

# Girls Who Code Privacy Policy

Last updated: Sep 8th, 2022

This is the privacy policy (“Privacy Policy”) that governs how we, Girls Who Code Inc. (“GWC”, “we”, “our” or “us”), use Personal Information (defined below) that we collect, receive and store about individuals in connection with the use of the website [www.girlswhocode.com](http://www.girlswhocode.com), and any other website that we operate (each, together with its sub-domains, content and services, a “Site”).

We do not ourselves host any of the services – all hosting is done by third party service providers that we engage. This means that data you provide us or that we collect from you (including any Personal Information, as defined below) – as further described in this Privacy Policy – is hosted with such third party service providers on servers that they own or control. Regardless of where such third party service providers are located, their servers may be located anywhere in the world. So please be aware that you are consenting to your data being transferred to various third party service providers around the world and that your personal information or data may become available to the applicable foreign government or its agencies of any of these countries under a lawful order made in the relevant country. If you would like more information on our practices with respect to the use of foreign service providers, please contact us as set out below. For clarity, if you are a student or teacher using our Site in a primary or secondary school with whom we have entered into a separate agreement that supplements the Terms, such as our Data Privacy Agreement (each, a “DPA”), the terms of those DPAs may also apply. To the extent of any conflict or inconsistency between a DPA and this Privacy Policy, the conflicting terms of the DPA shall prevail.

- 1. Introduction.** We have implemented this Privacy Policy because your privacy, and the privacy of other users, is important to us. This Privacy Policy explains our online information practices and the choices you can make about the way your Personal Information is collected and used in connection with the Site. “Personal Information” means any information that may be used, either alone or in combination with other information, to personally identify an individual, including, but not limited to, a first and last name, a personal profile, an email address, a home or other physical address, or other contact information.
- 2. Terms of Use.** This Privacy Policy forms part of our Terms of Use which is available at <https://hq.girlswhocode.com/terms> (“Terms”). Any capitalized but undefined term in this Privacy Policy shall have the meaning given to it in the Terms.
- 3. Consent and Modification.** You are not legally obligated to provide us Personal Information, and you hereby confirm that providing us Personal Information is at your own free will. By using the Site, you consent to the terms of this Privacy Policy and to our collection, processing and sharing of Personal Information for the purposes set forth herein. If you do not agree to this Privacy Policy, please do not access or otherwise use the Site. We reserve the right, at our discretion, to change this Privacy Policy at any time. Such change will be effective ten (10) days following posting of the revised Privacy Policy on the Site, and your continued use of the Site thereafter means that you accept those changes.
- 4. What Personal Information We Collect and How We Collect It.** We do not currently require you to provide Personal Information in order to have access to general information available on the Site. But, in order to use certain services that we offer via the Site, you may be required to create an account (“Account”). If you create an account, you will be asked to provide us with certain information, such as your first and last name, birthdate and email address as well as a password that you will use for your Account (“Account Information”). If you join a Program, you may also be asked to provide additional Personal Information such as grade-level, or graduation year, and demographic information as part of the enrollment process and in connection with your ongoing use of your Account. We may send you an e-mail to the e-mail address you submit to confirm your registration. If you choose not to create an Account, you may not be able to access or use certain features of the Site.

The table below describes the Personal Information collected by GWC from users of the Site, whether providing it is mandatory or optional, and how it is used:

