Girls Who Code Informational Website Privacy Policy

Last updated: December 18, 2024. You can see past versions of this policy here.

INTRODUCTION AND SCOPE

This Girls who Code website privacy policy (the "Website Privacy Policy") applies solely to the information that Girls Who Code Inc. ("GWC", "we", "our" or "us"), collects in connection from non-logged in users and visitors of the informational websites operated and controlled by GWC that link to this Website Privacy Policy, including www.girlswhocode.com ("GWC Website"), any additional micro-sites or sub-domains associated with GWC ("GWC Microsites"), and any other services that we may offer in connections with our Website and Microsites, such as listservs, contests, panels, and member programs (collectively, including the GWC Microsites and GWC Website, the "Sites").

This Website Privacy policy does not does not apply to any products or services we have or the operation of our services in the logged-in areas of our website which are covered by separate service specific Privacy Policies, including the Girls Who Code Clubs Services that we offer at https://clubs-hq.girlswhocode.com in connection with community center or school use (the "GWC Clubs HQ")("Clubs Services") or our GWC-Led Services that we offer at https://hq.girlswhocode.com in connection with our non-school programming (e.g. Summer, SIP, College Loops, etc.) (" GWC-Led Services") (collectively, "GWC Services"). If you are a student or teacher in a primary or secondary school, please navigate to our Girls Who Code Clubs Services page for more details on the Clubs Services Privacy Policy as well as the GWC GWC-Led Services Privacy Policy (collectively the "Products Privacy Policies").

This Website Privacy Policy explains:

- What information GWC collects from you (and why we collect it).
- How we use and share that information.
- The choices and rights you have, including how to access,update and delete your information.

We will only collect, use, and share your Personal Information in accordance with this Website Privacy Policy. Our Website Privacy Policy is designed to provide transparency into our privacy practices and principles. We've tried to keep it as simple as possible, but if you're not familiar with terms like cookies, IP addresses, pixel tags and browsers, then read about these key terms first.

This Website Privacy Policy also does not apply to information collected through other websites, products, or services that GWC doesn't own or control, such as Third Party services you might access through links or other features (e.g., social media buttons or YouTube videos) on the Sites. These other services have their own privacy policies, and we encourage you to review them before providing them with personal information.

ACKNOWLEDGMENT AND CONSENT

By visiting, accessing, or using this Site, you acknowledge that you accept and agree to this Website Privacy Policy. By visiting the Sites in any manner, you acknowledge that you accept the terms, practices and policies described in this Website Privacy Policy (and as updated from time to time), and you hereby agree that we may collect, use, and share your information as described herein. If you do not agree with our policies and practices, you should not use our Sites. Your use of our Site is at all times subject to our Terms of Use (as updated from time to time (the "GWC Website Terms"), which incorporates this Privacy Policy. Any capitalized terms we use in this Privacy Policy without defining them have the definitions given to them in the GWC Website Terms.

WHAT INFORMATION DOES GWC COLLECT?

On our corporate informational Site, we collect two types of information about you: (1) information that you may choose to voluntarily provide us while using the Site (described below under "Information You Provide to Us" and (2) information collected automatically as a result of your use of the Site (described below under "Information We Collect Automatically"). We may also receive information about you from Third Party sources as described below under "Information We May Receive from Third Party Sources"). We have also created this chart with the detailed categories of personal information we collect from non-logged in users (referred to as "Website Visitors" in the chart), including 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.

Children Under 13

The Sites are not directed toward individuals under the age of thirteen (13) ("Children"), and we request that such individuals do not provide Personal Information. Additionally, we do not knowingly collect (or knowingly allow any third party to collect) or maintain

Personal Information from anyone under the age of 13. If we become aware that a child under 13 has provided us with Personal Information or that Personal Information has been collected from a child under 13, then we will delete this information from our files as quickly as possible. If you are the parent or legal guardian of a child under 13 who you believe has provided personal information to GWC, please send an email to GWC at privacy@girlswhocode.com or contact us as set forth in the "Contacting GWC" section below to have that child's information deleted.

Information You Provide to Us

You may choose to voluntarily provide certain Personal Information to use the Sites. However, in order to use certain features of the Sites (for example, to sign up to receive certain information regarding our programs and services), we may require that you provide the following Personal Information:

- **Contact Information or Communications:** You may choose to provide us with your Personal Information, such as your name, mailing address, email address, and telephone number, when asking a general question, communicating with customer support services, signing up for a GWC listserv, or otherwise interacting with GWC and our third party service providers. We collect records and copies of your correspondence (including email address and messages) when contacting us for support. When you send us a message using the "Contact Us" page or via email, we collect and retain the content of the message, your email address, phone number and any information you provide to us (such as your experience with our service, your contact preferences, and the response we send back to you. This helps us manage any follow-up questions you may have, measures how effectively we address your concerns and improve the Sites.

  When you send us a message using the "Contact Us" page or via email, any emails and phone numbers collected are not further used to market to the individual beyond providing the services requested or responding to the requests.

- **User-Generated Content:**
  We may collect content created by Website Visitors who choose to engage with public content spaces, including message boards, project galleries, activity spaces where pictures, images, and videos may be shared, or in email.

