



# 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](#).

In addition, 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.

We've also made a short video for children that highlights the most important details in our Children's Privacy Policy that they should know about

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 [Clubs Privacy Policy](#). As used in this Children's Privacy Policy and the Clubs Privacy Policy, parents shall also include legal guardians. For our full Clubs Privacy Policy, please see [here](#). Any terms not defined in this Children's Privacy Policy are defined in the [Clubs Privacy Policy](#).

Girls Who Code voluntarily aligns with the U.S. Children's Online Privacy Protection Act and its implementing regulations under the Children's Online Privacy Protection Rule (collectively "COPPA"). While the Federal Trade Commission ("FTC") [guidance](#) is clear that nonprofits, such as Girls Who Code, are not subject to COPPA, Girls Who Code has chosen to voluntarily align our practices with COPPA as we feel it is in the best interest of children. 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 when using the term "children" in this Children's Privacy Policy we are referring 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 aligns with 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?

We collect three types of information about children: (1) information that children voluntarily provide us by using the Club Services, (2) information collected automatically as result of children's use of the Clubs Service, and (3) information we collect about children from their [Teacher Facilitator](#), [Outside School Clubs Facilitator](#), or parent.

The statements we make regarding the information we collect from or about students and children using the [Clubs Services](#) differentiates those student and child accounts into two categories:

### [Clubs within Schools](#)

- [Club Student Account](#): Accounts for children in a School Club.
- [Club Student User](#): A student in a School Club, regardless of age.

### [Clubs Outside School](#)



- [Outside School Clubs Child Account](#): Accounts for children under 13 years of age in an Outside School Club (such as a library or community center).
- [Outside School Clubs Child User](#): A child under 13 years of age in an Outside School Club.
- [Outside School Minor Account](#): Accounts for children between 13-17 years of age in an Outside School Club.
- [Outside School Minor User](#): A child between 13-17 years of age in an Outside School Club.
- [Users](#) with either an [Outside School Clubs Child Account](#) or [Outside School Minor Account](#) are collectively referred to as "[Outside School Learner Users](#)".

How we use information applies equally to all [Clubs Student Users](#) and [Outside School Learner Users](#) regardless of their age. Accordingly, where this Children's Privacy Policy references [Clubs Student Users](#) and [Outside School Learner Users](#), or any information collected from or about [Clubs Student Users](#) or [Outside School Learner Users](#), it applies to [Clubs 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, we have different data retention policies as this information would not be retained beyond account deletion as may be required under the Family Educational Rights and Privacy Act ("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 [Clubs Student Users](#) and [Outside School Learner Users](#) necessary to register for a [Clubs](#) account on the [Clubs Services](#). Additionally, Girls Who Code will not condition a child's participation in an online activity on the Clubs 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 Clubs Service and for security and safety purposes. For more detail on the categories of [Personal Information](#) collected from [Clubs 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](#).

## Information collected about Club Student Users in School Clubs

- **Account Creation Data and Profile Information**

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

If a [Clubs Student User's](#) school or [Teacher Facilitator](#) elects to utilize [Clubs Student Accounts](#) in school in connection with [School Clubs](#) or otherwise sets up a [Clubs 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 [Clubs Student Account](#) on behalf of the [Clubs Student Users](#) and let [Clubs Student Users](#) use the [Clubs Service](#) for [Educational Purposes](#). For clarity, while Girls Who Code is choosing to align 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](#).

**Ways to set up a Club Student Account:**

(1) **By the [Clubs Student User](#):** The [Teacher Facilitator](#) will provide the [Clubs Student User](#) with a [School Club](#) code (either via email or a displayed code in class) to enable the student to set up their [Clubs Student Account](#). When [Club Student Users](#) set up their own [Club Student Account](#), we ask [Club Student Users](#) to provide their country of residence, date of birth, name, unique username or email, and password. Additionally, as part of their account creation, [Club Student Users](#) may provide the additional information set forth in the "Education and Other Demographic Information" section below. If the [Clubs Student User](#) does not have the [School Club](#) code, they will not be able to set up their [Clubs Student Account](#). 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](#) when setting up a [Club Student Account](#).

