

## We need parental consent to continue.

Hi there!

Before you let your child log in to or otherwise access their Girls Who Code Clubs 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 Clubs service (the "[Clubs Service](#)") You will not see this notice again for additional children you add.
- If your child is using a [Clubs Service](#) connected to school use ("[School Clubs](#)"), your child's teacher may 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 [Clubs Service](#) not connected to a school (e.g. a library or community center) (an "[Outside School Clubs](#)"), your child's club will have an adult "[Outside School Clubs 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 [Clubs Student](#) profile will be visible to them, you as their parent, their [Teacher Facilitator](#), [Clubs Signatory](#), and their [School Clubs 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](#), [Clubs Signatory](#), and the [School Clubs Administrator](#). Additionally, your child will be able to interact with a messaging board that is visible to other [Clubs Students](#) in their [Club](#), as well as you, their parent, and the [Teacher Facilitator](#), [Clubs Signatory](#), and [School Clubs 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 Clubs Child User](#) profile will be visible to themselves, you as their parent, their [Outside School Clubs Facilitator](#), [Clubs Signatory](#), and the [Community Partner](#) associated with their [Outside School Clubs](#). 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 Clubs Facilitator](#), [Clubs 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 Clubs Child Users](#) in their [Outside School Club](#), as well as you, their parent, the [Outside School Clubs Facilitator](#), [Clubs 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 Girls Who Code independently or as part of a Girls Who Code activity outside of Clubs in [Direct Services](#) (ex. GWC Challenge), 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 [Clubs 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 detail on what information is shared between [Outside School Clubs Child Accounts](#), [Outside School Minor Accounts](#), and [Clubs Student Accounts](#).
- Before we can provide your child with access to the Club Service, we need your consent. Under the U.S. Children's Online Privacy Protection Act and its implementing regulations under the Children's Online Privacy Protection Rule (collectively, "COPPA"), parental consent is required for the collection, use or disclosure of personal information from children under the age of 13. Girls Who Code will not knowingly collect, use, or disclose your child's [Personal Information](#) unless you've provided this consent\*.

### [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 [Clubs 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 [Clubs 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 [Clubs Service](#), you must review this Direct

Notice of disclosure (including the [Girls Who Code Privacy Notice for Children](#)) and give your consent below.

We will also 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 Clubs Privacy Policy](#)). Please also see our [short video](#) for children that highlights the most important details in our Children's Privacy Policy that they should know about.

### **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
- 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 Clubs Facilitator](#) comments posted (or activities assigned)
- Contents of communications between children (ex. Two [Clubs Students](#) in the same [Club](#) communicating over messaging). The [Teacher Facilitator](#) or [Outside School Clubs Facilitator](#) can see, report, and erase any messages from their [Club Students](#) or [Outside School Clubs Child Users](#), respectively.
- Contents of communication between children and either their [Teacher Facilitator \(School Clubs\)](#) or their [Outside School Clubs Facilitator \(Outside School Clubs\)](#)—such as communicating on the Clubs message board within the [Clubs 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**

Teacher Facilitators, Outside School Clubs Facilitators, and parents may provide the information set forth below about a child which we will link or combine with the information listed above that we collect from the child.

#### *Teacher Facilitators about Clubs Students (e.g. your child)*

In creating an account for your Clubs Student, If your child is in a [School Club](#), your child's [Teacher Facilitator](#) may have provided your child's first name only. We then generate a unique username and password for the [Teacher Facilitator](#) to distribute. We don't ask [Clubs Student Users](#) to enter any other [Personal Information](#) for their account registration when a [Teacher Facilitator](#) sets up their account.

#### *Parent about Outside School Clubs Child User (e.g. your child)*

In creating an account for your Outside School Clubs Child User, If your child is in an Outside School Club, If they choose to do so, the parent will first need to create a parent account. The parent can then create an [Outside School Clubs Child Account](#) for their child. The parent may provide their child's first name, last name, relationship to them, a unique username or email and password for their child to access their [Outside School Clubs Child Account](#). After creating the account for their child, they will enter the Outside School Clubs code provided by the Outside School Clubs Facilitator (via email or directly). After confirming they are enrolling their child in the correct Outside School Club, the parent may provide the additional information set forth in the "Education and Other Demographic Information" and "Location Information" sections of the [Girls Who Code Children's Privacy Policy](#). Once the child is connected to an Outside School Club, the parent may also access the [Outside School Clubs Child Account](#) through their parent account.

Additionally, when creating either (i) your child's [Clubs Student Account](#) (if not previously provided by your child or your child's [Teacher Facilitator](#)), or (ii) your child's [Outside School Clubs Child Account](#) (for use with [Outside School Clubs](#)), you may provide your child's name, date of birth or age, 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 Clubs 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 Clubs Facilitator \(Outside School Clubs\)](#) provides to your child over [GWC Clubs-HQ](#).

Any other information provided by a parent to [GWC 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 [GWC 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 [Clubs Services](#), including for internal analysis of product usage and quality. We may also use it to track progress in the [Clubs Service](#), and for sending email notifications to the parents, [Teacher Facilitator](#), or [Clubs Student](#) device to encourage them to take certain actions in the Girls Who Code [Clubs Service](#).

