

Hi there!

Before you let your child log in to or otherwise access their Girls Who Code Club account, you should know what information we will collect from them. Scroll down to view our full Direct Notice disclosure, but here are the highlights:

- You will only give consent once for any child you create an account for (including additional children you later create an account for) or allow access to any part of the Girls Who Code club service (the "[Club Service](#)") You will not see this notice again for additional children you add.
- If your child is using a [Club Service](#) connected to school use ("[School Club](#)"), your child's teacher will have provided consent on your behalf under what is commonly known as "[school consent](#)" under the Children's Online Privacy Protection Act (COPPA).
- If your child is using a [Club Service](#) not connected to a school (e.g. a library or community center) (an "[Outside School Club](#)"), your child's club will have an adult "[Outside School Club Facilitator](#)" to support the [Club](#), but only you, as your child's parent/guardian, will have the ability to consent to your child's participation. You will be able to sign up for your child and consent through this webpage to their participation by creating a parent account and then registering your child.
- We never post or share your child's [Personal Information](#) publicly.
  - If your child is in a [School Club](#), the [Personal Information](#) in their [Club Student](#) profile will be visible to them, you as their parent, their [Teacher Facilitator](#), [Club Signatory](#), and their [School Club Administrator](#). Your child will also have the opportunity to ask and answer questions about their curricular activities, which will be visible to them, you as their parent, their [Teacher Facilitator](#), [Club Signatory](#), and the [School Club Administrator](#). Additionally, your child will be able to interact with a messaging board that is visible to other [Club Students](#) in their [Club](#), as well as you, their parent, and the [Teacher Facilitator](#), [Club Signatory](#), and [School Club Administrator](#). Finally, your child may post projects on the Project Gallery, which is visible to any user logged into [Clubs-HQ](#) (but not the general public).
  - If your child is in an [Outside School Club](#), the [Personal Information](#) in their [Outside School Club Child User](#) profile will be visible to themselves, you as their parent, their [Outside School Club Facilitator](#), [Club Signatory](#), and the [Community Partner](#) associated with their [Outside School Club](#). Your child will also have the opportunity to ask and answer questions about their curricular activities, which will be visible to them, you as their parent, their [Outside School Club Facilitator](#), [Club Signatory](#), and the [Community Partner](#) associated with their [Outside School Club](#). Additionally, your child

will be able to interact with a messaging board that is visible to other [Outside School Club Child Users](#) in their [Outside School Club](#), as well as you, their parent, the [Outside School Club Facilitator](#), [Club Signatory](#), and the [Community Partner](#) associated with their [Outside School Club](#). Finally, your child may post projects on the Project Gallery, which is visible to any user logged into [Clubs-HQ](#) (but not the general public).

- If your child is using Code at Home, or you or your child are using some of our virtual event activities where your child's data may be collected, and your child also has a Student Account, some of your child's data, including what may be considered [Student Data](#) or [Education Records](#) under the Family Educational Rights and Privacy Act (FERPA), will be used and shared between in school and out of school use (use not in connection with a school) and you are consenting to this use and sharing. See our [FAQ](#) for more details on what information is shared between [Outside School Child Accounts](#) and [Club Student Accounts](#).

### [View Girls Who Code's Privacy Notice for Children](#)

This disclosure for parents ("Direct Notice") provides important information you should consider when allowing your child (or children) access to certain Girls Who Code features when choosing to set up your child's Girls Who Code account or to allow them to log in to accounts previously created in school or to otherwise access the [Club Service](#). Please note that you will only be giving consent once and that it will also apply to any children that you subsequently allow future access to Girls Who Code accounts or the [Club Service](#) after your consent. We explain the information we collect for your child's use of Girls Who Code below. In order to create an account for your child or otherwise allow your child access to the [Club Service](#), you must review this Direct Notice of disclosure (including the [Girls Who Code Club Privacy Policy](#)) and give your consent below. Girls Who Code will not knowingly collect, use, or disclose your child's [Personal Information](#) unless you've provided this consent\*.

We will ask for your consent before we make any material changes to the practices described in this Direct Notice of disclosure (including the [Girls Who Code Club Privacy Policy](#)).