<b>Information Collected by GWC</b>	<b>When and Where We Collect this Information</b>	<b>Mandatory/Optional</b>	<b>How This Personal Information Is Used by GWC</b>
First Name, Last Name, and Email Address	Upon registration	Mandatory	To create an Account. We may use your email to send you important information regarding the Site, changes of our terms, conditions, and policies and/or other administrative information. Because this information may be important to your use of the Site, if you have provided an email, you may not opt-out of receiving such communications.
Birthdate	Upon registration	Mandatory	For our internal business purposes, including for data analysis and audits. We may use this data, in conjunction with other sources of data (for example, responses to surveys we administer to stakeholders or data obtained from the National Student Clearinghouse) to assess the quality and impact of our programs, and inform you of program which may be of interest to you, and ongoing program planning and improvements.
Affiliations (School, Employment, Community-Based Organizations)	Upon joining a Program	Mandatory	Same as above for "Birthdate".
Demographic Information	Upon joining a Program	Mandatory	Same as above for "Birthdate".
Contact Information (including full name, email address, and physical mailing address)	Upon contacting GWC or submitting a form requesting information	Optional	This information may be collected when users submit an online form that we make available or send an email to us. It is used to contact a user interested in receiving information about our Site in general or our different programs in

	from GWC		particular.
Information Generated from Log Files (including information such as internet protocol (IP) addresses, type of browser, Internet Service Providers (ISP), date/time stamp, referring/exit pages, clicked pages, and any other information your browser may send to us)	Upon usage of Site	Mandatory	We may use such information to analyze trends, administer the Site, track users' movement around the Site, and gather demographic information.
Data from Cookies	Upon usage of Site	Optional	Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. "Cookies" are small text files that may be used, for example, to collect information about activity on the Site. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser. This data is collected in order for us to provide our site and keep you logged in. Certain cookies and other technologies may serve to recall Personal Information, such as an IP address, previously indicated by a user

<p>Site Usage Information from Google Analytics (including how often you visit the Site, what pages you visit within the Site, and what other sites you used prior to coming to this Site)</p>	<p>Upon usage of Site</p>	<p>Mandatory</p>	<p>The information we receive from Google Analytics is used to maintain and improve the Site and our products. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Analytics Terms of Service, available at <a href="http://www.google.com/analytics/terms/us.html">http://www.google.com/analytics/terms/us.html</a>, and the Google Privacy Policy, available at <a href="http://www.google.com/policies/privacy/">http://www.google.com/policies/privacy/</a>.</p>
<p>Personal Information of Others (Email Addresses, Third Party Website Account User Names/ID)</p>	<p>Upon sending invitations to others through the Site</p>	<p>Optional</p>	<p>This data is used in order to enable you to invite your friends to use our Site by sending them an invitation email or message. Inviting friends may be done by either using the Site to send or post an invitation message via your Third Party Account and/or by using the Site to send an invitation email to your friend's external email address (for example, a Gmail address).</p>

User Submissions	Upon upload to the Project Gallery, competitions or other submissions to the Site	Optional	This is currently relevant only for the Project Gallery website. The notices and tools that we provide on the Site are intended to inform you which information will be made publicly available and how this information will be otherwise used. If the information is submitted in connection with a specific program or competition, it can be used for that program or competition (such as whether you will win a prize) or as part of publications related to such programs or competitions. If you publish your contact information in any User Submissions, you may receive unsolicited messages from other users of the Site or the public. We, therefore, encourage you only to post information that you are sure you want to be accessible to anyone. This information may be publicly available to other Site users, and may also be accessed and used by people off the Site.
Criminal & Identity Background Screenings	Upon application for employment or volunteer position	Mandatory	Applicants for adults administering and/or hosting programs (SIP, Clubs, Campus) are required to provide personal information to verify eligibility, which is reviewed internally by GWC Staff.
Financial Documents for Income Verification	Upon application for stipend	Mandatory	Applicants for stipend application upload documents to confirm program eligibility, which is reviewed internally by GWC Staff.

## User Submissions

5. **Publicly Available Information.** Any content that you post on or via the Site (“User Submissions”) may be publicly available to other Site users, and may also be accessed and used by people off the Site. The notices and tools that we provide on the Site are intended to inform you which information will be made publicly available. If you publish your contact information in any User Submissions, you may receive unsolicited messages from other users of the Site or the public. We, therefore, encourage you only to post information that you are sure you want to be accessible to anyone.
6. **Disclosing Personal Information.** We may transfer your Personal Information to our subsidiaries or affiliated companies, if any, for the purpose of storing or processing such information on our behalf. Such information

may be transferred to other countries. We require that these parties agree to process such information in compliance with our Privacy Policy.