(2) **By the [Teacher Facilitator](#):** Alternatively, sometimes a [Teacher Facilitator](#) may choose to create [Club Student Accounts](#) for [Club Student Users](#). When a [Teacher Facilitator](#) sets up the [Club Student Account](#), we ask the [Teacher Facilitator](#) to provide the student's first name only. We then generate a unique username and password for the [Teacher Facilitator](#) to distribute. 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.

(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. We then seek to obtain [parental consent](#) in order to proceed with creating their child's [Club Student Account](#). After providing consent, the parent can then create a [Club Student Account](#) for their child. In accordance with COPPA, we may ask the parent to provide their child's date of birth. They will also provide their child's first name, last name, relationship to them, a unique username or email and password for their child to access their [Club Student Account](#). After creating the account for their child, they will enter the [School Club](#) code provided by the [Teacher Facilitator](#) (via email or directly). After confirming they are enrolling their child in the correct [School Club](#), the parent may provide the additional information set forth in the "Education and Other Demographic Information" and "Location Information" sections below. Once the child is connected to a school, the parent may also access the [Club Student Account](#) through their parent account. Parents may also set up a 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).

**Additional information that can be collected on a Club Student Profile:**

Once a [Clubs Student Account](#) is created (whether created by the [Clubs Student User](#), [Teacher Facilitator](#), or parent), and parental consent is obtained as needed (including through school consent for [Clubs Student Accounts](#)), children may choose to personalize their account in their user profile by adding an avatar or brief user bio within their profile. The user bio is only visible to the [Teacher Facilitator](#) or [Clubs Signatory](#). The avatar may be visible to other [Club Student Users](#) or [Outside School Learner Users](#) in different Clubs if the [Club Student Users](#) choose to post in a Clubs-wide Project Gallery or Clubs-wide message board (see "User Generated Content" section below). [Club Student Users](#) may also override the automatically collected timezone (see "Location Information" section below) to view [GWC Clubs HQ](#) Calendaring Tool sessions or Optional Virtual Events (see relevant sections below) in a different timezone than their browser settings, as needed. Finally, [Club Student Users](#) may choose to add whichever of their email or username they did not previously use in setting up their [Club Student Account](#).

- **Education and Other Demographic Information**

After a [Clubs Student Account](#) has been created by the [Clubs Student User](#), they will be asked to provide their current grade level to finish enrolling in their Club. If the [Clubs Student Account](#) is created by the parent, the parent will be asked to provide their child's current grade. Please note, if the [Clubs Student Account](#) is created by the [Teacher Facilitator](#), they will not be asked to provide this information as part of the enrollment of the [Clubs Student User](#) whose account they have created. However, the [Teacher Facilitator](#) may also provide aggregate information on the [School Club's](#) race/ethnicity makeup and reduced or free lunch status.

- **User-Generated Content of Club Student Users**

Once a [Clubs Student Account](#) is created (whether created by the Clubs Student User, [Teacher Facilitator](#), or parent), and parental consent is obtained as needed (including through school consent for [Clubs Student Accounts](#)), children will be able to post in their [Clubs Student Accounts](#) and interact with the Girls Who Code curriculum. This includes answering open ended questions within the GWC curriculum and answering multiple choice self- assessment questions within the GWC curriculum. Additionally, [Club Student Users](#) may submit projects on the Project Gallery, which include the [Club Student User](#) uploading a cover photo for the project, and the option of also providing a URL which may contain video or voice recording, a description of the project, and/or additional files.

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.

Additionally, a [Teacher Facilitator](#) may generate a certificate for any of their [Club Student Users](#) which can be shared with the [Club Student User](#). Finally, the status of a Clubs Student User's Project Gallery submission is collected by GWC Clubs HQ as metadata to help Girls Who Code make sure all submissions are reviewed prior to being published. For more information on who can see a [Club Student Users](#) project on the Project Gallery, please see "What Children's Information is Visible to Others" below.

