



# Children's Clubs Privacy Policy

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## HOW DOES GIRLS WHO CODE PROTECT CHILDREN'S PERSONAL INFORMATION?

Protecting children's privacy is especially important to us - we're educators and parents ourselves, after all. We follow a set of principles intended to safeguard student privacy, including responsible stewardship, protection, and transparent handling of student [Personal Information](#).

We have a [Student Data Privacy Addendum](#), an agreement we enter into with schools, that further describes our duties, responsibilities, and commitments with respect to [Student Data](#) that we collect or receive.

This Children's Privacy Policy explains our information, collection, disclosure, and parental consent practices with respect to information provided by children in relation to our [Clubs Services](#), and uses terms that are defined in our general [Club Privacy Policy](#). For our full Club Privacy Policy, please see [here](#). Any terms not defined in this Children's Privacy Policy are defined in the [Club Privacy Policy](#).

Girls Who Code voluntarily aligns portions of this policy with the U.S. Children's Online Privacy Protection Act and its implementing regulations under the Children's Online Privacy Protection Rule (collectively "COPPA"). Girls Who Code voluntarily follows COPPA: as a non-profit, Girls Who Code is not actually subject to COPPA. COPPA expressly states that the law applies to commercial websites and online services, and not to nonprofit entities that otherwise would be exempt from coverage under Section 5 of the FTC Act. Although nonprofit entities generally are not subject to COPPA, the FTC encourages such entities to post privacy policies online and to provide COPPA's protections to their child visitors. For more information, please see the [FTC's FAQ](#) (Section B).



In addition, this Children’s Privacy Policy also covers children aged 13 – 17 (“Minors”). When using the term “Child” in this Children’s Privacy Policy we are referring to children under the age of 13, and the term “children” refers to both a child and a Minor.

Girls Who Code extends the U.S -based COPPA consent protections in all jurisdictions, even if not required. If we rely on other legally applicable grounds for processing children’s [Personal Information](#) (e.g. if we rely on legitimate interest in the European Union and the United Kingdom), we will still use the FTC COPPA consent methods described to provide further transparency for parents.

Basically,

Girls Who Code extends the U.S.-based COPPA consent protections to all jurisdictions, even if not required. Girls Who Code voluntarily complies with some portions of COPPA, even though, as a non-profit organization, Girls Who Code is not subject to COPPA.

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## WHAT INFORMATION DOES GIRLS WHO CODE COLLECT FROM CHILDREN?

The statements we make regarding the information we collect from or about students and children using the [Club Services](#) differentiates those student and child accounts as follows: accounts for children in a [School Clubs](#) (“[Club Student Account](#)”), a child in a non-school based club (such as a library or community center) (“[Outside School Club Child Account](#)”), or children 13-17 in a non-school based club (“[Outside School Minor Account](#)”). [Users](#) with either an [Outside School Club Child Account](#) or [Outside School Minor Account](#) are collectively referred to as “[Outside School Learner Users](#)”. How we use information applies equally to all [Club Student Users](#) and [Outside School Learner Users](#) regardless of their age. Accordingly, where this Children's Privacy Policy references [Club Student Users](#) and [Outside School Learner Users](#), or any information collected from or about [Club Student Users](#) or [Outside School Learner Users](#), it applies to [Club Student Users](#) and [Outside School Learner Users](#) under 13 years old and over 13 years old. Please note, however, that for [Outside School Club Child Users](#) and [Outside School Minor Users](#), we have different data retention policies as this information would not be retained beyond account deletion as may be required under FERPA or other state student privacy laws (or equivalent laws in international jurisdictions) for “[Education Records](#)” or “[Student Data](#).”

Girls Who Code collects the minimal amount of information from [Club Student Users](#) and [Outside School Learner Users](#) necessary to register for a [Club](#) account on the [Club Services](#). Additionally, Girls Who Code will not condition a child’s participation in an online activity on the [Club Service](#) on the child providing more information than is reasonably necessary to participate in that activity. This



information is necessary to enable us to comply with legal obligations and given our legitimate interest in being able to provide and improve the [Club Service](#) and for security and safety purposes. For more detail on the categories of [Personal Information](#) collected from [Club Student Users](#) and [Outside School Learner Users](#), as well as the sources from which the information was collected, the purposes for which the information was collected, and the third parties with whom we disclose such [Personal Information](#) for a business purpose, please see [here](#).

