NANAIMO LADYSMITH
PUBLIC SCHOOLS

PART 1	
Application/Software Title (with links)	S*more https://www.smore.com/*
Developer	Fireplace (Smore Communications Ltd)
Privacy Policy, Terms of Use (links)	https://www.smore.com/privacy
Description of Application and its Educational Value (Refer to "About Us" page, if applicable) *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.*	Communicate more effectively with beautiful **Smore** newsletters. Send newsletters parents actually read. Share via email. Professional, easy to use. See simple analytics. Add photos, videos, links. Share on social media. Schools will create their newsletters and send to families via Smore platform or via district email.
PART 2	
Is this initiative a data-linking program under FOIPPA? *If yes, this PPIA must be submitted to the Office of the Information and Privacy Commissioner (OIPC). A data linking program is when multiple distinct data sets are used in conjunction with each other. (E.g. MyED information used in School Messenger)*	No
Is this initiative a common or integrated program or activity (CIPA)? *If yes, this PPIA must be submitted to the Office of the Information and Privacy Commissioner (OIPC). A CIPA 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.*	No
What Personal Information (PI) is involved? *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*	To sign up for an account, we only require your first name, last name, and email address.
Use *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?*	Any of the information we collect from you may be used in one of the following ways: *To provide the Website and Services* We use your information in order to provide you the features and functions made available to you on the Website and Services. *To personalize your experience* Your information helps us to better respond to your individual needs. (For example the Educator Hive is available to educators).

To improve our website and services
We continually strive to improve our website offerings and features available based on de-identified information, general log data, and usage statistics. We use information to tailor the content and information that we may send or display to users, to offer personalized content and instructions, and to otherwise personalize your experience while using the Service, including on various devices you may use to access the Service. We collect statistics to better understand how users access and use our Service, monitor the effectiveness of our Service, detect usage patterns, and to diagnose or fix technology problems. We also use information to demonstrate the effectiveness of the Service and perform research, and to develop, support, and improve our Service and other educational products and services. We also take into consideration all feedback we receive from you.

To improve customer service
Your shared and automatic information helps us to more effectively respond to your customer service requests and support needs. (You will never be asked to provide any password information). For example: Finding a recently deleted flyer/newsletter that needs to be restored or seeing the browser you are using to help determine a solution for a possible bug in the system.

To process transactions
Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the purchased product or service requested or as expressly provided in the section titled Disclosure of Your Data.

To send periodic emails
The email address you provide for order processing, may be used to send you information and updates pertaining to your order, in addition

	to receiving occasional company news, updates, related product or service information, etc. We use your information to provide transactional notifications for certain activities relating to your use of our Service. For example, we may send e-mail notifications to provide receipt for payment or other subscription notices. From time to time, we may send periodic promotional or informational e-mails to Educator or Team users. We do not use Student Data to send marketing communications, and we do not send marketing communications to student users. Note: If at any time you would like to opt-out or unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email. You may not opt out of service-related communications (e.g., account verification, transactional communications, changes/updates to features of the Service, technical and security notices). *Carry out core business operations* We may use the information for such core business operations such as accounting, filing taxes, and fulfilling regulatory obligations. *To promote safety and security and respond to legal process* We use information to promote the safety and security of our Service, our uses and other third parties. For example, we may use the information to authenticate users, facilitate secure payments, detect and prevent fraud and other harmful activities, respond to legal requests or claims, and enforce our terms and policies.
Disclosure *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)?*	Smore may share or disclose your personal information as needed to provide our Service or with your consent or permission. We may also share personal information in the circumstances described below. *With Your Consent* Smore will disclose your personal data in accordance with your direction. For example, we will transmit in accordance with your direction(s)

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any newsletter you send via the Services, including any personal data therein.

Service Providers

We may share your personal data with third party service providers who need access to your information in order to perform services for us as indicated above. Below is the current list of other third party providers, their purpose, and links to their respective privacy policies:

- Amazon (AWS) - web hosting
- Pipedrive - Sales platform for Organization accounts
- CustomerIO - user communication
- Facebook Pixels - for personalized facebook ad experience
- Helpscout - for customer support
- LogRocket - to analyze user interaction with new features
- Mailgun - email delivery system for the mailing list feature
- Profitwell - Payment processing
- Sentry - to identify site code errors and problems
- Google Maps - for event locations

Third parties with Consent or as Instructed

We share information with consent and at the direction of Educators and Team Users. For example, an Educator or Teacher may direct Smore to share specific information with another individual, such as when a teacher directs Smore to send a communication to a student. Similarly, we may share personal information with third parties, for example, if a School authorizes Google login or similar authentication tools for that School's user accounts.