- **Messaging and other User Communications**

Children with [Club Student Accounts](#) may post messages to their [Teacher Facilitator](#) on the Girls Who Code messaging board (unless your child's [Teacher Facilitator](#) disables this option), and may also receive feedback from their [Teacher Facilitator](#). A [Teacher Facilitator](#) may also collect a Club Student User's email address (to send them their [School Club](#) code), and first name (if creating their [Clubs Student Accounts](#)) while responding to messages. Additional information that may be linked to the message includes the school name, school address and location for the use of School Club related communications. This information will be linked to the [Club Student User](#) and [Teacher Facilitator](#)'s accounts 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 [Club Student User](#), and any activities or projects assigned by the [Teacher Facilitator](#) or comments from [Club Student User](#)'s [Teacher Facilitator](#) on curricular activities.

- **GWC Clubs HQ Calendaring Tool**

GWC Clubs HQ includes a Calendaring Tool that allows [Teacher Facilitators](#) and Girls Who Code to notify Club Students about upcoming in-person or virtual activities or sessions. Club Students may select a session to learn more about when and where it will be hosted, but Club Students will not be asked to provide any personal information themselves.

[Teacher Facilitators](#) can create sessions on the GWC Clubs HQ Calendaring Tool by providing the following information about [Club Student Users](#) in their School Club: Club Student User's name, the session time, session date, summary of the session, and location of the session (if the session is being hosted virtually, [Teacher Facilitators](#) may link a url to a virtual events tool of their choice, which is not shared with Girls Who Code). To learn more about the GWC Clubs HQ Calendaring Tool, see the "[My Calendar FAQ](#)".

- **Optional Virtual Events Information**



[Clubs Student Users](#) may voluntarily choose to participate in a Girls Who Code optional virtual event, which may be open to both [Club Student Users](#) and [Outside School Learner Users](#) from different GWC Clubs. An individual [Club Student User](#), for themselves, or a [Teacher Facilitator](#), for their School Club, may register for an optional event through the GWC Clubs HQ Calendaring Tool.

If a [Club Student User](#) or, on their behalf, their [Teacher Facilitator](#), registers for the optional event, the [Club Student User](#) may be prompted to select a link through GWC Clubs HQ Calendaring Tool to a Virtual Event Tool (using systems such as Zoom, google, etc., each a “Virtual Event Tool”) on behalf of Girls Who Code, where they will register for the optional event. [Club Student Users](#) will share their name, email address, and the School Club code their [Teacher Facilitator](#) provides them. In order to participate in the Girls Who Code Event, the [Club Student User](#) will additionally be asked to provide information to confirm event attendance (through name and email). Once in the event, [Club Student Users](#)’ information will be collected and reported to Girls Who Code by the Virtual Event Tool to share how long the [Club Student User](#) stayed in the Virtual Event.

Girls Who Code also collects information from [Teacher Facilitators](#) regarding Virtual Event Tools, including the name of [Club Student Users](#) within the School Club for which the [Teacher Facilitator](#) has registered.

Certain information is captured by the Virtual Event Tools through the Clubs Student User participation in a virtual event session (“Virtual Event Tool Recordings”) such as [Club Student Users](#)’ image, voice, webinar ID, email, movements, and other audio information as well as chat logs or other information provided during the virtual event session. GWC obtains this information through downloading recordings or reports from the Virtual Event Tool. This includes treating GWC’s use of Zoom as an Education Account to apply additional privacy, security and safety features and settings offered to schools. See Zoom’s Children’s Educational Privacy Statement found [here](#). The virtual event sessions (including transcripts and chat logs) are recorded from the perspective of all present attendees (including your child) 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, read the Zoom Retention Policy. Otherwise, please see the GWC FAQ on retention.

- **Location Information**

We never request precise location data from [Club Student Users](#) and no [Club Student User](#) location data is available publicly. [Club Student Users](#) provide their country of residence as part of their Account Creation (See “Account Creation Information” section above). [Club Student Users](#) may also provide location data when overriding the automatically collected timezone within their profile (See “Additional information that can be collected on a Club Student Profile” section). Additionally, if a parent is creating a [Club Student Account](#), they will also be asked to



provide their child's country of residence as part of the Account creation (See "Account Creation Information" section above).