- **[Club Student Account](#)**

Currently, [Club Student Accounts](#) used for Clubs in school (“[School Clubs](#)”) are created in the following ways: (1) by the student’s teacher (“[Teacher Facilitator](#)”) providing a [School Club](#) code to the [Club Student User](#); (2) by the [Club Student User](#) themselves; or (3) in rare cases, by the parent.

(1) *By the [Teacher Facilitator](#)*: If a [Club Student User](#)’s school or [Teacher Facilitator](#) elects to utilize [Club Student Accounts](#) in school in connection with [School Clubs](#) or otherwise sets up a [Club Student Account](#), the school will be responsible for providing [parental consent](#) under COPPA. [Teacher Facilitator](#)’s may provide parental consent through what is commonly referred to as “[school consent](#)” under COPPA, where [Teacher Facilitator](#)’s have certified that they are acting as the agent of the parent and consenting on the parent’s behalf to create the [Club Student Account](#) on behalf of the [Club Student Users](#) and let [Club Student Users](#) use the [Club Service](#) for [Educational Purposes](#). For clarity, while it is Girls Who Code’s obligation to comply with COPPA as a whole, we rely on schools to provide consent under COPPA by acting as the agent of the parent, but only after providing the school with the required notices set forth [here](#). For more information on “[school consent](#)” under COPPA, please see the [FTC's FAQ Section N](#) as well as the FTC’s [Policy Statement on Education Technology and COPPA](#).

The [Teacher Facilitator](#) will provide the [Club Student User](#) with a [School Club](#) code (either via email or a printable code in class) to enable the student to set up their [Club Student Account](#) by sharing their name, date of birth, ethnicity, free and reduced lunch status, and country of residence. If the [Club Student User](#) does not have the [School Club](#) code, they will not be able to set up their [Club Student Account](#). After doing so, if the [Teacher Facilitator](#) is creating the [Club Student Account](#), the [Teacher Facilitator](#) will be able to share a [student login method](#). Additionally, [Teacher Facilitator](#)’s may choose to allow [Club Student Users](#) to log in on the [Club Service](#) using their Google for Education or other Google Accounts (“Google Login(s)”). We don’t ask [Club Student Users](#) to enter any other [Personal Information](#) for their account registration when a [Teacher Facilitator](#) sets up their account.

(2) *By the [Club Student User](#)*: Alternatively, a [Teacher Facilitator](#) may choose to allow [Club Student Users](#) to set up their own [Club Student Account](#). When [Club Student Users](#) set up their own [Club Student Account](#), we may ask [Club Student Users](#) to provide a unique username (or their first and last name), their email, date of birth, grade level, ethnicity, freed and reduced



lunch status, country of residence, and a password and their [School Club](#) code. A [Club Student User](#) may also sign up with Google Login. We don't ask [Club Student Users](#) to enter any other [Personal Information](#) when setting up a [Club Student Account](#). [This chart](#) details the [Personal Information](#) we collect, how we use it, and where it is stored.

(3) *By the parent:* On rare occasions, if a [Club Student Users](#) is not using “[school consent](#)”, a parent may set up a [Club Student Account](#) for their child. A parent will first need to create a parent account and can then sign up for their child. In accordance with COPPA, we may ask the parent to provide the date of birth or age of their child, and if the child is under 13, we will also then seek to obtain [parental consent](#) in order to proceed with creating their child's [Club Student Account](#). If a parent connected to their child through an invitation from their child's school, we don't ask the child's parent for any additional information regarding their child during the [Club Student Account](#) creation but link the account to the code provided by the [Teacher Facilitator](#). The parent may choose to provide additional information, such as their child's date of birth. Once the child is connected to a school, the parent may also access the [Club Student Account](#) through the [student login methods](#).