### **Girls Who Code May Collect the Following Information from Children Using the Service With an Account:**

- First and last name
- Birthday or date of birth
- Email address
- Parent email address (to get your consent and contact you about your child's account)

- Unique student code (provided by the teacher)
- A unique username and password
- Ethnicity or race
- Free or reduced lunch status
- Avatar images (optional)
- Photos
- Videos, including voice and audio information
- Uploaded files or documents, like a project submission on the Project Gallery
- Written notes, like messages or written content in a project submission
- Responses to [Teacher Facilitator](#) or [Outside School Club Facilitator](#) comments posted (or activities assigned)
- Contents of communications between children (ex. Two [Club Students](#) in the same [Club](#) communicating over messaging). The [Teacher Facilitator](#) or [Outside School Club Facilitator](#) can see, report, and erase any messages from their [Club Students](#) or [Outside School Club Child Users](#), respectively.
- Contents of communication between children and either their [Teacher Facilitator \(School Clubs\)](#) or their [Outside School Club Facilitator \(Outside School Clubs\)](#)—such as communicating on the Club message board within the [Club Service](#)
- IP address
- Cookie and other similar technologies
- Device-specific information, such as device ID, device type, operating system, and a device token (to send push notifications)
- Server log information and product event data (e.g., to track progress or internal analysis on product usage)
- Location information, but not precise geolocation
- Online status

The device and application-related data are collected from the device and application being utilized to give the child access to Girls Who Code accounts (e.g., the parent's device if the child is utilizing the parent's device, or the child's device if they are logging in separately on their own device).

Please see [this chart](#) for the detailed categories of information we collect from each [User](#) type.

### **Information Collected from Teachers or Parents Combined with Children's Data**

If your child is in a [School Club](#), your child's [Teacher Facilitator](#) may have provided your child's first and last name, student grade, class name, and school name and location, in which case that information will also be linked to your child's account along with any feedback the [Teacher Facilitator](#) has given to your child in connection with a [School Club](#), any content (including photos and videos) added to your child's account by the [Teacher Facilitator](#), and any activities assigned by the [Teacher Facilitator](#) or comments

from your child's [Teacher Facilitator](#) on these activities. Your child's [School Club Personal Information](#) can only be viewed on GWC [Clubs-HQ](#) by your child, your child's [Teacher Facilitator](#), your connected parent account, other [Teacher Facilitators](#), or the [School Club Administrator](#). Other children in your child's [School Club](#) may see any content you or your child's [Teacher Facilitator](#) added to comments on the Club messaging board or on any project your child submitted to the Project Gallery.

Additionally, when creating either (i) your child's [Club Student Account](#) (if not previously provided by your child or your child's [Teacher Facilitator](#)), or (ii) your child's [Outside School Club Child Account](#) (for use with [Outside School Clubs](#)), you may provide your child's name, date of birth or age, your child's race and ethnicity, free or reduced lunch eligibility, grade, email, geographical location and the country information for your child. You may also provide your own [Personal Information](#) as their parent (name, email, password) and the option to include your relationship to your child ("Parent Provided Information"). Some Parent Profile Information will be visible on your child's profile, and some will not.

- Parent-provided information that gets added to your child's account: name, date of birth or age, and, for [Outside School Clubs](#) explicitly, geographical location. This information will be visible to not only you but also your child and either (i) your child's [Teacher Facilitator](#) (if in a [School Club](#)) or [Outside School Club Facilitator](#) (if in an [Outside School Club](#)). Additionally, Parent Provided Information will also be linked with the information that your child's [Teacher Facilitator](#) ([School Club](#)) or [Outside School Club Facilitator](#) ([Outside School Club](#)) provides to your child over [Clubs-HQ](#).
- Any other information provided by a parent to [Clubs-HQ](#) (e.g. Response to your child's Project) is only visible to you and your child and is not visible to any other [Clubs-HQ User](#).

For all parent-provided information, we also collect product events (e.g., views on curriculum activities, etc.). These are collected to provide the [Club Services](#), including for internal analysis of product usage and quality. We may also use it to track progress in the [Club Service](#), and for sending email notifications to the parents, [Teacher Facilitator](#), or [Club Student](#) device to encourage them to take certain actions in the Girls Who Code [Club Service](#).

### **Visibility of Children's Personal Information**

Please note that we do not knowingly post any of your child's [Personal Information](#) to the general public online. [Personal Information](#) on your child's profile, whether shared by their [Teacher Facilitators](#) (if a [School Club](#)) or [Outside School Club Facilitator](#) (if an [Outside School Club](#)), you (their parent), or your child, will only be visible to you, your child, and either (i) their [Teacher Facilitator](#), [School Club Administrator](#), or [Club](#)

[Signatory](#) associated with their [School Club](#), or (ii) their [Outside School Club Facilitator](#), [Community Partner](#) associated with their [Outside School Club](#), or the [Club Signatory](#) associated with their [Outside School Club](#).