- **Virtual Events:**
  We collect information from Users and GWC Personnel regarding virtual events (using systems such as Zoom, google, etc., each a "Virtual Event Tool"). This information includes event attendance (through name and email) and how long those attending stayed in the Virtual Event Tool (collected and reported by the Virtual Event Tool on behalf of GWC) The attendance data may also be shown to

other designated third parties (either in the aggregate or with additional GWC-Led Services User consent) (e.g. Community Partners). Within Virtual Event Tool recordings, we collect (through downloading recordings and/or collecting reports form 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 GWC-Led Service Users to ensure the safety and quality of the virtual events for the GWC-Led Services. These recordings are automatically deleted by the Virtual Event Tool depending on the Virtual Event Tool's policy, but on average between thirty and fifty five (30-55) days and are reviewed by GWC's safety and quality teams as needed. Separately, within the 30-55-day period in which Virtual Event Tools retain these recordings, GWC may either download, store and retain the recordings (or elect to have the Virtual Event Tools retain these) for up to an additional 30 days to provide and maintain the service, conduct internal analysis, and keep our platform safe and secure. Additionally, for some recordings, GWC will keep a recording for the use of educational purposes. To learn more about these rules for Zoom in particular, read the Zoom Retention Policy. To learn about these rules for googlemeets, in particular, read the Googlemeets Retention Policy. Otherwise, please see the GWC FAQ on retention.

- **Online Surveys and Feedback:** We like feedback, which means we may conduct online surveys to solicit your opinions and comments. Participation in these surveys is of course optional. If you choose to participate, the information you provide will be aggregated with information from other users to make improvements to the user experience and develop appealing content, features, and promotions. Unless otherwise noted in a survey, your participation will remain anonymous.

  You can also ask us questions and share comments or suggestions with us. Your questions, comments, and suggestions may not be kept confidential. We may use your questions, comments, and suggestions to improve the Site and our service, but we will have no obligation to compensate you for any such contributions.

- **Employment Application or Resume:** You may have interest in applying to a full time, part time, contractual, or volunteer position with GWC through one of our Third Party Service Providers. We will have access to the information you provide to these third parties in order to contact you where appropriate.
- **Nomination Forms:** IF YOU SUBMIT ANY PERSONALLY IDENTIFIABLE INFORMATION RELATING TO A THIRD PARTY TO US OR OUR THIRD-PARTY SERVICE PROVIDERS IN CONNECTION WITH THE SITES, YOU REPRESENT THAT YOU HAVE THE AUTHORITY TO DO SO AND PERMIT US TO USE AND DISCLOSE SUCH INFORMATION IN ACCORDANCE WITH THIS WEBSITE'S PRIVACY POLICY.

This information collected is necessary for the adequate performance of the contract between you and us, for our legitimate interest in being able to provide and improve the Site, and to allow us to comply with our legal obligations. Without it, we may not be able to provide you with all the requested services. GWC acts as a controller when processing this information as that term is defined under various applicable data privacy laws.

Our use of the information described above is described below in the section "How Does GWC Use the Information it Collects?"

Detailed Personal Information collected by GWC

We have also prepared this chart which describes in detail the Personal Information we may collect from anyone using the Sites (each, a "Website Visitor"), including 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.

Information We Collect Automatically

When you use the Sites, we (or our service providers) may use various technologies that automatically record or collect certain information, including Personal Information, from your browser or your device about your use of the Sites, if you've read our emails, or you otherwise engage on the Site. This information is necessary for us to enable us to comply with legal obligations and given our legitimate interest in being able to provide and improve the Sites. For example, this could include the frequency and duration of your visits to GWC Site (similar to TV ratings that indicate how many people watched a particular show). If you visit the Sites on different devices, we may link the information we collect from those different devices to help us provide a consistent experience on the Sites across your different devices or to provide GWC relevant advertisements. If we combine any automatically- collected information with Personal Information, we will treat the combined information as Personal Information, and it will be protected as per this Website Privacy Policy.

The technologies and information we automatically collect include:

- **Cookies and other similar technologies:** We (or our Third Party Service Providers) may use cookies or similar technologies to identify your browser or device. We (or our Third Party Service Providers) may also use these technologies to analyze trends, gather demographic information about our user base, track your movements around the Site, administer the Site, tailor the Site for you, and to help the Site work better for you - for example, by remembering your language preferences. We (or our service providers) may also use these technologies (never in student or child logged in areas of the GWC Services) in

connection with advertising of our GWC Services that may appear on other sites or in connection with advertising their products outside of the GWC Service (e.g., if you view an embedded YouTube video player on our Sites, YouTube may place cookies or similar technologies on your browser when you play the video off our site). For more information see the "Online Analytics, Advertising and Do-Not-Track" section below. Additionally, please read our Online Tracking Technologies Policy for more details, including how to modify your cookie settings and a list of the tracking technologies we use.

- **Analytics:** Third Party services, such as Google Analytics, may be used in connection with the Sites. Such services use cookies and similar technologies to analyze how visitors use the Sites, to compile statistical reports on activity related to the Sites, and to provide other services related to the Sites. Such services may also collect information about Visitors' use of other websites or other online resources.

- **Using pixel tags and other similar technologies:** Pixel tags (also known as web beacons and clear GIFs) and other similar technologies may be used in connection with some pages and areas of the Sites and HTML-formatted email messages to, among other things, track the actions of Sites users and e-mail recipients, measure the success of marketing campaigns and compile statistics about usage and response rates of the Sites.

- **Local storage**: We may also use, collect, and store information and preferences locally on your device using mechanisms such as browser-based web storage (including HTTP cookies and HTML5) and application data caches ("Local Storage").

  Like many services, GWC (or our Third Party Service Providers) uses both local storage and cookies and other similar technologies to analyze trends, gather demographic information about our users, understand your engagement with the Sites, administer the Sites, tailor the Sites for you, and to help the Sites work better for you –for example, by remembering your language preferences or other information so that you will not have to re-enter it during the next time you visit the Sites. Please read our Online Tracking Technologies Policy for more details.

- **Device information:** We collect device-specific information such as your device type, device brand, operating system, hardware version and settings, device settings, file and software names and types, battery and signal strength, and device identifiers (including unique device IDs). We may also collect device event information such as crashes, system activity, browser type, browser language, the date and time of your request and referral URL. This helps us measure how the Sites are performing, and improve the Sites for you on your particular device.