Parents can also set up their parent account without connecting to their child's class, but will not be connected to their child's [School Club](#) (or any activity on their child's account in school). If the parent is not connected to their child's [School Club](#), the parent must provide their child's name (last name is at the option of the parent), date of birth, or age and can create the [Outside School Club Child Account](#) (for a child) or [Outside School Minor Account](#) (for a Minor). Once we have obtained [parental consent](#), the child's [Outside School Club Child Account](#) (for an [Outside School Club Child User](#)) will be set up and accessible from the parent account.

- **[Outside School Club Child Account](#) or [Outside School Minor Account](#) Creation for an [Outside School Learner User](#)**

(1) *By the [Outside School Learner User](#):* When an [Outside School Learner User](#) sets up their non-school club (“[Outside School Club](#)”) account, we may ask them to provide a first and last name, age or date of birth, country of residence, ethnicity, and free and reduced lunch status. Consistent with the requirements of COPPA, for an [Outside School Club Child User](#) in particular, we may only also ask for the child's name, age or date of birth, and parent or guardian email address from the child so we can seek verifiable [parental consent](#) or provide parental notice (as applicable) prior to allowing the child further access to the [Club Service](#) or collecting any additional [Personal Information](#) from the child. If the child is under 13, we will only use the information the child has provided in order to determine whether or not they are under 13 and thus require a parent to create an account. We will not use parent emails provided this way to market our [Club Service](#) to the parent unless the parent has opted into email marketing or has separately created an account on our [Club Service](#). Alternatively, we may require that the parent create the [Outside School Club Child Account](#) directly, as set forth below.



(2) *By the parent:* For an [Outside School Learner User](#), a parent may set up an [Outside School Club Child Account](#) or an [Outside School Minor Account](#). A parent will first need to create a parent account and can then sign up for their child or minor. In accordance with COPPA, we may ask the parent to provide the date of birth or age of their child or minor, and if the child is under 13, we will also then seek to obtain [parental consent](#) in order to proceed with creating their child's [Outside School Club Child Account](#). If a parent connected to their child through an invitation from their child's [Outside School Club](#), we may ask the parent for additional information to register their child, including their child's first and last name, age or date of birth, ethnicity, free and reduced lunch status, and country. Once the child is connected to a school, the parent may also access their child or minors' account through the [student login methods](#).

Parents can also set up their parent account without connecting to their child or minors [Outside School Club](#).

Overall, any [Club Student Account](#) (or access to a [Club Student Account](#)) created for the Club Student by the [Teacher Facilitator](#), by the Club Student directly or, in rare cases, by the parent, may be stored together on [GWC Clubs-HQ](#) and/or connected via a single log in. Additionally, any [Outside School Minor Account](#) may also be stored with the [Club Student Account](#) on [GWC Clubs-HQ](#) and/or connected to [User](#) via a single long in (if both exist), but only certain content will be viewable by the child's [Teacher Facilitator](#) and/or [Outside School Club Facilitator](#).

- **Information Collected from [Teacher Facilitators](#), [Outside School Club Facilitators](#), or parents Combined with Children's Data**
  - In [School Clubs](#): Your child's [Teacher Facilitator](#) may have provided your child's email address (to send them their [School Club](#) code, first and last name, age or grade (or grade level or graduation year), class name, [Teacher Facilitator](#) name; any custom avatar they created for the [Club Student User](#), the list and names of classes the [Club Student User](#) is in, and school name, address and location. The [Teacher Facilitator](#) may also provide information regarding the [Club Student User](#)'s reduced or free lunch status as well as aggregate information on the [School Club](#)'s race/ethnicity makeup. This information will also be linked to the [Teacher Facilitator](#)'s account along with any feedback, including messages on the message board and responses to curricular questions, the [Teacher Facilitator](#) has given in the [School Club](#) to your [Club Student User](#), any content (including photos, videos, and materials on the Project Gallery) the [Teacher Facilitator](#) added to your [Club Student User](#)'s account, and any activities or projects assigned by the [Teacher Facilitator](#) or comments from your [Club Student User](#)'s [Teacher Facilitator](#) on these activities or projects. Your child's and Minor's feedback and comments on their message board and curricular activities can only be viewed on Girls Who Code by your child, the [Teacher Facilitator](#), your connected parent accounts, [School Club Administrators](#), or [Club Signatories](#) connected to your child's club, and other [Club](#)



[Student Users](#) in your child's [School Club](#). Comments and materials posted in the Project Gallery by your child are visible to all [Users](#) who have a [GWC Clubs-HQ](#) log-in, but not the general public.