Others within the School

Smore may share information collected from Educator or Team Users associated with other users or persons designated by the School, such as teachers and school administrators of that School. Content shared, emailed or posted by members of a School community, such as content between a teacher and students in a class, will be accessible by School administrators or other designated School users.

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Vendors and Service Providers
Smore may share information with our trusted vendors, third party service providers and individuals to provide services or products for us or on our behalf, which may include analytics, hosting, billing, advertising, and marketing (provided however, that Smore will not knowingly use any Student Data to target advertise or market). Vendors and service providers who have access to Student Data, if any, shall be contractually bound to uphold privacy and confidentiality terms no less protective than those provided herein.

Aggregate or De-Identified Information
We may share information in aggregated and/or anonymous form that cannot reasonably be used to identify an individual. For example, Smore may disclose aggregated user statistics (i.e., the total number or percentage of Smore users from a particular geographic region) in order to describe our Service to current and prospective partners and other third parties, and for other lawful purposes.

Merger or Sale
If Smore becomes involved in a merger, acquisition, bankruptcy, change of control, or any form of sale of some or all of its assets, your personal information may be transferred or disclosed in connection with the business transaction. In such an event, we will make efforts to provide notice before personal information is transferred and becomes subject to a different privacy policy. We will not transfer Student Data associated with Educator or Team accounts in the event of a merger or sale unless the recipient has committed to The Student Privacy Pledge principles or similarly stringent privacy protections, or we will provide Schools with notice and an opportunity to opt-out of the transfer of Student Data by terminating their accounts and any associated student users before the transfer occurs.

	Other/Legal Requirements Smore may release personal information if it has a good faith belief that access, use, preservation, or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process, or enforceable governmental request; (b) enforce applicable Terms of Service, including investigation of potential violations thereof; (c) detect, prevent or otherwise address fraud, security or technical issues; (d) protect the rights, property, or personal safety of Smore, its users, or the public; or (e) as required or permitted by law.
Security *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.*	The security of your personal information is very important to us. We have implemented a variety of physical, administrative and technological safeguards designed to preserve the integrity and security of the personal information we collect and to protect against unauthorized access to data. We implement a variety of security measures to maintain the safety of your personal information when you place an order or enter, submit, or access your personal information. We offer the use of a secure server. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our Payment gateway providers database only to be accessible by those authorized with special access rights to such systems, and are required to keep the information confidential. After a transaction, your private information (credit cards, identification numbers, financials, etc.) will not be stored on our servers. We regularly test our own security by checking how we collect, transmit, and store information. Security audits are completed on a quarterly basis by management together with the engineering team. In addition, if there is ever an attempt by an outside party to access, misuse, or breach any part of the website we have measures in place to protect personal information and to further strengthen the security practices.

	Other steps include internal reviews of our data collection, storage, and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where we store personal data. We restrict access to personal information to Smore employees, contractors, and agents who need to know that information in order to operate, develop, or improve our services. Our employees may be subject to disciplinary action, including termination, if they fail to meet privacy and confidentiality obligations.
PART 3	
Will any PI be stored outside Canada? *Yes or No. If No, skip to PART 4*	Yes
Is any of the PI 'sensitive'? *Click on link above to determine if PI is considered sensitive*	No
Where is the PI being stored? *Where, what regions are the PI being stored in, including backups. What hosting providers are being used?*	United States
PART 4	
Ownership and Retention of PI *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*	Both the School and/or the Educator have control over PII (Personally Identifiable Information) and have the right to review, delete and/or refuse to permit further collection or use of the student's information that may have been collected. This may in some cases limit the use of certain features and functions available on the website or prevent access altogether. Any information that may have been collected is kept for as long as the account is active in order to retain access to the content created (Flyers/Newsletters/"Smore's").
Accuracy of PI *Describe the provisions that allow individuals to request corrections to their PI held within the application/service*	The School may decide the content (Portfolio of work) created by a student is no longer needed, and it may be edited or deleted at any time, by accessing your account through the service. Questions, concerns, and inquiries can be emailed to privacy@smore.com.
PART 5	
Recommendation *Recommendation for **Approval**, **Abeyance/Suspension** (pending further review) or **Rejection**, based on a review and assessment of Privacy Risk.*	Approved

Smore PPIA (Provisional Privacy Impact Assessment)

For an approval, provide any applicable conditions of use and/or other risk mitigation measures advised to achieve an acceptable level of privacy risk	
PPIA Completed by (First & Last Name, Title)	Privacy Officer
Date of PPIA review and submission to NLPS Privacy Officer	2023-09-07
NLPS Privacy Officer Signature, Name and Date	Dale Burgos September 7, 2023