- **Server log information:** Like most online services, when you use our Sites we (or our Third Party Service Providers) automatically collect and store certain information in our or their server logs. Examples include things like:

    - IP address
    - Details of how you used our Sites, such as your activity (including product event data used to track progress or user activity), and the frequency and duration of your visits to the Sites (similar to TV ratings that indicate how many people watched a particular show).
    - Telephone log information like your phone number and SMS routing information
    - Data logs or activity needed for measuring up/down time and debugging tools

    This information helps us make decisions about what we should work on next -– for example, by showing which features on our Sites are most (or least!) popular. We may use your IP Address and share it with third parties to help diagnose problems with our servers, for security purposes, to manage the Service, to enhance the Sites based on usage pattern data, for analytics and for advertising. We automatically delete IP Addresses tracked in server logs after six months.

- **Location information:** When you use our Sites, we may collect and process information about your geographic location, for example, based on your IP address. We collect both coarse (i.e., city-level) location data and precise location data. If we request precise geolocation information ("precise" meaning sufficient to identify street name and name of city or town) from you (such as when you are searching for a geographically local GWC activity)), we ask for your explicit opt-in permission. From all Visitors, if they upload photos or videos from their computer 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).

    We will not store or track your precise device location on an ongoing basis or without your permission. We do not share precise geolocation data with third-parties, other than our Third Party Service Providers as necessary to support the Sites. If you no longer wish to allow us to track your precise location information, you may opt-out at any time by turning it off at the device level.

- **Cross-device collection:** To provide users with a seamless online experience, we may link your identifiers on different browsers and environments you are using. We may also work with Third Party partners to employ technologies, including the

application of statistical modeling tools, which permit us to recognize and contact you across multiple devices.

- **Site Usage:** As users interact with the Sites, we collect product events about how the Sites are being used (e.g., which pages are viewed, which features are used, which buttons are clicked, load time, etc.). These are collected to provide the Sites, including for internal analysis on product usage and quality. We may also use it to track progress in the Sites, and for sending push or email notifications to Visitor's device to encourage them to take certain actions on the SItes. Our product event logs may also include unique device IDs and IP addresses. We automatically delete IP Addresses tracked in product logs after six months.

Information We May Receive From Third Party Sources

We may also obtain information, including Personal Information, from Third Party Service Providers to update or supplement the information you provided or we collected automatically. This may include aggregated anonymous information or certain Personal Information that may be provided to us (e.g. questionnaire information or information about your location to offer opportunities in geographic areas near you). If we receive Personal Information from third-parties, we will handle it in accordance with this Website Privacy Policy. If we directly combine information we receive from other third-parties with Personal Information that we collect through the Sites, we will treat the combined information as Personal Information and handle it in accordance with this Website Privacy Policy. Additionally, we may use any aggregated anonymous information received by third-parties as set forth below under the heading "Aggregated Information and Non-Identifying Information". Local law may require you to authorize the Third Party to share your information with us before we can acquire it. We do not control, supervise, or respond to how third parties providing your information process your Personal Information, and any information request regarding the disclosure of your Personal Information to us should be directed to such third-parties. Please see this chart with the details on the Personal Information we collect from Website Visitors, including 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.

HOW DOES GWC USE THE INFORMATION IT COLLECTS?

First and foremost, you should know that GWC does not sell or rent any of you, or your child's Personal Information to any Third Party for any purpose – including for advertising or marketing purposes. Third Party advertising is not permitted on areas where users are required to log in to the GWC Services and Personal Information collected from students and Outside School Child Users is never used for behaviorally-targeted advertising to students or children (by us or third-parties). We may serve Contextually Relevant Advertising for any Website Visitors (not using your

Personal Information) for either our own products (e.g. GWC Challenges) or relevant Third Party products and services that we believe may be of interest to you (e.g., Partner Contests). 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 this Privacy Policy and Information Transparency Chart and that the Personal Information will not be further processed in a manner incompatible with these purposes.

We use your Personal Information only when we have a valid legal basis to do so. We use information, including Personal Information, collected through our Sites for the purposes described in this Website Privacy Policy. In addition, we use the the information collected from Website Visitors for the following purposes:

- ***Power Our Sites and Internal Business Purposes:*** This includes, operating, providing, enhancing and improving the Sites, for example, by developing new features and functionality, and personalizing or customizing the Sites, content and experiences for you.
- ***Provide Internal Analytics and Reviews:*** This includes using for internal audits and review, for analyzing how the Sites are used, providing statistics about the usage levels of the Sites, and diagnosing service or technical problems.
- ***Fulfillment of Requests*****:** To fulfill your requests and provide any information you request, such as responding to your emails, submissions, questions, comments, requests for information or customer support or for event registration, scheduling, or attendance; for any other purpose for which the information was collected (event donations), or for which you provide your consent (if required).
- ***Process your employment application***
- ***Communicate with You*****:** To send you information about features on our Sites, changes to our policies on the Sites, or to communicate with you about your use of the Sites. We may also send you security alerts, and support and administrative messages and otherwise facilitate your use of, and our administration and operation of the Sites (including notifying you of data privacy incidents). Additionally, we may provide Visitors information about events, announcements, offers, promotions, products, including Third Party products, and other GWC services or products we think will be of interest to you.

- ***Advertising:*** Create, tailor, deliver, and study the effectiveness of advertising and promotional material both on and off the Sites, as well as for analytics on this (including as described in the Online Analytics, Advertising and Do-Not-Track section below).

- ***Offer Promotions*:** Operating sweepstakes, contests and similar promotions (collectively, "Promotions") through the Sites. We typically ask you for certain Personal Information when you enter or win a Promotion. You should carefully review the rules, if any, of each Promotion in which you participate through the Sites, as they may contain additional important information about GWC's use of Personal Information about you. To the extent that such rules concerning the treatment of Personal Information about you conflict with this Sites Privacy Policy, such rules shall control. Additionally, we may communicate with you in order to notify and contact contest and sweepstakes entrants.