- [Outside School Clubs](#): Your child or minor's [Outside School Club Facilitator](#) may have provided your child or minor's first and last name, age or grade (or grade level or graduation year), class name, [Teacher Facilitator](#) name; any custom avatar they created for the [Outside School Learner User](#), and the location of the [Outside School Club](#). Specifically for [Outside School Minor Users](#), the minor's email address (to send them their [School Club](#) code) may be collected. Specifically for the [Outside School Club Child Users](#), the child may provide your parent's email address, for purposes of sharing information with you as a parent to set up the [Outside School Club Child Account](#) through your parent account and to gain parent consent. The [Outside School Club Facilitator](#) may also provide aggregate information on the [Outside School Club's](#) race/ethnicity makeup and/or free and redacted lunch status. This information will also be linked to the [Outside School Club Facilitator's](#) account along with any feedback, including messages on the message board and responses to curricular questions, the [Outside School Club Facilitator](#) has given in the [Outside School Club](#) to your [Outside School Learner Users](#), any content (including photos, videos, and materials on the Project Gallery) the [Outside School Club Facilitator](#) added to your [Outside School Learner User's](#) account, and any activities or projects assigned by the [Outside School Club Facilitator](#) or comments from your [Outside School Learner User's](#) to the [Outside School Club Facilitator](#) on these activities or projects. Your child's and Minor's feedback and comments on their message board and curricular activities can only be viewed on Girls Who Code by your child, the [Outside School Club Facilitator](#), your connected parent accounts, [Community Partners](#), or [Club Signatories](#) connected to your child's [Outside School Club](#), and other [Outside School Learner Users](#) in your child's [School Club](#). Comments and materials posted in the Project Gallery by your child are visible to all [Users](#) who have a [GWC Clubs-HQ](#) log-in, but not the general public.

- **User Content - Photos, Videos, Documents, Comments, Messages, and Projects posted by [Club Student Accounts](#), [Outside School Club Child Accounts](#), or [Outside School Minor Accounts](#)**

Once a [Club Student Account](#) or [Outside School Club Child Account](#), or an [Outside School Minor Account](#) is created (whether created by the [Club Student User](#), [Teacher Facilitator](#), [Outside School Minor User](#), [Outside School Club Facilitator](#), or parent, and [parental consent](#) is obtained as needed (including through [school consent](#) for [Club Student Accounts](#)), children will be able to post in their [Club Student Accounts](#), [Outside School Club Child Account](#), or [Outside School Minor Account](#). This includes responding to curricular activities and questions and answers, their Club's messaging board, or coding projects on Project Gallery, or adding



content such as photos, videos including voice and audio information, written notes, coding projects, and uploaded files or documents to their [Club Student Accounts](#), [Outside School Club Child Account](#), or [Outside School Minor Account](#) - which will be collected by Girls Who Code once the content has been actively saved by the student, child or Minor within the Clubs Service.

Some content uploaded by a [Club Student User](#) in their [Club Student Account](#) in the [School Clubs](#), or by their [Teacher Facilitator](#), or parent, may also be connected to content in the event they also have an Outside School Club Child Account or [Outside School Minor Account](#); however, certain content uploaded in the [Outside School Club Child Account](#) or [Outside School Minor Account](#) will not be viewable by the [Teacher Facilitator](#) in the [Club Student Account](#), and vice versa. Please see our [FAQ](#) for more details.

- **Posting and Viewing on Project Galleries through [Club Student Accounts](#), [Outside School Club Child Accounts](#), or [Outside School Minor Accounts](#)**

Children with [Club Student Accounts](#), [Outside School Club Child Accounts](#), or [Outside School Minor Accounts](#) may post their Club coding projects on the Project Gallery and can also view the Projects of other [Club Student Accounts](#), [Outside School Club Child Accounts](#), or [Outside School Minor Accounts](#) content on the Project Gallery. The Project Gallery for Clubs is visible to anyone with a logged in [GWC Clubs-HQ](#) account, though not the general public.