### **How We Use the Information**

Information collected from children as part of their participation in the Services (or information provided by a Teacher Facilitator, Outside School Clubs Facilitator, or parent, including Personal Information and information collected automatically) is never used or disclosed for [third-party advertising](#). We also do not place any third-party advertisements in areas of the Clubs Service where children are logged in. Additionally, Personal Information collected from children is never used for [behaviorally-targeted advertising](#) to children by us or any third-party. We may present [contextually](#) relevant educational content (not using children’s Personal Information) for either our own products (e.g., GWC Challenge) or third-party products and services ourselves that we believe may be of interest to a child.

In addition to the uses mentioned above, we use the information we collect from children (or about children from parents or Teacher Facilitators and Outside School Clubs Facilitators:

- To provide and improve (as allowed by law) the Service, including administering our Clubs Services, to send notifications to your child (e.g. to encourage them to take certain actions in the Clubs Service)
- For internal analytics on product usage

- For [educational purposes](#) and as allowed by law
- To identify, fix and troubleshoot bugs and Clubs Service errors
- For security and safety purposes, including enforcing our Terms
- To comply with legal process or other laws

## **Disclosure of Information**

We do not disclose any personal information about children to third parties, except to [service providers](#) necessary to provide the Clubs Services, other users as part of the Clubs Services (such as Teacher Facilitators or Outside School Clubs Facilitators), as directed or approved by the child's parents or legal guardians, as required by law, or to protect the security of the Clubs Service or other users.

We may share aggregate or [de-identified](#) information, which cannot reasonably be used to identify your child, with third parties for various purposes, including compliance with various reporting obligations; to demonstrate how the Clubs Service is used; for business purposes; or to assist third parties in understanding our users' interest, habits, and usage patterns for certain programs.

---

## **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 Clubs 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 Clubs Administrator](#), or [Clubs Signatory](#) associated with their [School Club](#), or (ii) their [Outside School Clubs 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 [GWC Clubs-HQ](#) Project Gallery, which is visible to all [GWC 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. Your [Teacher Facilitator](#) may also block this option if the school district does not allow engagement between Clubs.

For [Outside School Clubs](#), if you have given your consent as a parent by signing up your child for an [Outside School Clubs Child Account](#), your child may also post a Project on the [GWC Clubs-HQ](#) Project Gallery, which is visible to all [GWC 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 and users may see about your child while engaging in a [School Club](#) or an [Outside School Club](#) and how children can interact with each other and other users.

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

We will not retain a child's [Personal Information](#) for any longer than is necessary to fulfill the purpose for which the information was collected, including for [Educational Purposes](#), or to provide the [Clubs 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), to keep our Clubs Services safe and secure, or comply with legal obligations. Additionally, we only keep a child's [Personal Information](#) for as long as his or her [Clubs Student Account](#) or [Outside School Clubs Child Account](#) is [active](#), unless we are required by law or the child's school (for [Clubs Student Accounts](#)) to retain it, need it to ensure the security of our community or our Service, or to enforce our Terms. Specifically, we implement the following policies:

- **Deleting inactive Outside School Clubs Child Accounts and Student Accounts:** Girls Who Code will delete [inactive Outside School Clubs Child Accounts](#) and Student Accounts after 12 months (meaning no child has logged into either their Outside School Clubs Child Account or Student Account within the last 365 days). Learn more about how we delete inactive Student Accounts and Outside School Clubs Accounts [here](#). Please note that certain content (i) within a [Clubs Student Account](#) (uploaded by the [Clubs Student](#), [Teacher Facilitator](#), or parent); or (ii) uploaded by a [Teacher Facilitator](#), parent, or [Club Student](#) through [School Clubs](#) use may be kept after deletion of a [Clubs 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.

Please see our [Information Transparency Chart](#) for more details on specific retention periods. Additionally, for more information on the deletion of content related to Clubs Student Accounts and Outside School Clubs Child Accounts, please see our FAQ.

We may retain [de-identified](#) information for as long as we deem appropriate or as otherwise required by law.

## **Parental Choice and Controls**

At any time, you have the right to:

- Access, review, or request a correction and/or update your child's information;

- Direct us to delete your child’s information;
- Refuse to permit us to collect further Personal Information from your child online and request that we delete the Personal Information that we have already collected from your child; and
- Agree to the collection and use of your child’s Personal Information, but choose not to allow disclosure to certain third parties (unless disclosure is integral to the Clubs Service).

Please keep in mind that a request to delete information or refusal to permit disclosure of the information to third parties may affect your child’s ability to access the Clubs Services or use certain features. To exercise any of these rights on behalf of an Outside School Child User, please contact us at [privacy@girlswhocode.com](mailto:privacy@girlswhocode.com). If you are a parent of a Clubs Student User, please reach out to your child’s school to exercise these rights. For more information on exercising your rights, visit the “Parental Choices” section of the [Girls Who Code Children’s Privacy Policy](#).

Please note, however, that some content within a [Clubs 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 Girls Who Code independently or as part of a girls Who Code activity outside of clubs in [Direct Programming](#) (ex. GWC Challenge), an [Outside School Clubs Child 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 [Clubs 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 Clubs 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 [Clubs 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 (3) your child will be linked together as one [Clubs 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 [Clubs 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](#).**