- ***Request Your Participation in Surveys or Focus Groups*:** To request your participation in ratings, reviews, surveys, focus groups, or other initiatives which help us to gather information used to develop and enhance our products and the Sites.

- ***Security and Fraud Prevention*:** Most crucially, to protect our community by making sure the Sites remain safe and secure, such as by detecting, investigating and preventing activities that may violate our policies or be illegal.

- ***Law Enforcement; Emergencies; Compliance*:** Notwithstanding any other provision of this Websites Privacy Policy to the contrary, we and our Third Party Service Providers may use Personal Information as we and our Third Party service providers believe to be necessary or appropriate: (a) under applicable law; (b) to comply with legal process; (c) to respond to requests from public or government authorities; (d) to enforce agreements that we have with you or other users; (e) to protect our operations; (f) to protect our rights, privacy, safety or property, or that of the GWC community, our service providers, you or others; (g) at our discretion under emergency circumstances; or (h) to allow us to pursue available remedies or limit the damages that we may sustain.

When acting as a Controller, we process this information given our legitimate interest in improving and protecting the Sites and our Website Visitors' experience with them, taking into consideration your interests, rights, and expectations. Depending on the circumstances, we may also rely on your consent or the fact that processing is necessary for the adequate performance of the contract with you, to protect your vital interests or those of other persons of the Sites, and to comply with applicable laws. Additionally, when acting as a Controller, we will process your Personal Information for the purposes listed in this section related to marketing given our legitimate interests in undertaking marketing activities to offer you products and Sites that may be of interest to you. You can opt-out of receiving marketing communications from us by following the unsubscribe instructions included in our marketing communications.

Please note that we may anonymize and/or De-identify information collected through the Sites or via other means so that the information no longer relates to you. Subject to applicable laws, where we have anonymized and/or De-identified information so that it

no longer identifies you personally, our use and disclosure of such information is not subject to this Websites Privacy Policy.

Automated Decision Making
We use automatically collected information (described in the "Information We Collect Automatically" section above) to provide and support our Sites, and for the additional uses described in this section of this Website Privacy Policy. To learn more about how we use your information for personalization and tracking, including advertising, please see our Online Tracking Technologies Policy. We do not use algorithms for profiling or to otherwise make any decision based solely on automated processing that would significantly affect you without the opportunity for human review ("Automated Decision Making").

WILL GWC SHARE ANY INFORMATION IT COLLECTS?

GWC does not Sell or rent your Personal Information collected from the Sites to any Third Party for any purpose - including for advertising or marketing purposes. We may disclose Personal Information with third-parties for the purpose of enabling these third parties to provide supports in the limited circumstances described in this Websites Privacy Policy and as set forth below:

- **Third Party Integrations on our Club Service:** When you as a Website Visitor use Third Party apps, websites, social media or other services that use, or are integrated with, our Sites, they may receive information about what you post or share. Please see here for more information on Third Party services. Please see here for a list of Third Party app integrations on our Sites.

- **Business Partners:** From time to time, GWC may partner with other companies to jointly offer products or services. If you purchase or specifically express interest in a jointly-offered product or service from GWC, we may share information collected in connection with your purchase or expression of interest with our joint promotion partner(s). GWC does not control our business partners' use of the information we collect, and their use of the information will be in accordance with their own privacy policies. If you do not wish for your information to be shared in this manner, you may opt not to purchase or specifically express interest in a jointly offered product or service. GWC does not share information with business partners unless you specifically opt-in to such sharing. If you do not wish for your information to be shared in this manner, you may choose not to opt-in. If you choose to share your information with business partners in the manners described above, your information will be subject to the business partners' respective privacy statements.

- **Service providers:** We do work with vendors, Third Party Service Providers, and other partners (which may or may not be located inside or outside of the European Economic Area ("EEA")) to help us manage the Sites by performing tasks on our behalf. We may need to share or provide information (including Personal Information) to them to help them perform these business functions, for example sending emails on our behalf, database management services, database hosting, providing customer support software, and security. We may also authorize these Third Party companies to collect information on our behalf. These providers have limited access to your Personal Information to perform these tasks on our behalf and are contractually bound to protect and use it only for the purpose for which it was disclosed. Additionally, these partners and service providers must adhere to confidentiality and security obligations in a way that is consistent with this Website's Privacy Policy. Please see here for a list of the third-parties we work with to provide support for the Sites.

- **Information Posted by You.** GWC may make available through the Sites certain services (for example, message boards, events, forums and blogs, or public galleries, among other services) to which you are able to post information and materials publicly. Please note that any information you disclose through such services becomes public information, and, may be available to visitors to the Sites and to the general public. In addition, when you choose to post on such services, certain Public Information (for example, any name that you disclose in connection with such a post), will be available for other users to view. We urge you to exercise discretion and caution when deciding to disclose Personal Information, or any other information, through such services on the Sites. We are not responsible for the use of any Personal Information you voluntarily disclose publicly through the Sites.

- **Social Media Platforms:** Where permissible according to applicable law, we may share certain limited Personal Information with social media platforms (such as Google or Facebook) and other websites, applications or partners, to generate leads, drive traffic to our websites or otherwise market and advertise our products or GWC-Led Services on those websites or applications (this will never include Personal Information of minors). We may also share certain Personal Information with social media platforms and other websites to ensure that these individuals are not marketed to on these platforms. These processing activities, when we are acting as a Controller are based on our legitimate interest in undertaking marketing activities to offer you products and services that may be of your interest. These social media platforms with which we may share your Personal Information are not controlled or supervised by GWC. Therefore, any questions regarding how your social media platform processes your Personal Information should be directed to such a provider. You may also choose to contact us here if you would like to opt-out of any such sharing.