If any user needs to [report any abuse](#) or inappropriate content on a [School Club](#) or [Outside School Club](#) that has not been addressed by the connected [Teacher Facilitator](#) or [Outside School Club Facilitator](#), they may do so by using the [Report Post Button](#).

- **Third-Party Coding Editor Tools**

To enable [Club Student Users](#) or [Outside School Learner Users](#) to engage in some optional coding activities in the curriculum, including the Project Gallery, a [Teacher Facilitator](#) or [Outside School Club Facilitator](#) (as applicable) may choose to direct a [Club Student User](#) or [Outside School Learner User](#) (as applicable) to sign-up for and use certain third-party coding editor tools ("Third-Party Coding Editor Tools") as set forth here. No user information (including [Personal Information](#)) is shared between these Third-Party Coding Editor Tools and Girls Who Code. The [Club Student User](#) or [Outside School Learner User](#) must separately create an account on such Third-Party Coding Editor Tools. Please see the "Third Party Services" section in our Club Privacy Policy for additional information. [Club Student Users](#) or [Outside School Learner Users](#) may also share a link to their code from the Third-Party Coding Editor in the Girls Who Code Project Gallery.



- **Survey Data**

Girls Who Code may also collect anonymous (not requiring the individual to submit their name or other identifying information) survey data from [Club Student Users](#) that are over 13, as well as [Outside School Minor Users](#) regarding topics such as their satisfaction with Clubs, what topics minors would like to see in the future with Clubs. The surveys will also not allow for free text-form responses.

- **Virtual Event Tool Recordings Girls Who Code Event Session Information**

If a [Club Student User](#) or [Outside School Learner User](#) voluntarily chooses to participate in a Girls Who Code virtual event (using systems such as Zoom, google, etc.) (“Virtual Event Tool Recordings”):

For [School Clubs](#): [Club Student User](#), parent, [Teacher Facilitator](#), and [School Club Administrator](#) information to confirm event attendance (through name and email), how long those attending stayed in the Virtual Event Tool (collected and reported by the Virtual Event Tool on behalf of GWC), and any transcripts on the Virtual Event Tool (downloaded by GWC).

For [Outside School Clubs](#): [Outside School Learner User](#), parent, [Outside School Club Facilitator](#), and [Community Partner](#) information to confirm event attendance (through name and email), how long those attending stayed in the Virtual Event Tool (collected and reported by the Virtual Event Tool on behalf of GWC), and any transcripts on the Virtual Event Tool (downloaded by GWC).

The attendance data may also be shown to other designated third parties (including [Club School Administrators](#) and/or [Community Partners](#), respectively, who did not attend the event).

Within Virtual Event Tool recordings, we collect (through downloading recordings and/or collecting reports from the Virtual Event Tool on behalf of GWC) certain information through your participation in an event session, such as your image, voice, webinar ID, email, movements, and other audio information as well as chat logs or other information provided during the tutoring session. The virtual event sessions (including transcripts and chat logs) are recorded from the perspective of all present [Users](#) to ensure the safety and quality of the virtual events for the [Club Services](#). These recordings are automatically deleted by the Virtual Event Tool after fourteen (14) days and are reviewed by GWC’s safety and quality teams as needed. To learn more about these rules for Zoom in particular, read the Zoom Retention Policy. Otherwise, please see the [Club Privacy Policy](#).

- **Location Information**

We never request precise geolocation data from [Club Student Users](#), [Outside School Club Child Users](#), or [Outside School Minor Users](#) within their [Club](#). If children upload photos or videos





from their computers directly, we collect what the device sends us. If the device sends us Exchangeable Image File Format (EXIF data) (metadata contained within the image file --e.g. camera model, lighting conditions, and location (if enabled) this can contain location data (and may contain precise location data). We strip all EXIF data, including the location information, from the photo before it is viewed by other [Users](#) (e.g., the person receiving a message).