From [Club Student User](#), the primary form of location data is based on IP Addresses. If children upload photos or videos from their computers directly, Girls Who Code collect what the device sends. If the device sends 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 location data from the photo before it is viewed by other Users (e.g., the person receiving a message).

- **Surveys**

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 years old regarding topics such as their satisfaction with School Clubs and what topics [Club Student Users](#) would like to see in the future with School Clubs. The surveys do not allow for free text-form responses. [Club Student Users](#) may also respond to a short anonymous survey to rate which coding activities match their interest by answering questions about the type of device they have, preference for block-based coding or text-based coding, and topics of interest (e.g. gaming, digital art, web development). Finally, after completing an activity in the Curriculum, [Club Student Users](#) may choose to provide feedback (rating from 1-3) on the activity.

- **Conduct and Safety Information**

If any user needs to [report any abuse](#) or inappropriate content on a [School Club](#) that has not been addressed by the connected [Teacher Facilitator](#), they may do so by using the [Report Post Button](#). If a [Clubs Student User](#) reports another user in their Club on the [Club Service](#) (e.g. such as through a "report a message" button) for conduct or safety issues, Girls Who Code collects the information provided in the report (e.g. the user reporting and the content being reported) to investigate the report and will share that information as required to the [Teacher Facilitator](#) or School Administrator.

- **Additional Information collected while providing Club Services**

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 [Clubs Privacy Policy](#), this includes guidance, policies, and limitations on [Cookies](#) collection, Local Storage, Device-specific information (such as platform, operating system, device ID, and device type), [Server log information](#), [IP address](#), and product events data (such as the last activity a child started, whether they viewed a certain report).





## Information collected about Outside School Learner Users in Outside School Clubs

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

Currently, [Outside School Club Child Accounts](#) (for children under 13) and [Outside School Minor Accounts](#) (for children 13-17) used for Outside School Clubs are created in the following ways: (1) by the [Outside School Minor User](#) themselves using an Outside School Club code provided by their adult leading their Club ("Outside School Club Facilitator"); or (2) by the parent of the Outside School Learner User. Below we have outlined the account set up process for the two types of users: [Outside School Club Child Account](#) (children under 13), and [Outside School Minor Account](#) (children 13-17):

### **Ways to set up an Outside School Club Child Account:**

**By the parent:** For an [Outside School Clubs Child User](#), a parent must set up an [Outside School Club Child Account](#). A parent will first need to create a parent account. We then seek to obtain [parental consent](#) in order to proceed with creating their child's [Outside School Club Child Account](#). After providing consent agreeing to the [parental consent](#) notice, the parent can then create an [Outside School Club Child Account](#) for their child. In accordance with COPPA, we will ask the parent to provide their child's date of birth. They will also provide their child's first name, last name, relationship to them, a unique username or email and password for their child to access their [Outside School Club Child Account](#). After creating the account for their child, they will enter the Outside School Club code provided by the Outside School Club Facilitator (via email or directly). After confirming they are enrolling their child in the correct Outside School Club, the parent may provide the additional information set forth in the "Education and Other Demographic Information" and "Location Information" sections below. Once the child is connected to an Outside School Club, the parent may also access the [Outside School Club Child Account](#) through their parent account.

If an [Outside School Clubs Child User](#) attempts to create an account without parent consent, they will not be able to move forward. If this occurs, we will only use the information the child has provided (name, country of residence, and birth date) in order to determine whether or not they are under 13 and thus require their parent to create their [Outside School Club Child Account](#). In these cases, we do not store any of the provided information input by the Child. Instead, the GWC Clubs HQ will direct an [Outside School Clubs Child User](#) to ask a parent to create an account and provide parent consent (see above) prior to allowing the child further access to the [Club Service](#) or collecting any additional [Personal Information](#) from the child.