- **Analytics Services:** To help us better understand your use of the Sites, we may use Third Party analytics services, such as Google Analytics. You can find out more about Google's position on privacy as it regards its analytics services at www.google.com/policies/privacy/partners/. These third-parties use the type of technologies described in the "Automatically Collected Information" section above. These services may collect, store and use information in order to help us understand things like how often you use the Sites , the events that occur within the Sites, usage, and performance data. A current list of analytics providers that we use is located here.

- **Aggregated Information and Non-Identifying Information:** As allowed by applicable laws, we may share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and other De-identified or non-personally identifiable information (such as statistics about visitors, traffic and usage patterns) with third parties, including with users, partners or the press in order to, for example, demonstrate how the Sites are used, spot industry trends, or to provide marketing materials for GWC. Any aggregated information and non-personalized information shared this way will not contain any Personal Information.

- **Legal Requirements:** We may disclose information, including Personal Information, if we have a good faith belief that doing so is necessary to comply with the law, such as complying with a subpoena or other legal process. We may need to disclose Personal Information where, in good faith, we think it is necessary to protect the rights, property, or safety of GWC, our employees, our community, or others, or to prevent violations of our Terms of Service or other agreements. This includes, without limitation, responding to law enforcement and government requests and defending ourselves against Third Party claims and allegations. Where appropriate, we may notify users about the legal requests, unless (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law; (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon GWC, its users or the Direct Service. In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that user about the request after the fact where appropriate and where we determine in good faith that we are no longer prevented from doing so.

- **Fraud and Security Protection:** We may share information to assist with security operations for scheduled penetration testing, auditing, and continuous improvement of our security practices, including without limitation, exchanging

information with other companies and organizations for fraud protection. Authorized parties of the information would comply with our current privacy and security policies.

- **Sharing with GWC Companies:** Over time, GWC may grow and reorganize. We may share your Personal Information with affiliates such as a parent company, subsidiaries, joint venture partners, or other companies that we control or that are under common control with us, in which case we will require those companies to agree to use your Personal Information in a way that is consistent with this Website Privacy Policy.

- **Change of control:** This Website Privacy Policy will continue to apply to your information in the event of a chance of control, and any acquirer would only be able to handle your Personal Information as per this policy (unless you give consent to a new policy). We will provide you with notice of an acquisition within thirty (30) days following the completion of such a transaction, by posting on our homepage, or by email to your email address that you provided to us. If you do not consent to the use of your Personal Information by such a successor company, subject to applicable law, you may request its deletion from the company. We may also make information, including Personal Information, available to a potential investor or purchaser (or their advisors) in advance of any such transaction completion.

  In the unlikely event that GWC goes out of business, or files for bankruptcy, we will protect your Personal Information, and will not sell it to any Third Party.

- **With your consent:** Other than the cases above, we won't disclose your Personal Information for any purpose unless you consent to it.

ONLINE ANALYTICS, ADVERTISING AND DO-NOT-TRACK

As a reminder, this Website Privacy Policy applies to the Sites, not the GWC-Led Services or GWC Clubs Services.

Online Analytics Providers

We may collect analytics data, or use Third Party analytics tools such as Google Analytics, to help us measure website traffic and usage trends for the Sites and to understand more about the demographics of our users. You can learn more about Google's practices here, and view its currently available opt-out options. These third-parties use technologies described in the "Automatically Collected Information"

section above. The information collected by this technology will be disclosed to or collected directly by these service providers. A current list of analytics providers that we use is located here.

Advertising Technology Providers

Data about your activities on our Sites may be collected by us or by advertising technology providers for use in delivering online advertising tailored to your individual characteristics, activities, interests and other factors. These ad services may track your online activities over time and across the web by collecting information through automated means, including through the use of the various technologies described above, and they may use this information, and other information they receive from us or other sources, to deliver advertisements to you on our Sites, our emails, and other websites. We and Third Party vendors may use first-party cookies and Third Party cookies together, and other automated technologies, and in some cases additional information, (i) to inform, optimize, and serve ads based on past visits to our Sites or other factors and (ii) to report how ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to our Sites or other factors.

You may visit the Network Advertising Initiative's Consumer Opt-Out page or the Digital Advertising Alliance's Consumer Opt-Out page to opt-out of receiving tailored advertising based on your Internet browsing activities from companies that participate in those programs. Some of our advertising-related activities may involve the services of companies that do not participate in those programs. For example, we may use the Google AdWords remarketing service to advertise on Third Party websites (including Google) to previous visitors to our Sites. You can set preferences for how Google advertises to you using the Google Ad Preferences page. The opt-outs apply only to the browser in which you set them. For example, if you set the opt-out while using Firefox, but then use Chrome, the opt-out will not be active in Chrome. To opt-out in Chrome, you will need to repeat the opt-out process.

The opt-outs described in this Website Privacy Policy do not block or delete cookies, or prevent the use of cookies or other technologies for purposes other than selecting ads based on your interests as inferred by your online behavior. If you opt-out, data may still be collected about your web browsing activities and you will still see advertising. Ads may be delivered based on other factors, such as the content of the web page in which they are shown, or demographic information obtained through other means.

Please read our Online Tracking Technologies Policy for more details, including how to remove or modify your cookie settings and a list of the advertising tracking technologies we use.

Do Not Track Disclosure

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers to inform websites and services that they do not want certain information to be "tracked" For more information on "do not track," please visit www.allaboutdnt.org. The industry working group (W3C Tracking Protection) to develop the DNT standard is now closed, so ClassDojo does not respond to these DNT signals. There are different (from DNT) opt-out preference signals set forth under the CCPA or other state privacy laws ("Opt-Out Preference Signals") also called a Global Privacy Control (GPC) Signal. GWC will respond to Opt-out Preference or Global Privacy Control Signals. This signal will apply to the browser. A consumer can use an Opt-Out Preference Signal by following the instructions here.

HOW DOES GWC PROTECT AND SECURE MY INFORMATION?

