrypt](#) is a plugin that may be enabled on the hosted Pressbooks network.

## User Activation Keys

[User Activation Keys](#) is a plugin that may be enabled on the hosted Pressbooks network.

## WP Fail2Ban Redux

[WP Fail2Ban Redux](#) is a plugin that may be enabled on the hosted Pressbooks network.

## WP QuickLateX

[WP QuickLaTeX](#) is a plugin that may be enabled on the hosted Pressbooks network.

If your hosted Pressbooks network uses other third-party plugins and integrations, it is your responsibility to inform yourself and your users about their privacy implications.

## Disclaimers

### Embedded content and external links

The Pressbooks software allows book creators to embed content from external websites or link to them. Embedded content from other websites often behaves in the same way as if the visitor has visited the other website.

These websites may collect data about your users, use cookies, embed additional third-party tracking, and monitor user interaction with that embedded content.

Although we try to limit the type of embedded content that may pose security risks, we are not responsible for the behaviour of content from third-party websites that your users embed or insert into their books. It is the institution’s responsibility to set and enforce policies regarding the embedding and linking of external content.

## **Use of personal data by the client institution**

Book Oven is not responsible for the use or misuse of personal data stored on your hosted Pressbooks network by your employees or users. It is the responsibility of the client institution to adequately inform their users of the institution's privacy policy regarding their data, as well as monitor the use of the personal information stored on your hosted Pressbooks network.

## **Personal data of minors**

It is the client institution's responsibility to ensure that appropriate measures and policies are in place to deal with personal data of children and minors, when applicable.

## **Cookies**

Cookies are small files stored on users' computers, and contains information identifying their session. Cookies may be set by the Pressbooks network or third-party services used on the network.

Cookies set by the hosted Pressbooks network are used in the following cases:

- If users leave a comment on your site, they may opt-in to saving their name, email address and website in cookies. These cookies will last for one year.
- If users log into their account on the hosted Pressbooks network, a temporary cookie will be set to determine if their browser accepts cookies. This cookie contains no personal data and is discarded when they close their browser.
- When users log in, several cookies are set to save their login information and screen display choices. Login cookies last for two days, and screen options cookies last for a year. If users select "Remember Me", their login will persist for two weeks. If they log out of their account, the login cookies will be removed.
- If users edit or publish an article, an additional cookie will be saved in their browser. This cookie includes no personal data and simply indicates the post ID of the article the user just edited. It expires after 1 day.

If your hosted Pressbooks network uses integrations or plugins that set cookies other than the ones described above, it is your responsibility to inform your users about them.

## **Processing of other data**

In addition to the cases outlined above, we may process personal information where such processing is in our legitimate interests and not overridden by users' data protection interests or fundamental rights and freedoms. Our legitimate interests typically include: improving, maintaining, providing, securing and enhancing our products and services in order to fulfill our contractual obligations.

We are committed to ensuring that your users' information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. All user traffic is sent over HTTPS and we ensure strict security on our servers to prevent unauthorized access.

## **Access of personal data by Book Oven staff**

Book Oven employees may access the hosted Pressbooks network and the personal data hosted thereon for technical support purposes.

## **Location and International transfers of the personal data**

Our servers are located on secure AWS databases in Montreal, Canada. Data transferred to third-party services may be hosted elsewhere. Please check the privacy policies of third party services enabled on your hosted Pressbooks network.

## **Data retention**

Personal data collected by and stored in the hosted Pressbooks network is retained as long as your service agreement is in effect.

Personal data owned by Book Oven may be stored indefinitely.

## **Exercise of user rights**

Personal data stored in the hosted Pressbooks network is owned and managed by the client institution. It is therefore your responsibility to respond to user requests regarding their personal data.

Registered users may access and modify their personal information (except their username) at any time from their user profile page.

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