### **Ways to set up an Outside School Minor Account:**

(1) **By the Outside School Minor User:** The [Outside School Club Facilitator](#) will provide the [Outside School Minor User](#) with an Outside School Club code (either via email or a displayed

code in person) to enable the student to set up their [Outside School Minor Account](#). When [Outside School Minor Users](#) set up their [Outside School Minor Account](#), we ask [Outside School Minor Users](#) to provide their country of residence, date of birth, name, unique username or email, and password. Additionally, as part of their account creation, [Outside School Minor Users](#) may provide the additional information set forth in the "Education and Other Demographic Information" and "Location Information" section below. If the [Outside School Minor User](#) does not have the Outside School Club code, they will not be able to set up their [Outside School Minor Account](#).

(2) **By the parent:** A parent may choose to set up their child's [Outside School Minor Account](#), although it is not required as [Outside School Minor Account](#)'s are for children over the age of 13 and do not require parental consent. If they choose to do so, the parent will first need to create a parent account. The parent can then create an [Outside School Minor Account](#) for their child. The parent may provide their child's first name, last name, relationship to them, a unique username or email and password for their child to access their [Outside School Minor Account](#). After creating the account for their child, they will enter the Outside School Club code provided by the Outside School Club Facilitator (via email or directly). After confirming they are enrolling their child in the correct Outside School Club, the parent may provide the additional information set forth in the "Education and Other Demographic Information" and "Location Information" sections below. Once the child is connected to an Outside School Club, the parent may also access the [Outside School Minor Account](#) through their parent account.

**Additional information that can be collected on an Outside School Learner User's Profile:**

Once an [Outside School Clubs Child Account](#) or [Outside School Minor Account](#) is created (whether created by the Outside School Learner User or parent), and parental consent is obtained as needed (for [Outside School Club Child Accounts](#)), children may choose to personalize their account in their user profile by adding an avatar or brief user bio within their profile. The user bio that is only visible to the [Outside School Club Facilitator](#) or Clubs Signatory. The avatar may be visible to other [Club Student Users](#) or [Outside School Learner Users](#) in different Clubs if the [Outside School Learner Users](#) choose to post in a Clubs-wide Project Gallery or Clubs-wide Message board (see "User Generated Content" section below). [Outside School Learner Users](#) may also override the automatically collected timezone (see "Location Information" section below) to view GWC Clubs HQ Calendaring Tool sessions or Optional Virtual Events (see relevant sections below) in a different timezone than their browser settings, as needed. Finally, [Club Student Users](#) may choose to add whichever of their email or username they did not previously use in setting up their [Club Student Account](#).

- **Education and Other Demographic Information**

After an [Outside School Minor Account](#) has been created by the [Outside School Minor User](#), they will be asked to provide their current grade level to finish enrolling in their Club. When the



[Outside School Clubs Child Account](#) or [Outside School Minor Account](#) is created by the parent, the parent will be asked to provide their child's current grade.

- **User-Generated Content of Outside School Learners Users**

Once an [Outside School Clubs Child Account](#) or Outside School Club Minor Account is created (whether created by the [Outside School Minor User](#), or, as required for an [Outside School Clubs Child User](#), their parent), and parental consent is obtained as needed, children will be able to post in their Outside School Club Child Account or [Outside School Minor Account](#) and interact with the Girls Who Code curriculum. This includes answering open ended questions within the GWC curriculum and answering multiple choice self- assessment questions within the GWC curriculum. Additionally, [Outside School Learner Users](#) may submit projects on the Project Gallery, which include the [Outside School Learner Users](#) uploading a cover photo for the project, and the option of also providing a URL which may contain video or voice recording, a description of the project, and/or additional files.

Additionally, an [Outside School Club Facilitator](#) may generate a certificate for any of their Outside Club Learner Users which can be shared with the Outside Club Learner Users. Finally, the status of a Clubs Student User's Project Gallery submission is collected by GWC Clubs HQ as metadata to help Girls Who Code make sure all submissions are reviewed prior to being published. For more information on who can see an Outside School Learner User's project on the Project Gallery, please see "What Children's Information is Visible to Others" below.

