

Pressbooks EDU Privacy Policy

(Effective March 11, 2021)

Welcome!

Welcome to Pressbooks, and your Pressbooks Educational Network. We hope you will enjoy and appreciate using our “**Services**” provided to you by your “**Educational Institution**”, which allow you to edit and format e-books and other related educational content online along with related functionalities. Book Oven Inc., the company that owns and operates the Services, wants you to know we take your privacy and protection of personal data very seriously. We are providing this Privacy Policy (the “**Policy**”) to tell you about who we are, what personal data we collect from you and about you, and what we do with your personal data, all while you use the Services or otherwise interact with us. The Policy also explains your rights under the law, and how you can contact us and the necessary authorities to enforce those rights. We ask that you please read it carefully.

Please note that if you are using the Pressbooks Services that are available at pressbooks.com, you are covered by [a different Privacy Policy](#) which we invite you to read.

Key Elements of this Policy

Here are the key elements of this Policy so that you can make an informed decision about your consent for our collection, use and disclosure of your personal data. By submitting any personal data to us via any means, you consent to such collection, use and disclosure. You can find the details in the rest of the Policy.

Personal data we collect from you but only with your consent	What we do with it	Third parties we share it with
Contact Information	Communicate with you	Companies that provide our communications services
User Information	Manage your account, and enable logging in to the Services	Companies that provide the infrastructure for the Services, specifically Amazon AWS

Some Terms

Before we get started with the details, here are a few terms we think you should know as you read this Policy.

“Data Protection Laws” refers to the laws that are designed to protect your personal data and privacy in the place where you live. These include: (1) the **“GDPR”**, the European Data Protection Law which stands for “General Data Protection Regulation”, with the official name *Regulation (EU) 2016/679 of the European Parliament and of the Council*; (2) **“PIPEDA”** (*Personal Information Protection and Electronic Documents Act*), which is the Canadian Data Protection Law that applies to our activities in Canada; and (3) the *California Consumer Privacy Act* (**“CCPA”**) which applies to our activities in the United States in certain circumstances. Pressbooks is committed to adhering to all these applicable Data Protection laws.

“Personal data” – this is information we collect from you or about you and which is defined in the GDPR as “any information relating to an identified or identifiable natural person.” It can be as simple as your email, or something more complicated like an online identifier (usually a string of letters and / or numbers) that gets attached to you. Under PIPEDA and the CCPA, the equivalent concept is “personal information”, which is roughly the same. Any mention of “personal data” in this Policy shall also mean personal information.

About Us and Contacting Us

Book Oven Inc. is a duly-incorporated company in the Province of Quebec, Canada that owns and operates the Services under the name **“Pressbooks”**. Where this Policy refers to “Pressbooks”, it may refer to Book Oven Inc. and / or its shareholders, officers, directors, employees, agents, partners, principals, representatives, successors and assigns, depending on the context.

Under the GDPR, Pressbooks is a “data controller”. That means we collect personal data directly from you and determine the purpose and means of “processing” that data. “Processing” is a broad term that means collection, use, storage, transfer or any other action related to your personal data; it is used in this Policy in that way.

If you want to ask us anything about what’s in this Policy, or anything else privacy- or data- related, or exercise any of your available privacy rights, you can email:

Pressbooks Privacy Officer
privacy@pressbooks.com

Here is the mailing address for you as well:

Pressbooks Privacy Officer
5333 av. Casgrain, Suite 202
Montreal, Québec
Canada
H2T 1X3

If you have any questions about your account or the Services, we encourage you to contact the Pressbooks network manager at your Educational Institution.

Your Rights

You have the following rights regarding your personal data held by Pressbooks, and other privacy rights. Please note that not necessarily all of these rights may be available to you; this depends on the Data Protection Laws where you are located that apply to you. These rights may be exercised without affecting the price you pay for any of the Services, if any. Notwithstanding that, exercising certain of these rights may affect your ability to use some or all of the Services.

- The right to withdraw at any time your consent for Pressbooks to process your personal data;
- The right to have your personal data erased from Pressbooks’ records;
- The right to access your personal data and any relevant information around its processing and use;
- The right to have a copy of your personal data given to you in an easy to read format so that you can transfer it to any data processor;
- The right to have your personal data corrected or updated if you believe it is inaccurate or out of date;
- The right to opt out of marketing communications we send you, at any time;
- The right to know whether Pressbooks sells or shares your personal data (and if so, who gets it). Please refer to that information elsewhere in this Policy, though you can contact our Privacy Officer if you need additional information or clarifications;
- The right to demand that Pressbooks not sell your personal data;
- The right to restrict the processing of your personal data if it is inaccurate or if our processing or use of it is against the law; and
- The right to refuse any marketing or advertising targeted at you by Pressbooks.

If you wish to exercise any of these rights, please contact our Privacy Officer at the contact information above, or refer to certain relevant sections further in this Policy.