## ● **Automatically Collected Information**

In addition to the information listed above, we automatically collect some information from any use of our [Club Service](#) as set forth in the "[Information We Collect Automatically](#)" section of our Club Privacy Policy, this includes:

- Device-specific information (such as platform, operating system, device ID and device type)
- [Server log data](#) and product event data (such as the last activity a child started, whether they viewed a certain report) from the child's device, or logging in to their account. These are collected to provide the [Club Service](#), for internal analysis on product usage and quality. We may also use it to track progress in the [Club Service](#), and for sending email notifications to the child or Minor to encourage them to take certain actions in the [Club Service](#).
- [Cookies](#)
- [IP address](#)
- Online status

Basically,

We don't ask for or require children to provide [Personal Information](#) beyond that which is reasonably necessary to use Girls Who Code. Please see [this chart](#) for the detailed categories of information we collect from each user type and how we use the information, as well as the sources from which the information was collected, the business purpose for which the information was collected, and the third parties with whom we disclose [Personal Information](#) for a business purpose.

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## **HOW DOES GIRLS WHO CODE USE THE INFORMATION IT COLLECTS FROM CHILDREN?**

In addition to the uses mentioned above, we use the information we collect from [Club Student Users](#) and [Outside Club Learner Users](#) to provide and improve (as allowed by law) the [Club Service](#) to the child or Minor, for [Educational Records](#), security and safety purposes, as authorized by law, or to



enforce our Terms. Additionally, we use the information we collect from [Club Student Users](#) and [Outside School Learner Users](#) as set forth [here](#). If we discover that we have collected information from a child or Minor in a manner inconsistent with our practices regarding COPPA, we will take appropriate steps to either delete the information or immediately seek the [parent's consent](#) for that collection.

Information collected from [Club Student Users](#) and [Outside School Learner Users](#) (including [Personal Information](#) and information collected automatically) is never used or disclosed for [Third-party advertising](#). [Third-party Advertising](#) is not permitted in areas where [Users](#) are required to log in to GWC, and [Personal Information](#) collected from [Club Student Users](#) and [Outside School Learner Users](#) in [Clubs](#) is never used for [Behaviorally-Targeted Advertising](#) to [Club Student Users](#) or [Outside School Learner Users](#) (by us or third-parties). We may serve [Contextually Targeting Advertising](#) for third-party educational products and [Club Services](#) that we believe may be of interest to you (e.g., our Summer Immersion Program). GWC commits that its collection, use, retention, and sharing of [Personal Information](#) shall be reasonably necessary and proportionate to achieve the purposes for which the [Personal Information](#) was collected or processed and for the purposes disclosed in the [Clubs Privacy Policy](#) and [Information Transparency Chart](#) and that the [Personal Information](#) will not be further processed in a manner incompatible with these purposes.

Basically,

Information collected from [Club Student Users](#) and [Outside School Learner Users](#) is never used or disclosed for [Third-party Advertising](#) or any kind of [Behaviorally-Targeted Advertising](#), and it is never sold or rented to anyone, including marketers or advertisers. Please see [this chart](#) for the detailed categories of information we collect from each user type and how we use the information, as well as the sources from which the information was collected, the business purpose for which the information was collected, and the third parties with whom we share or disclose [Personal Information](#) for a business purpose.

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## DOES GIRLS WHO CODE DISCLOSE ANY INFORMATION IT COLLECTS FROM CHILDREN?

We do not disclose any [Personal Information](#) about children to third parties, except to [service providers](#) necessary to provide the [Club Service](#), authorized school personnel (such as [Teacher Facilitators](#)), as directed by the child's or Minor's school or as directed or approved the child's parents, as required by law, or to protect the security of the [Club Service](#) or other [Users](#). For additional



information on the limited other circumstances in which we disclose children's [Personal Information](#), please see the "[Will Girls Who Code Share any Information it Collects](#)" Section in the [Club Privacy Policy](#).

Basically,

We do not disclose any [Personal Information](#) about children to third parties, except to [service providers](#) necessary to provide the [Club Service](#), as directed or approved by parents or the child's or Minor's school, as required by law, or to protect the security of the [Club Service](#) or other [Users](#).

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## WHAT CHILDREN'S INFORMATION IS VISIBLE TO OTHERS?