- **Messaging and other User Communications**

Children with [Outside School Club Child Accounts](#) or [Outside School Minor Accounts](#) may post messages to their Outside School Club Facilitator on the Girls Who Code messaging board, which is visible to all Girls Who Code Clubs Users (unless your child's Outside School Club Facilitator disables this option) and may also receive feedback from their Outside School Club Facilitator. An Outside School Club Facilitator may also collect an Outside School Learner User's email address (to send them their Outside School Club code), and first name (if creating their [Outside School Club Child Account](#) Or [Outside School Minor Account](#)) while responding to messages. Additional information that may be linked to the message includes the club name, club address, and location for the use of Outside School Club related communications. This information will be linked to the Outside School Learner User and [Outside School Club Facilitator's](#) accounts 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 an Outside School Learner User, and any activities or projects assigned by the [Outside School Club Facilitator](#) or comments from Outside School Learner User or [Outside School Club Facilitator](#) on curricular activities.



- **GWC Clubs HQ Calendaring Tool**

GWC Clubs HQ includes a Calendaring Tool that allows [Outside School Club Facilitators](#) and Girls Who Code to notify [Club Student Users](#) about upcoming in-person or virtual activities or sessions. [Club Student Users](#) may select a session to learn more about when and where it will be hosted, but [Club Student Users](#) will not be asked to provide any personal information themselves.

[Outside School Club Facilitators](#) can create sessions on the GWC Clubs HQ Calendaring Tool by providing the following information about [Club Student Users](#) in their School Club: [Club Student Users](#)' name, the session time, session date, summary of the session, and location of the session (if the session is being hosted virtually, [Teacher Facilitators](#) may link a url to a virtual events tool of their choice, which is not shared with Girls Who Code). To learn more about the GWC Clubs HQ Calendaring Tool, see the "[My Calendar FAQ](#)".

- **Optional Virtual Events Information**

Outside Club Learner Users may voluntarily choose to participate in a Girls Who Code optional virtual event, which may be open to both [Club Student Users](#) and [Outside School Learner Users](#) from different GWC Clubs. An individual Outside School Learner User, for themselves, or an [Outside School Club Facilitator](#), for their Outside School Club, may register for an optional event through the GWC Clubs HQ Calendaring Tool.

If an Outside School Learner User or, on their behalf, their [Outside School Club Facilitator](#), registers for the optional event, the Outside School Learner User may be prompted to select a link through GWC Clubs HQ Calendaring Tool to a Virtual Event Tool (using systems such as Zoom, google, etc., each a "Virtual Event Tool") on behalf of Girls Who Code, where they will register for themselves or their Outside School Club for an optional event. [Outside School Learner Users](#) will share their name, email address, and the School Club code their [Outside School Club Facilitator](#) provides them. In order to participate in the Girls Who Code Event, the Outside School Learner User will additionally be asked to provide information to confirm event attendance (through name and email). Once in the event, [Outside School Learner Users](#)' information will be collected and reported to Girls Who Code by the Virtual Event Tool to share how long the Outside Club Learner User stayed in the Virtual Event.

Girls Who Code also collects information from [Outside School Club Facilitators](#) regarding Virtual Event Tools, including the name of [Outside School Learner Users](#) within the Outside School Clubs for which the [Outside School Club Facilitator](#) has registered.

Certain information is captured by the Virtual Event Tools through the Outside School Learner User's participation in a virtual event session ("Virtual Event Tool Recordings") such as Outside School Learner User's image, voice, webinar ID, email, movements, and other audio information as well as chat logs or other information provided during the virtual event session. GWC



obtains this information through downloading recordings or reports from the Virtual Event Tool. This includes treating GWC's use of Zoom as an Education Account to apply additional privacy, security and safety features and settings offered to schools. See Zoom's Children's Educational Privacy Statement found [here](#). The virtual event sessions (including transcripts and chat logs) are recorded from the perspective of all present attendees (including your child) 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 GWS's safety and quality teams as needed. To learn more, read the Zoom Retention Policy. Otherwise, please see the GWC FAQ on retention.

## ● Location Information

We never request precise location data from [Outside School Learner Users](#) and no [Outside School Learner Users](#) location data is available publicly. [Outside School Learner Users](#) provide their country of residence as part of their Account Creation (See "Account Creation Information" section above). [Outside School Learner Users](#) may also provide location data when overriding the automatically collected timezone within their profile (See "Additional information that can be collected on an [Outside School Learner Users' Profile](#)" section). Additionally, if a parent is creating an [Outside School Learner Users](#), they will also be asked to provide their child's country of residence as part of the Account creation (See "Account Creation Information" section above).