Personal Data Collected from You and What We Use It For

In the table below, please find all the personal data we may collect from you directly, what we use it for, and the legal basis under the GDPR for us having and processing this personal data. Under PIPEDA, the legal basis is your informed consent, and by submitting this personal data you acknowledge having granted this consent to Pressbooks.

Personal data category	Personal data processed	What we use it for (the “purpose” of processing)	Legal basis for processing under the GDPR
Contact Information submitted through a contact form	Your name, Educational Institution and email address	To communicate with you in reply to your inquiry	Your consent in giving us this information
User Information, when sent to us directly by you	Username (which may be a unique name, your Educational Institution ID, or Educational Institution’s network ID) and email address	To create an account for you, to communicate with you, and to provide you with access to the Services	Your consent

Where you have provided personal data further to your consent, if you withdraw your consent to use this personal data, we will no longer be able to provide certain Services, or the entirety of the Services, to you.

Personal Data Collected About You from Third Parties and What We Use It For

Sometimes we get personal data about you from third parties. This table explains the details about this personal data – what it is, where it came from, what we do with it, and legal basis for us having and processing this personal data under the GDPR. Under PIPEDA, the legal basis is your informed consent.

Personal data category	Personal data processed	Who we get the data from	What we use it for (the “purpose” of processing)	Legal basis for processing under the GDPR
User Information	Username (which may be a unique name, your Educational Institution ID, or Educational Institution’s network ID) and email address	Your Educational Institution who is a Customer of Pressbooks who has signed an agreement with us	To create an account for you, to communicate with you, and to provide you with access to the Services	Your consent and performance of a contract

Sensitive Personal Data

We do not collect any of what the GDPR considers sensitive personal data from you, unless you voluntarily submit it to us via our contact form or other method, which we encourage you not to do.

Who We Transfer Your Personal Data To

We routinely share some of your personal data with certain types of third parties who are identified in the table below along with what they do with it. Some of those third-party recipients may be based outside your home jurisdiction. If you are in the European Economic Area — please see the “Transfer of Your Personal Data Outside of the European Economic Area” further down in this Policy for more information including on how we safeguard your personal data when this occurs.

We will share personal data with law enforcement or other public authorities if: (1) we are required by applicable law in response to lawful requests, including to meet national security or law enforcement requirements; (2) if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, fraud, or situations involving potential threats to the safety of any person, or any violation of any Pressbooks contract that governs your relationship with us; or (3) if we believe it is necessary to investigate, prevent, or take action regarding situations that involve

abuse of the Services infrastructure or the Internet in general (such as voluminous spamming or denial of service attacks).

We may also share personal data: (1) to a parent company, subsidiaries, joint ventures, or other companies under common control with Pressbooks (in which case we will require such entities to honour this Policy); (2) if Pressbooks merges with another entity, is subject to a corporate reorganization, sells or transfers all or part of its business, assets or shares (in which case we will require such entity to assume our obligations under this Policy, or inform you that you are covered by a new privacy policy).

We will never share your personal data with other third parties except under these circumstances. We do not sell or rent your personal data to any third party for direct marketing purposes or any other purpose.

Personal data category	Who we transfer it to	What they do with it
Contact Information	Zendesk	Store it so we may retrieve it to reply to your inquiry
Contact information	Our third-party email services provider, specifically Gmail , and the other email providers listed in the <i>Email Communications</i> section below	Send you emails
User Information	Companies providing technical infrastructure for the Services, specifically Amazon AWS	Control your logging in to the Services so they can be provided to you, and record-keeping
Pressbooks analytics identifiers	Companies providing technical infrastructure for the Services, specifically Amazon AWS	Provide your Educational Institution with analytics as to how the Services are used
Third-party analytics identifiers, if your Educational Institution activates this feature	Companies that provide data analytics for the Services, specifically Google Analytics	Provide your Educational Institution with analytics as to how the Services are used

Tracking Technology (“Cookies” and Related Technologies)

Pressbooks uses tracking technology (“cookies” and related technology such as tags, pixels and web beacons) in the Services and by interacting with the Services you agree to their use. Cookies are small text files placed on your computer or device when you visit a website or use an online service, in order to track use of the site or service and to improve the user experience by storing certain data on your computer or device.

Specifically, we may use cookies and related technologies for the following functions:

- to enable your signing-in to the Services;

- to provide general internal and user analytics of the Services and to conduct research to improve the content of the Services using analytics programs listed above in this Policy;
- to remember the format of the last ebook you exported so that we may use that format as your default; and
- to assist in identifying possible fraudulent activities.

Your browser or device can be set to refuse cookies or delete them after they have been stored. You can refer to your browser's or device's help section for instructions, but here are instructions for the most commonly-used browsers and operating systems:

- [Google Chrome](#)
- [Mozilla Firefox](#)
- [Microsoft Edge](#)
- [Opera](#)
- [Apple Safari](#)
- [iOS](#)

Please note that deleting or blocking certain cookies may reduce your user experience by requiring you to re-enter certain information, including information required to use the Services. Furthermore, deleting certain cookies may prevent certain functions, or the entirety of the Services, from working at all.