No [Club Student Account](#), [Outside School Club Child Account](#), or [Outside School Minor Account](#) profile is made available or visible to the general public through Girls Who Code. For a list of what logged-in children and Minor's information can be viewed by other logged-in Girls Who Code [Users](#), please see our [FAQ](#).

- If your child is in a [School Club](#), their [Personal Information](#) in their [Club Student](#) profile will be visible to themselves, 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 their [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 [GWC Clubs-HQ](#) (but not the general public).
- If your child is in an [Outside School Club](#), their [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, and the [Outside School Club Facilitator](#), the [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 [GWC 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 detail on what information is shared between [Outside School Club Child Accounts](#) and [Club Student Accounts](#).
- If any user needs to [report any abuse](#) or inappropriate content on a [School Club](#) or [Outside School Club](#) that has not been addressed by the connected [Teacher Facilitator](#) or [Outside School Club Facilitator](#), they may do so by using the Report Post Button.

Basically,

[Club Student Users](#) and [Outside School Learner Users](#)’ information is visible to others in their [Club](#), depending on the information. Only the Project Gallery is available to any [GWC Clubs-HQ](#) user, however. No [Club Personal Information](#) of children is available to the general public.

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## HOW LONG DOES GIRLS WHO CODE KEEP CHILDREN’S INFORMATION?

We will not retain a child’s or Minor’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 or Minor’s [Personal Information](#), including if a child’s parent directs us to retain certain 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.

Please note that certain content 1) within a [Club Student Account](#) (uploaded by the [Club Student Account](#), [Teacher Facilitator](#), or parent), such as photos, videos, Projects, or 2) uploaded by a [Teacher Facilitator](#), [School Club Administrator](#), parent, or [Club Student User](#) through the [Club Services](#) 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 international laws). 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](#) or [Outside School Minor Accounts](#) (and not school-based accounts or content), please see our [FAQ](#). Girls Who Code will also delete [inactive Outside School Club Child Accounts](#).

Basically,

We only keep a child's [Personal Information](#) for as long as the account is active unless we are required by law or the child's school (for [Club Student Accounts](#)) to retain it, need it to enforce our policies, or to ensure the security of our community. Additionally, we delete Club Students' Accounts if they're [inactive](#) for more than twelve months. Please note that this does not include certain content uploaded by the [Teacher Facilitator](#), parent, or [Club Student User](#) to the Student's Account (or about the student) that may be considered an "[Education Record](#)" under FERPA or other state student privacy laws as we are required to retain these at the direction of the school. GWC will also delete inactive [Outside School Club Child Accounts](#).

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## PARENTAL CHOICES

### Access, Correction, and Deletion Rights under COPPA

We support access to, correction, and deletion of children's [Personal Information](#) by the child or Minor or their parent or legal guardian, either by 1) in [School Clubs](#), assisting the school in meeting its requirements for access, correction, and deletion or by responding to requests we receive from schools, or 2) in [Outside School Clubs](#), directly responding to requests from parents or legal guardians when the information is collected from an [Outside School Club Child User](#), and Girls Who Code obtains the [parent's consent](#) directly (not school [acting as the agent](#) of the parent and consenting) - such as when they are using Girls Who Code not connected to a school.

In addition to the choices provided to you as a parent under COPPA set forth below, you may also have certain other rights relating to your [Personal Information](#), subject to local data protection laws and the jurisdiction you reside in. See the "[What are GWC's Commitments to Providing Transparency and Your Rights?](#)" section in our [Club Privacy Policy](#) for more information on your rights.

1. [Outside School Club Child Account](#) or [Outside School Minor Account](#): If your child's [Outside School Club Child Account](#) or [Outside School Minor Account](#) was set up directly by your child, or you as their parent or legal guardian (either method only after we gather [parental consent](#)), or you allow them access to the [Club Service](#), and you have a parent account connected to your child, you may access, review, correct, or delete any of your child's [Personal Information](#) in the [Club Service](#) by emailing [privacy@girlswhocode.com](mailto:privacy@girlswhocode.com) or [remove@girlswhocode.com](mailto:remove@girlswhocode.com) with the same email used to create your parent account. In addition, if your Minor's [Outside School](#)



[Minor Account](#) was set up by your Minor, you (as their parent) or the Minor may you may access, review, correct, or delete any of your Minor's [Personal Information](#) in the [Club Service](#) by emailing [privacy@girlswhocode.com](mailto:privacy@girlswhocode.com) with the same email used to create either the Minor account (if you are a Minor) or your parent account if you are a parent.