From [Outside School Learner Users](#), the primary form of location data is based on IP Addresses. If children upload photos or videos from their computers directly, Girls Who Code collect what the device sends. If the device sends 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 location data from the photo before it is viewed by other Users (e.g., the person receiving a message).

## ● Surveys

Girls Who Code may also collect anonymous (not requiring the individual to submit their name or other identifying information) survey data from [Outside School Minor Users](#) that are over 13 years old regarding topics such as their satisfaction with [Outside School Clubs](#) and what topics [Outside School Minor Users](#) would like to see in the future with [Outside School Clubs](#). The surveys do not allow for free text-form responses. [Outside School Minor Users](#) may also respond to a short anonymous survey to rate which coding activities match their interest by answering questions about the type of device they have, preference for block-based coding or text-based coding, and topics of interest (e.g. gaming, digital art, web development). Finally, after completing an activity in the Curriculum, [Outside School Minor Users](#) may choose to provide feedback (rating from 1-3) on the activity.



- **Conduct and Safety Information**

If any user needs to [report any abuse](#) or inappropriate content on a [Outside School Clubs](#) that has not been addressed by the connected [Outside School Clubs Facilitator](#), they may do so by using the [Report Post Button](#). If a [Outside School Learner User](#) reports another user in their Club on the [Club Service](#) (e.g. such as through a “report a message” button) for conduct or safety issues, Girls Who Code collects the information provided in the report (e.g. the user reporting and the content being reported) to investigate the report and will share that information as required to the [Outside School Clubs Facilitator](#) or [Community Partner](#).

- **Additional Information collected while providing Club Services**

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 [Clubs Privacy Policy](#), this includes guidance, policies, and limitations on [Cookies](#) collection, Local Storage, Device-specific information (such as platform, operating system, device ID, and device type), [Server log information](#), [IP address](#), and product events data (such as the last activity a child started, whether they viewed a certain report).

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?

First and foremost, you should know that GWC does not [sell](#) or rent any of 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 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 Relevant Advertising](#) for third-party educational products and [Club Services](#) that we believe may be of interest to you (e.g., our Summer Immersion Program). In addition to the uses mentioned above, we use the information we collect



from [Clubs Student Users](#) and [Outside Clubs Learner Users](#) to provide and improve (as allowed by law) the [Clubs Service](#) to the child or Minor, for educational purposes security and safety purposes, as authorized by law, or to enforce our Terms. If we discover that we have collected information from a child 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. Additionally, [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) and children's Personal Information is never sold or rented to anyone, including marketers and advertisers.

We may present [Contextually Relevant Advertising](#) (not using Personal Information of a [Club Student User](#) or [Outside School Learner Users](#)) to Club Student Users or Outside School Learner Users over the age of 13 for either our own educational products or third-party educational products and services that we believe may be of interest to you (e.g., our Summer Immersion Program). We will only present such products for educational, non-commercial purposes.

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](#).

Additionally, at any time, for [Outside School Learner Users](#) you may also agree to the collection and use of your child's [Personal Information](#), but choose not to allow disclosure to certain third parties (unless disclosure is integral to the Service).

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](#).

### School Club Use

If your child is in a [School Club](#), their [Personal Information](#) in their [Clubs Student Account](#) will be visible to themselves, you as their parent, their [Teacher Facilitator](#), [Club Signatory](#), and their [School Club Administrator](#). Other [Club Student Users](#) in your child's School Club may see your child's name and photo, but will not otherwise view their individual [Club Student Account](#). Your child will also have the opportunity to ask and answer questions about the curriculum and GWC activities (see "User Generated Content" sections above in "WHAT INFORMATION DOES GIRLS WHO CODE COLLECT FROM CHILDREN"), 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 [School 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. This project may be visible to any user logged into [GWC Clubs-HQ](#), (but not the general public), if the [Teacher Facilitator](#) has not disabled the project gallery sharing option for their [School Club](#).