**6.1.** We may share your Personal Information with our third party service providers and partners, but only to assist us with our business operations and to provide our Site to you and other users. We use commercially reasonable efforts to only engage or interact with third party service providers and partners that post a privacy policy governing their processing of Personal Information.

**6.2.** We may disclose your Personal Information or any information you submitted via the Site if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our Terms, including investigations of potential violations thereof; (iii) detect, prevent, or otherwise address fraud or security issues; or (iv) protect against harm to the rights, property or safety of GWC, our users, yourself or the public.

7. **Use of Anonymous Information.** We may use Anonymous Information (as defined below) or disclose it to third party service providers in order to improve our Site and enhance your experience with the Site. We may also disclose Anonymous Information (with or without compensation) to third parties, including advertisers and partners. "Anonymous Information" means information which does not enable identification of an individual user, such as aggregated information about the use of our Site.
8. **Opting Out.** You may choose not to receive future promotional, advertising, or other Site-related emails from us by selecting an unsubscribe link at the bottom of each email that we send. Please note that even if you opt out of receiving the foregoing emails, we may still send you a response to any "Contact Us" request as well as administrative emails (for example, in connection with a password reset request) that are necessary to facilitate your use of the Site.
9. **Choice.** At all times, you may choose whether or not to provide or disclose Personal Information. If you choose not to provide mandatory Personal Information, you may still visit parts of the Site, but you may be unable to access certain options, programs, offers, and services that involve our interaction with you.
10. **Access/Accuracy.** To the extent that you do provide us with Personal Information, we wish to maintain accurate Personal Information. If you would like to delete or correct any of your other Personal Information that we may be storing, you may submit an access request by sending an email to [hq@girlswhocode.com](mailto:hq@girlswhocode.com). Your email should include adequate details of your request.
11. **Links to and Interaction with Third Party Products.** The Site may enable you to interact with or contain links to your Third Party Account and other third party websites, mobile software applications and services that are not owned or controlled by us (each a "Third Party Service"). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services may collect Personal Information from you. Accordingly, we encourage you to read the terms and conditions and privacy policy of each Third Party Service that you choose to use or interact with.
12. **Security.** The security of Personal Information is important to us. We follow generally accepted industry standards, including the use of appropriate administrative, physical and technical safeguards, to protect the Personal Information submitted to us. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use reasonable acceptable means to protect your Personal Information, we cannot guarantee its absolute security or confidentiality. If you have any questions about security on the Service, you can contact us at [hq@girlswhocode.com](mailto:hq@girlswhocode.com).
13. **Merger, Sale or Bankruptcy.** In the event that we are acquired by or merged with a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer or assign Personal Information in connection with the foregoing events.
14. **Our California Do Not Track Notice.**

We do not currently respond or take any action with respect to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer's online activities over time and across third-party web

sites or online services. We may allow third parties, such as companies that provide us with analytics tools, to collect personally identifiable information about an individual consumer's online activities over time and across different web sites when a consumer uses the Site.

15. **Deletion of Content from California Residents.** If you are a California resident under the age of 18 and a registered user, California Business and Professions Code Section 22581 permits you to remove content or Personal Information you have publicly posted. If you wish to remove such content or Personal Information and you specify which content or Personal Information you wish to be removed, we will do so in accordance with applicable law. Please be aware that after removal you will not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or Personal Information you have posted and that there may be circumstances in which the law does not require us to enable removal of content.
16. **Commitment.** We are committed to protecting your privacy. Protecting your privacy online is an evolving area, and we are constantly evolving our Service to meet these demands. If you have any comments or questions regarding our Privacy Policy, or your Personal Information that we may be storing and using, please contact us at [hq@girlswhocode.com](mailto:hq@girlswhocode.com).