The security of your Personal Information is important to us. The safety and security of your Personal Information also depends on you and you should maintain good internet security practices. We work hard to protect our community, and we maintain reasonable administrative, technical, and physical security procedures and practices appropriate to the nature of the Personal Information designed to protect Personal Information from unauthorized or illegal use, destruction, disclosure, or access. In particular:

- Our engineering team is dedicated to keeping your Personal Information secure
- We perform application security testing; penetration testing; conduct risk assessments; and monitor compliance with security policies
- We periodically review our information collection, storage, and processing practices, including physical security measures, to guard against unauthorized access to systems
- Whenever we develop new features, we do in a manner to keep your Personal Information safe
- When you enter any information anywhere on the GWC-Led Services, we encrypt the transmission of that information using secure socket layer technology (SSL/TLS) by default
- GWC's databases where we store your Personal Information are encrypted at rest. This converts your Personal Information into a form that unauthorized users can't translate.

- The GWC-Led Services are hosted on servers at a Third Party facility, with whom we have a contract providing for enhanced security measures. For example, Personal Information is stored on a server equipped with industry-standard firewalls. In addition, the hosting facility provides a 24x7 security system, video surveillance, intrusion detection systems, and locked cage areas.
- We operate a "bug bounty" security program to encourage an active community of Third Party security researchers to report bugs to use. More information on this is available by contacting us at security@girlswhocode.com .
- We restrict access to Personal Information to authorized GWC employees, agents or independent contractors who need to know that information in order to process it for us, and who are subject to strict confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

For additional information on our security practices, please see our Security Whitepaper.

Although we make concerted good faith efforts to maintain the security of Personal Information, and we work hard to ensure the integrity and security of our systems, no practices are 100% immune, and we can't guarantee the security of information. Outages, attacks, human error, system failure, unauthorized use, or other factors may compromise the security of user information at any time. If we learn of a security breach, we will attempt to notify you electronically (subject to any applicable laws and school reporting requirements) so that you can take appropriate protective steps; for example, we may post a notice on our homepage (www.girlswhocode.com) or elsewhere on the Website, and may send email to you at the email address you have provided to us. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

HOW LONG DOES GWC KEEP INFORMATION ABOUT ME?

We retain the data we collect for different periods of time depending on what it is, how we use it, and how you configure your settings (if applicable). We store your Personal Information for the length of time needed to fulfill the purposes outlined in this Website Privacy Policy unless a longer retention period is required or permitted by law. We determine the appropriate retention period for Personal Information on the basis of the amount, nature and sensitivity of the Personal Information being processed, the potential risk of harm from unauthorized use or disclosure of the Personal Information whether we can achieve the purposes of the processing through other means, and on the basis of applicable legal requirements (such as applicable statutes of limitations). You can read more about GWC's data retention periods, including how long it takes us to delete your information here.

Please note that we may have to retain some information after deletion, to comply with legal obligations, to protect the safety and security of our community or the Website, or to prevent abuse of our Terms.

Additional examples of when we may need to retain your Personal Information after deletion:

WHAT ARE GWC'S COMMITMENTS TO PROVIDING TRANSPARENCY AND YOUR RIGHTS?

We try to be transparent about what information we collect so that you can make meaningful choices about how it is used. You control the Personal Information you share with us. You may have certain rights relating to your Personal Information, subject to local data protection laws. Please review local data protection laws for more information. Depending on the applicable local laws these rights may include the rights set forth in this Section. You also have the right not to be discriminated against for exercising any of your rights set forth in this Section.

- Access or correct your Personal Information
- Delete your Personal Information from GWC
- Object, restrict or withdraw consent and processing
- Data Portability at GWC
- Right not to be subject to Automated-Decision making
- Additional information or assistance and Article 27 GDPR local representative

If you are a California resident, you may have additional rights as set forth under the California Consumer Privacy Act, as amended by the California Privacy Rights Act and its implementing regulations (collectively the "CCPA"). Please see the Section "California Privacy Disclosures" Section for more information if you are a California resident. Additionally, if you are a resident of certain other states within the United States, you may have additional rights as set forth in the U.S. State Law Requirements Section below.

How to Exercise Your Rights

You may exercise any of these rights described in this section by sending an email to privacy@girlswhocode.com or making a request here. Please note that we may ask you to verify your identity before taking further action on your request, for example by requiring you to provide acceptable forms of personal identification. Your Personal Information may be processed in responding to these rights. We try to respond to all legitimate requests within one month unless otherwise allowed or required by law, and will contact you if we need additional information from you in order to honor your request or verify your identity. Occasionally it may take us longer than a month, taking into account the complexity and number of requests we receive.

We may reject requests for access, change, or deletion that are unreasonably repetitive (more than two times per year for access rights), risk the privacy of others, require disproportionate technical effort (for example, developing a new system or

fundamentally changing an existing practice), or would be extremely impractical (for instance, requests concerning information residing on backup systems). Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort or if more than two times a year for access rights.

Access or Correct Your Personal Information

GWC aims to provide you with easy access to any Personal Information we have collected about you and give you easy ways to update it. Upon request, GWC will provide you with any information about whether we hold any of your Personal Information, and if we do, you may request access to all of your Personal Information we have on file by contacting us as set forth above. In some cases, we won't be able to guarantee complete access due to legal restrictions – for example, you will not be allowed to access files that contain information about other users or information that is confidential to us.

You have the right to correct inaccurate or incomplete personal information concerning you. You may, at any time, update or correct certain Personal Information that you have provided to us by contacting us as set forth above. When updating your personal information, we may ask you to verify your identity before we can act on your request. You may also exercise your control or choices with the communications we send you as set forth in "How Can I Contact GWC with Questions" section below.

How Can I Delete My Personal Information?