### **Outside School Club Use**

If your child is in an [Outside School Club](#), their [Personal Information](#) in their [Outside School Club Child Account](#) or [Outside School Minor Account](#) 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](#). Other children in your child's Outside School Club may see your child's name and photo, but will not otherwise view their individual [Outside School Club Child Account](#) or [Outside School Minor Account](#). Your child will also have the opportunity to ask and answer questions about their the curriculum and GWC activities (see "User Generated Content" sections above in "WHAT INFORMATION DOES GIRLS WHO CODE COLLECT FROM CHILDREN"), 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 Clubs 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. This project may be visible to any user logged into [GWC Clubs-HQ](#), (but not the general public), if the [Outside School Club Facilitator](#) has not disabled the project gallery sharing option for their [Outside School Club](#).

### **Direct Service Use for Club Student Users**

If your child is using Girls Who Code independently or as part of a Girls Who Code activity outside of Clubs in [Direct Programming](#) (ex. GWC Challenge), 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 [Club 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](#), [Outside School Minor Accounts](#), and [Club Student Accounts](#).

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.

## 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 to fulfill the purpose for which the information was collected, including for [Educational Purposes](#), to comply with legal obligations and to keep our platform safe and secure, 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](#), [Outside School Minor 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 see our Information [Transparency Chart](#) for more details on specific retention periods.

Please note that certain content 1) within a [Clubs Student Account](#) (uploaded by the [Clubs Student Account](#), [Teacher Facilitator](#), or parent), such as photos, videos, Projects, or 2) uploaded by a [Teacher Facilitator](#), [School Club sAdministrator](#), parent, or [Clubs Student User](#) through the [Clubs Services](#) may be kept after deletion of a [Clubs Student Account](#) as we are required to retain these at the direction of the school (e.g., for legal compliance reasons such as maintenance of "[Education Records](#)" under FERPA or "[Student Data](#)" under state student privacy laws or equivalent 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](#). We may retain [de-identified](#) information for as long as we deem appropriate or as otherwise required by law.

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 Student 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](#).

## 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, 2) in [Outside School Clubs](#), directly responding to requests from parents when the information is collected from an [Outside School Clubs Child User](#), and Girls Who Code obtains the [parent's consent](#) directly (not from the school [acting as the agent](#) of the parent and consenting) - such as when they are using Girls Who Code not connected to a school, or 3) in [Outside School Clubs](#), directly responding to request from parents of the Minor from an [Outside School Minor User](#)

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 [Clubs Privacy Policy](#) for more information on your rights.

1. [Outside School Clubs Child Account](#) or [Outside School Minor Account](#): If your child's [Outside School Clubs Child Account](#) or [Outside School Minor Account](#) was set up directly by your child, or you as their parent or legal guardian for an [Outside School Clubs Child Account](#) (only after we gather [parental consent](#)), or you allow your child access to the [Clubs 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) 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 in accordance with our identification processes.

## Stop Collecting Further [Personal Information](#) or Restrict Disclosure under COPPA

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 and request that we delete the personal information that we have already collected from your child as set forth above. Please keep in mind that deleting records may require us to terminate the account in question.

Additionally, at any time, for [Outside School Learner Users](#) you may also agree to the collection and use of your child's Personal Information, but choose not to allow disclosure to certain third parties (unless disclosure is integral to the Service).

## What Controls do Parents Have?

Parents of [Outside School Clubs Child Users](#) who have set up those [Outside School Club Child Accounts](#) maintain access to their child's account, and can review and request removal of any of their child's User-Generated content at their own discretion.

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 Clubs Child Users](#) whom we have direct [parental consent](#) for (e.g. for use of Girls Who Code outside of the school) or [Outside School Minor Users](#) themselves. 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. Finally, as a parent you may request that we limit the further collection of [Personal Information](#) and/or restrict further disclosure of the [Personal Information](#) we have collected to third parties. Parents of [Outside School Clubs Child Users](#) have access to and can edit and control their child's account.

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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 when acting as a [Controller](#)), we will still use the FTC COPPA consent methods described to provide further transparency for parents.