When you delete your child's account (or your Minor or you delete the Minor's account), we delete the content or [Personal Information](#) uploaded as set forth in our [FAQ](#). Please note, however, that any content uploaded (e.g., photos, videos, Projects), that is requested as part of a [Club Student Account](#) (that might be linked to your child's [Outside School Club Child Account](#) or [Outside School Minor Account](#)) or class at a school, or otherwise directed by your child's [Teacher Facilitator](#) or school, is retained at the direction of the school (e.g., for legal compliance reasons such as maintenance of "[Education Records](#)" under FERPA or "[Student Data](#)" under various state student privacy laws or equivalent international jurisdictions). To correct or delete this content, please contact the appropriate official at your child's school. If the school determines that the request should be implemented, the school may either make the change themselves or submit the request to Girls Who Code by emailing [privacy@girlswhocode.com](mailto:privacy@girlswhocode.com).

2. [Club Student Accounts](#): If your child's school set up their [Club Student Account](#) directly and provided consent by acting as an agent and consenting on your behalf, please contact the appropriate official at your child's school to access, review, correct, or delete any of your child's or Minor's [Personal Information](#) in the [Club Service](#). If the school determines that the request should be implemented, the school may either make the change themselves or submit the request to Girls Who Code by emailing [privacy@girlswhocode.com](mailto:privacy@girlswhocode.com).

For either method described above, we will use commercially reasonable efforts to process such requests in a timely manner consistent with applicable law. We will need to verify your identity, for example by requiring that you provide acceptable forms of personal identification.

## Stop Collecting Further [Personal Information](#)

Additionally, at any time, for [Outside School Learner Users](#) you can refuse to permit us to collect further [Personal Information](#) from your child by emailing [privacy@girlswhocode.com](mailto:privacy@girlswhocode.com) from the same email used to create your parent account. Please keep in mind that deleting records may require us to terminate the account in question.

Basically,

We support parents' access to, correction, and deletion of their child's [Personal Information](#). We do this by either working with schools or by directly responding to requests from parents or legal guardians for [Outside School Club Child Users](#) whom we have direct [parental consent](#) for (e.g. for use of Girls Who Code outside of the school). Just email us at [privacy@girlswhocode.com](mailto:privacy@girlswhocode.com) from



the same email used to create your parent account, and we'll be happy to help. Please note, however, that some content may need to be retained at the direction of the school for legal compliance reasons. In these cases, contact your child's or Minor's school to send us the request, and we will happily process the request. In addition to the choices provided to you as a parent under COPPA set forth below, you may also have certain other rights relating to your [Personal Information](#), subject to local data protection laws and the jurisdiction you reside in. See the "[What are GWC's Commitments to Providing Transparency and Your Rights?](#)" section in our [Club Privacy Policy](#) for more information on your rights.

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## HOW DOES GIRLS WHO CODE OBTAIN CONSENT?

Girls Who Code follows the U.S. FTC's COPPA rules for [parental consent](#), including, where applicable, the use of which is commonly referred to as "[school consent](#)" if a school or Facilitator elects to utilize Girls Who Code in the classroom. Girls Who Code will provide all required notices and disclosures for schools to provide to parents when utilizing [school consent](#). More details on how GWC obtains [parental consent](#) and what type of verifiable [parental consent](#) is used can be found [here](#). Although not required under COPPA, we may choose to impose [parental consent](#) requirements on students and the [Outside School Club Child Account](#) or [Outside School Minor Account](#) above at our discretion.

Girls Who Code extends the U.S.-based COPPA consent protections in all jurisdictions, even if not required. If we rely on other legally applicable grounds for processing children's [Personal Information](#) (e.g. if we rely on legitimate interest in the European Union and the United Kingdom), we will still use the FTC COPPA consent methods described to provide further transparency for parents.