If for some reason you ever want to delete your Personal Information that we may store in connection with our Sites, you can do that at any time by contacting us as set forth above. When we delete your personal information associated with our Websites, we delete your Personal Information as set forth here. Information that you have shared with others, others have shared about you, or content other users may have copied and stored, is not part of your account and may not be deleted when you delete your account. If you are a California resident, we may also retain personal information as set forth under the CCPA.

We aim to maintain our Websites in a manner that protects information from accidental or malicious destruction. Because of this, even after you update or delete personal information you have provided us from our Websites, your Personal Information may be retained in our backup files and archives for a reasonable period of time as necessary for our legitimate business interests, such as fraud detection and prevention and

enhancing safety. Also, we may retain and use your personal information to the extent necessary to comply with our legal obligations.

Object, Restrict, or Withdraw Consent

Where you have provided your consent to the processing of your Personal Information by GWC you may withdraw your consent at any time by sending a communication to GWC specifying which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal. GWC provides Website Visitors with the opportunity to withdraw consent or 'opt-out' of receiving any future marketing communications from GWC and its partners at any time. Please see "What communications will I receive from GWC?" section below for more information. Additionally, you can always decline to share Personal Information with us, or even block all cookies. However, it's important to remember that many of GWC's features may not be accessible, or may not function properly - for example, we may not be able to remember your language preferences for you.

In some jurisdictions, applicable law may entitle you to require GWC not to process your Personal Information for certain specific purposes (including profiling) where such processing is based on legitimate interest. If you object to such processing GWC will no longer process your Personal Information for these purposes unless we can demonstrate compelling legitimate grounds for such processing or such processing is required for the establishment, exercise or defense of legal claims. Additionally, in some jurisdictions, applicable law may give you the right to limit the ways in which we use your Personal Information, in particular where (i) you contest the accuracy of your Personal Information; (ii) the processing is unlawful and you oppose the erasure of your Personal Information; (iii) we no longer need your Personal Information for the purposes of the processing, but you require the information for the establishment, exercise or defense of legal claims; or (iv) you have objected to the processing as set forth below and pending the verification whether the legitimate grounds of GWC override your own.

Additional Information or Assistance And Article 27 GDPR Local Representative

If you are located in the European Union, or the EEA or the United Kingdom (UK), you have a right to lodge complaints about the data processing activities carried about by GWC with the supervisory authority in your country.

European Data Protection Officer

General Data Protection Regulation (GDPR) – European Representative

Pursuant to Article 27 of the General Data Protection Regulation (GDPR), GWC has appointed European Data Protection Office (EDPO) as its GDPR Representative in the EU. You can contact EDPO regarding matters pertaining to the GDPR:

- by using EDPO's online request form: https://edpo.com/gdpr-data-request
- by writing to EDPO at Avenue Huart Hamoir 71, 1030 Brussels, Belgium

UK General Data Protection Regulation (GDPR) - UK Representative

Pursuant to Article 27 of the UK GDPR, GWC has appointed EDPO UK Ltd as its UK GDPR representative in the UK. You can contact EDPO UK regarding matters pertaining to the UK GDPR:

- by using EDPO's online request form: https://edpo.com/uk-gdpr-data-request/
- by writing to EDPO UK at 8 Northumberland Avenue, London WC2N 5BY, United Kingdom

WHAT IF I'M NOT LOCATED IN THE UNITED STATES

The Websites are hosted and operated in the United States. If you use the Websites from the European Union or the United Kingdom, or any other region with laws governing data collection, protection and use that may differ from United States law, please note that you may be transferring your Personal Information outside of those jurisdictions to the United States. The Personal Information we or our Third Party Service Providers collect may be stored and processed in servers within or outside of the United States and wherever we and our service providers have facilities around the globe, and certain information may be accessible by persons or companies outside of the United States who provide services for us. Prior to transferring your Personal Information to the United States, GWC will take appropriate steps to ensure that the Personal Information will be safeguarded and used only for authorized purposes set out in this Website Privacy Policy or in accordance with applicable laws.

Additionally, where we transfer, store and process your Personal Information of the United Kingdom, European Union or EEA, we have ensured that appropriate safeguards are in place to ensure an adequate level of protection for the rights of data subjects based on the adequacy of the receiving country's data protection laws, or an alternative mechanism for the transfer of data as approved by the European Commission (Art. 46 GDPR), or other applicable regulator.

By using the Websites, you consent to the transfer of your Personal Information outside your home jurisdiction, including to the United States, and to the storage of your Personal Information in the United States, for the purpose of hosting, using and processing the personal information in accordance with this Website Privacy Policy. You further acknowledge that these countries may not have the same data protection laws

as the country from which you provided your personal information, and that GWC may be subject to access requests and be compelled to disclose your personal information to government authorities, courts and law enforcement officials outside of your home country (including in the United States). You have the right to withdraw your consent at any time by contacting us as described in the "How Can I Contact GWC with Questions" section below. If you have questions regarding our policies and practices with respect to the transfer of your personal information outside of your home country, please contact us as set out below.

SOCIAL MEDIA FEATURES

The Sites may now or in the future include social media features, such as the Facebook Like button or the Twitter Tweet button, or incorporate certain other functions that allow you to interact with the Sites through your accounts on certain supported Third Party social network or network storage sites (collectively "Social Media Features"). These Social Media Features may collect your IP address, which page you are visiting on our Sites, and may set a cookie to enable the feature to function properly. You may be given the option by such Social Media Features to post information about your activities on our Sites to a profile page of yours that is provided by a Third Party social media network in order to share with others within your network. Social Media Features are either hosted by a Third Party or hosted directly on our Sites. Your interactions with these Social Media Features are governed by the privacy policy of the company providing each Social Media Feature. If you are not comfortable accessing such social media websites and using such Social Media Features, please don't use them!