For [School Clubs](#), your child may also post a Project on the [Clubs-HQ](#) Project Gallery, which is visible to all [Clubs-HQ Users](#), or to their Club's message board, which is visible to all children in their [Club](#). Your [Teacher Facilitator](#) may allow this participation under what is commonly known as "[school consent](#)" under COPPA.

For [Outside School Clubs](#), if you have given your consent as a parent by signing up your child for an [Outside School Club Child Account](#), your child may also post a Project on the [Clubs-HQ](#) Project Gallery, which is visible to all [Clubs-HQ Users](#), or to their Club's message board, which is visible to all children in their [Club](#).

Please see [here](#), for more details on what other children may see about your child while engaging in a [School Club](#) or an [Outside School Club](#) and how children can interact with each other.

### **Retention of Children's Personal Information**

We will not retain a child's [Personal Information](#) for any longer than is necessary for [Educational Purposes](#) or legal obligations, or to provide the [Club Service](#) for which we receive or collect the child's [Personal Information](#), including if a child's parent directs us to retain certain content (such as student-generated content). Additionally, we only keep a child's [Personal Information](#) for as long as his or her [Club Student Account](#) or [Outside School Club Child Account](#) is [active](#), unless we are required by law or the child's school (for [Club Student Accounts](#)) to retain it, need it to ensure the security of our community or our Service, or to enforce our Terms. Learn more about how we delete [Club Student Accounts](#) [here](#). Please note that certain content (i) within a [Club Student Account](#) (uploaded by the [Club Student](#), [Teacher Facilitator](#), or parent); or (ii) uploaded by a [Teacher Facilitator](#), parent, or [Club Student](#) through [School Club](#) use may be kept after deletion of a [Club Student Account](#) as we are required to retain these at the direction of the school (e.g., for legal compliance reasons such as maintenance of "[Education Records](#)" under FERPA or "[Student Data](#)" under state student privacy laws or equivalent laws internationally). This content may also include student-generated content selected by you as the student's parent to be retained by us. Please see our [FAQ](#) about how to request deletion of this content. For more information on the deletion of content related to our [Outside School Club Child Accounts](#), please see our [FAQ](#), Girls Who Code will also delete [inactive Outside School Club Child Accounts](#) after 12 months.

Please see our [Information Transparency Chart](#) for more details on specific retention periods.

### **Access, Correct, or Delete Children's Personal Information**

You may access your child's information to correct or update their information by contacting us at [privacy@girlswhocode.org](mailto:privacy@girlswhocode.org). You may access your child's information to request deletion or further collection and use of their information by contacting us at [remove@girlswhocode.org](mailto:remove@girlswhocode.org). Please note, however, that some content within a [Club Student Account](#) will be kept after deletion of the account for school legal compliance reasons (e.g., maintenance of "[Education Records](#)" under the Family Educational Rights and Privacy Act (FERPA) or "[Student Data](#)" under state student privacy laws or equivalent international laws) and will not be deleted until we receive direction from the school. If you would like this information deleted, please reach out to your child's school first.

### **Sharing of Student Data or Educational Records for Outside School Use**

If your child is using an [Outside School Club Child Account](#), or you or your child are using some of our Code at Home activities, some of your child's data, including what may be considered [Student Data](#) or [Education Records](#) under the Family Educational Rights and Privacy Act (FERPA), will be used and shared between in school and out of school use (use not in connection with a school) and you are consenting to this use and sharing. See our [FAQ](#) for more details on what information is shared between [Outside School Child Accounts](#) and [Club Student Accounts](#).

---

\*Note that your child's school may have acted as your agent and consented on your behalf prior to you setting up your child's [Outside School Club Child Account](#) or otherwise allowing them access to the Service as is allowed under COPPA - commonly referred to as "[school consent](#)." Please read more in our [FAQ](#). If so, and the [Teacher Facilitator](#) is allowing students to use Girls Who Code in a [School Club](#), then the information listed above may have been previously collected prior to your consent here. Please contact your child's [Teacher Facilitator](#) if you have any additional questions. Any [Club Student Account](#) created by (1) you on your child's behalf (rare occasion); (2) your child's [Teacher Facilitator](#) on your child's behalf; or (2) your child will be linked together as one [Club Student Account](#) (these are not different accounts).

Additionally, for technological reasons, if your child's [Teacher Facilitator](#) has not previously consented on your behalf through "[school consent](#)," we may collect IP address and device-specific information prior to obtaining your consent, but will only use this information for the purpose of providing support for the internal operations of our [Club Service](#) prior to receiving your consent.

**Check Box language:**

I agree to the above terms and consent to the use of some of my child's [Educational Records](#) to be used by Girls Who Code for non-school purposes in [Outside School Clubs](#).