Email Communications and Compliance with Anti-Spam Laws

Pressbooks uses [MailChimp](#) to manage our mailing list but this is only to network managers at Educational Institutions not to individual users of the Services, and [mailgun](#) to send out emails related to certain Services functions (MailChimp and mailgun, collectively the “**Email Service Providers**”). Personal data is transferred to the Email Service Providers in order to manage the mailing list and for the emails to be sent out properly. Your Contact Information is only used to send out emails; the Email Service Providers do not use this personal data for any other purpose, and will not transfer or sell your personal data to any other third party. For more information, please refer to [MailChimp's Security Policy](#) and [mailgun's Privacy Policy](#).

Network managers may unsubscribe from Pressbooks' mailing list at any time, by following the link at the bottom of those Pressbooks emails. Other types of emails, such as relational and emails related to the Services will not have an opt-out option as they are necessary for the use of the Services.

Pressbooks practices in regards to its email are designed to be compliant with anti-spam laws, including but not limited to the law unofficially called “CASL”, or Canada's Anti-Spam Law (S.C. 2010, c. 23). If you believe you have received email in violation of these laws, please contact us using the contact information further up in this Policy.

How We Protect Your Personal Data

We have implemented very strict technical and organisational procedures for ensuring that, by default, only personal data which are necessary for each specific purpose of the processing are

processed by us. These procedures prevent your personal data from being lost; or used or accessed in any unauthorised way.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable supervisory authority of a suspected data security breach where the Data Protection Laws requires us to do so, and within the time frame required by the applicable Data Protection Law.

Pressbooks uses only industry best practices (physical, electronic and procedural) in keeping any data collected (including personal data) secure. In addition, we use third-party vendors and hosting partners to provide the necessary hardware, software, networking, storage, and related technology required to operate the Services, and these third parties have been selected for their high standards of security, both electronic and physical. For example, Pressbooks uses [Amazon AWS](#), a recognized leader in secure data, for hosting of the Services and related data, and storage of data including personal data.

Finally, all information, including personal data, is transferred with encryption using Secure Sockets Layer (“SSL”) or Transport Layer Security (“TLS”), robust security standards for Internet data transfer and transactions. You can use your browser to check Pressbooks’ valid SSL security certificate when using the Services.

Transfer of Your Personal Data Outside of the European Economic Area (EEA)

For our European users, we endeavour to keep your personal data inside the EEA. Please note that if you are in Europe, the Services provided to you will be hosted on Amazon AWS servers located in Europe. Notwithstanding that, certain of our data processors (and Pressbooks) are in other countries where your personal data may be transferred. However, these countries are limited to countries with particular circumstances that protect your personal data, specifically:

- Canada. Canada has been determined to have an “adequate level of protection” for your personal data [under European data protection law](#).
- The United States. Your personal data is only transferred to companies in the United States that: (1) have concluded the [Standard Contractual Clauses](#) for the transfer of personal data outside the EEA; and (2) have signed agreements with us or have informed us that they are GDPR-compliant.

That’s it! You have the right, however, to refuse to have your data transferred outside the EEA. Please contact our Privacy Officer to make that request. Please note that making this request may prevent you from being able to use a portion or all of the Services.

Supervisory Authorities and Complaints

If you are in the EEA, under the GDPR you have the right to make a complaint to the appropriate supervisory authority. If you are not satisfied with the response received or the actions taken by our Privacy Officer, or if you would like to make a complaint directly about Pressbooks’s data practises, we invite you to contact the supervisory authority in your country. For example, if you are in the U.K., you should contact the Information Commissioner’s Office who is the supervisory authority.

You can [reach them in a variety of ways](#), including by phone (0303 123 1113 in the UK) and mail (Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF). If you are in France, you should contact the *Commission Nationale de l'Informatique et des Libertés* who is the supervisory authority there. Their contact information [can be found here](#).

The full listing of all Data Protection Authorities (the supervisory authorities) across the EEA [can be found here](#).

If you are in Canada and you are not satisfied with the response received or the actions taken by our Privacy Officer, you can make a complaint to the Office of the Privacy Commissioner of Canada. Instructions on how to do so can be found [on their website](#).

Data Retention

Your personal data will only be kept for as long as it is necessary for the purpose needed for that processing. For example, we will only retain your User Information for as long as you have an account with us to use the Services.

Automated Decision-Making

Pressbooks does not use any automated decision-making processes in providing the Services.

Children's Privacy Statement

The Services are not intended for children under the age of 16. We do not knowingly collect any personal data from a child under 16. If we become aware that we have inadvertently received personal data from a person under the age of 16 through the Services, we will delete such information from our records.

Changes to This Privacy Policy

The date at the top of this page indicates when this Policy was last updated. Every now and then, we will have to update this Policy, and we will update it no less than once every 12 months. You can always find the most updated version at this URL, and we will always post a notice on the Services if we make significant changes. If you have a Pressbooks account, we may also email you to tell you the Policy has been updated, and what the important changes are.