THIRD PARTY SERVICES

Portion so the Sites may contain links to websites, applications, services, or other content provided by third-parties (e.g., video players) ("Third Party Platform Providers"). GWC does not control or monitor any such Third Party Platform Providers, and your use of these Third Party Platform Providers may result in the collection, processing and sharing of information about you, depending on the features. Any information, including Personal Information, you choose to provide or that is collected by these third-parties is subject to that Third Party Platforms policies governing privacy and security and is not covered by this Sites Privacy Policy.

These other websites may place their own cookies or other files on your computer, collect data or solicit Personal Information from you, including if you view a video through an embedded video player which is played off our Sites, but may appear to still be playing on our Sites. The fact that we link to a website or other Third Party content is not an endorsement, authorization or representation that we are affiliated with that Third Party, nor is it an endorsement of their privacy or information security policies or

practices. We are not responsible for the content, features, privacy and security practices and policies of any third-parties. We encourage you to learn about third-parties' privacy and security policies before providing them with Personal Information.

U.S. STATE DATA PRIVACY DISCLOSURE

Overview

If you are a U.S. resident, we process your Personal Information in accordance with applicable U.S. state data privacy laws ("US State Data Protection Laws") which require specific disclosures for state residents. This section of our GWC-Led Services Privacy Policy contains information required by the CCPA and other U.S. State Data Protection Laws.

Please note that recent changes to the CCPA and other U.S. State Data Protection Laws are set to take effect in 2025; however, the rules implementing some of these laws have not yet been finalized. We are continuously working to better comply with these laws, and we will update our processes and disclosures as these implementing rules are finalized.

Transparency

You have the right to know what kinds of Personal Information GWC collects and the sources of that information, how we use that information, and our business purpose for that collection. Please see this chart for the detailed categories of Personal Information we collect from Website Visitors, including the sources from which the information was collected, the business purpose for which the information was collected, the third parties with whom we disclose Personal Information for a business purpose, and information on retention periods for the categories of Personal Information ("Notice at Collection").

Please see the "What Information Does GWC Collect?" and the "How Does GWC Use the Information it Collects?" sections of this Privacy Policy for more information on the Personal Information we collect, the sources of that information and how we use this information. Please also see the "Will GWC Share Any Information It Collects?" and "How Long Does GWC Keep Information About Me?" section of this Website Privacy Policy for more information on when GWC may disclose Personal Information and how GWC retains Personal Information.

Your Rights and Choices

If you are a California resident or resident of any other state with an applicable U.S. State Data Protection Law, you have the right to request that GWC disclose certain information to you about our collection, use, and disclosure of your Personal

Information. Please see this chart for the detailed categories of Personal Information we collect from each user type, including the sources from which the information was collected, the business purpose for which the information was collected, the third parties with whom we disclose Personal Information for a business purpose, and information on retention periods for the categories of Personal Information.

You also have specific rights of access, deletion, correction and data portability regarding your Personal Information under the CCPA and other applicable U.S. State Data Privacy Laws. You have the right to request that GWC provide the specific pieces of information that we have collected about you. We provide these same rights to all users regardless of location. Please see the "GWC's commitments to providing Transparency and Your Rights" Section for more detail on how to exercise these rights, including how we will verify requests. The VCDPA, CPA and other applicable U.S. State Data Protection Laws also provide the right to opt out of certain forms of profiling and targeted advertising. You may also designate a natural person or business entity registered with the California Secretary of State (or your applicable state) to act on your behalf to exercise these rights.

We will not discriminate against you for exercising any of your rights under CCPA or any other applicable U.S. State Data Protection Law with a similar right. Unless permitted by the CCPA or any other applicable U.S. State Data Protection Law, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including granting discounts or other benefits, or imposing penalties.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA, or any other applicable U.S. State Data Protection Law, that can result in different prices, rates, or quality levels. Any CCPA-permitted (or other U.S. State Data Protection Law) financial incentive we offer will be reasonably related to your Personal Information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

WHAT COMMUNICATIONS WILL I RECEIVE FROM GWC?

If you provided an email or phone number to us as part of your engagement with the Sites, or otherwise opted-in to receive communications from us, you consent to us sending you messages and updates regarding GWC, including privacy and security notices, updates regarding the Sites, and information regarding products, features or services from GWC or third-parties we believe you may be interested in. These communications may include, but are not limited to, social media updates, SMS/MMS

messages, push and in-app notifications, email, and postal mail. We may also use your email address to contact you for customer service purposes, or for any legal matters that arise in the course of business. We may receive a confirmation when you open an email from us if your device supports it. We use this confirmation to help us understand which emails are most interesting and helpful.

CHANGES AND UPDATES TO THIS PRIVACY POLICY

We may occasionally update this Website Privacy Policy as our business practices and legal requirements evolve or to further protect our users. You can see when the last update was by looking at the “Last Updated” date at the top of this page and any updates will be effective upon posting. We won’t reduce your rights under this Website Privacy Policy without your explicit consent. If we make any significant changes, we’ll provide prominent notice by posting a notice on the Sites and/or notifying you by email (using the email address you provided), so you can review and make sure you know about them. We encourage you to review this Website Privacy Policy from time to time, to stay informed about our collection, use, and disclosure of Personal Information through the Sites. By continuing to use the Sites after the revised Website Privacy Policy has become effective, you acknowledge that you accept and agree to the current version of the Website Privacy Policy.

We reserve the right to notify you of updates to our Website Privacy Policy as part of communications, e.g., by email, and/or by some other means. Please note that if you have opted not to receive legal notice emails from us (or you have not provided us with your email address), those legal notices will still govern your use of the Sites, and you are still responsible for reading and understanding them.

HOW CAN I CONTACT GWC WITH QUESTIONS?

If you have any questions or concerns about this Website Privacy Policy, our privacy practices, or how we protect our community, please contact us at privacy@girlswhocode.com - we'd love to help. If you’d like, you may also write to us at:

Girls Who Code, Inc.
1250 Broadway, Floor 17
New York, New York
10001
Attention: Associate Counsel