Girls Who Code Privacy Policy

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GWC-Led Services Privacy Policy Highlights

Last updated: December 1, 2024. You can see past versions of this policy here in our privacy center.

We believe you should always know what data we collect from you, how we use it, and that you should have meaningful control over both. We want to empower users to make the best decisions about the information that they share with us.

This Privacy Policy applies to the Girls Who Code GWC-Led Services (defined below) and does not apply to 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 informational website located at www.girlswhocode.com ("GWC Website").

You should read this policy in full, but here are a few key points:

- **Personal Information We Collect:** Please see this page where we detail the 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, and the third parties with whom we share or disclose Personal Information for a business purpose. You can also find more details below.

  We also have Online Tracking Technologies Policy.

- **How We Use the Information We Collect:** We use the Personal Information we collect from or about individuals who are engaging with the GWC provided services, including our summer programming, adult programming, and college programming ("GWC-Led Service Users") to provide and improve the services (including for security and safety purposes, or as allowed by law). You can also find more details below.

- **Data Retention:** We store GWC-Led Service Users Personal Information, for as long as it is necessary to provide products and Services to you and others. Personal Information associated with your account will be kept until your account is deleted or until we no longer need the information to provide the Service, whichever occurs first. Additionally, some information is deleted or anonymized after a set period of time. For additional information on our retention periods, see here.

- **Children.** GWC GWC-Led Services are not directed or available to Children (see here for more details). No Children's information is made available or visible to the general public through GWC, and no Children's information is used for behavioral targeting or Third Party advertising.

- **We Never Sell Personal Information:** We will never Sell or rent your Personal Information or non-personal information. We will only disclose Personal Information as set forth in this Privacy Policy, such as with a limited set of Third Party Service Providers necessary to provide or develop our services (such as database hosting) or as required by law, and we will be transparent about who these service providers are.

We will contractually require that these Third Party Service Providers process Personal Information in accordance with our instructions and consistent with this Privacy Policy. We ensure that these Third Party Service Providers employ reasonable and comprehensive data protection and security protocols. See here for more details.

- **You own your data:** We don't own any content or information you provide or we receive - you will own your content and information.

- **Security and Privacy by Design and Default:** We use security industry best practices to protect Personal Information, including using encryption and other security safeguards to protect Personal Information. We design products with security and privacy in mind from day one. See here for more information as well as our Security Whitepaper.

- **Transparency and Choice:** We will be transparent about our practices so that you can make meaningful choices about how your Personal Information is used. If we make a material change, we will provide prominent notice by posting a notice on our Services or this website page and/or we will notify you by email (if you have provided an email address to us). See here for more information.

- **Right to Access, Correction, and Deletion of Data:** GWC-Led Service Users can contact us at privacy@girlswhocode.com from the email used to create their account or they can use the features in their account settings to do so. See here for more information on all User's rights, including about any additional rights you may have depending on the jurisdiction you reside in.

Girls Who Code Privacy Policy

Last updated: December 18, 2024

INTRODUCTION AND SCOPE

Girls Who Code's mission is to close the gender gap in technology and to change the image of what a programmer looks like and does.

Keeping this trust through your privacy and safety is incredibly important to us.

This 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, delete your information, and take your information out of Girls Who Code.

We will only collect, use, and share your Personal Information in accordance with this Privacy Policy. This policy applies whether you login to use Girls Who Code through https://hq@girlswhocode.com

(the "GWC HQ"), or any services or products that link to this Privacy Policy that Girls Who Code, Inc. ("GWC", "we", "us", "our", and our subsidiaries or affiliates) may provide now or in the future (collectively, the "GWC-Led Services"). This Privacy Policy also covers GWC's treatment of any Personal Information about our users that our partners or other services share with us, for example, responses to a User survey collected through Alchemer.

This Privacy Policy applies solely to the GWC GWC-Led Services and does not apply Girls Who Code Clubs Services, which we offer in connection with community center or school use (located at https://clubs-hq.girlswhocode.com) (the "GWC Clubs HQ") nor does it apply to any other Girls Who Code Clubs Services or products offered by GWC ("Clubs Services"). The GWC Clubs Privacy Policy can be found here. This Privacy Policy also does not apply to our informational website located at www.girlswhocode.com ("GWC Website"). You can find the GWC Website Privacy Policy here.

This 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, any GWC-Led Service Third Party Platform Providers (as shared below) email campaigns, push or in-app notifications, or YouTube videos) on the GWC-Led Services. These other services have their own privacy policies, and we encourage you to review them before providing them with Personal Information.

GWC may be acting as both a Controller and a Processor as those terms are defined under the European Union's General Data Protection Regulation, including as implemented or adopted under the laws of the United Kingdom ("GDPR"), or as defined under any other applicable state privacy law in the United States. For more information, please see below.

Our Privacy Policy is designed to provide transparency into our privacy practices and principles. We've done our best to write this policy in simple, clear terms, but if you're not familiar with terms like Personal Information, Cookies, IP address, Pixel Tags, and browsers, read about these key terms.

We've also added summaries below each section that provide short explanations of the legal language in plain English (it starts with 'Basically...') to aid in understanding, but it isn't legally binding.

We hope you find this clear and friendly. If you have any questions, we're here to help. You can send us an email at privacy@girlswhocode.com .

Basically,

Protecting your privacy is incredibly important to us. This Privacy Policy is here to help you understand how we treat any Personal Information that you share with us when you use the GWC GWC-Led Services. This Privacy Policy applies solely to the GWC GWC-Led Services and does not apply to the GWC Clubs program or Products - you can find the GWC Clubs Privacy Policy here. Other companies that GWC doesn't own or control will have their own privacy policies, and you should read them, too!

ACKNOWLEDGMENT AND CONSENT

By using the GWC-Led Services, you acknowledge that you accept and agree to this Privacy Policy. By visiting GWC HQ, or using our GWC-Led Services in any manner, you acknowledge that you accept the terms, practices and policies described in this 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 GWC-Led Services. Your use of our GWC-Led Services is at all times subject to our Terms of Service (as updated from time to time (the "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 Terms.

Basically,

By visiting our GWC HQ platform or using our GWC-Led Services, you agree that we may collect, use and share your information as described in our Privacy Policy.

WHAT OUR THE GWC GWC-Led Services?

GWC's GWC-Led Services encompass several different services, including our summer programs, our adult programs (like Hiring Season), and our college programming (like College Loops).

The GWC-Led Services may utilize the GWC platform, ("GWC HQ"), a web application with lightweight learning management tools connected to our custom curriculum resources. The GWC-Led Services may also utilize Third Party providers (e.g. to perform the coding operations) in connection with the GWC-Led Services ("Third Party Platform Providers").

To learn more about the GWC-Led Services, see our GWC-Led Services FAQ here.

WHAT INFORMATION DOES GWC COLLECT?

We collect two types of information about you: (1) information that you voluntarily provide us by using the GWC-Led Services (described below under "Information You Provide to Us") and (2) information collected automatically as result of your use of the Services (described below under "Information We Collect Automatically"). Both types of information may be collected for us through partners, vendors, and trusted organizations ("Third Party Service Providers") to process the information on our behalf in accordance with our instructions, Privacy Policy, and any other appropriate confidentiality and security requirements. We may also receive information about you from Third Party sources (as described below under "Information Received from Third Party Sources"). The types and amounts of information collected will vary depending on what type of GWC-Led Service User you are (e.g. Program Applicant, Program Participant, Community Partner, GWC Personnel or Focus Group Participant) and how you use GWC. We have also created this chart with 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, and the third parties with whom we disclose Personal Information for a business purpose.

GWC-Led Services are not directed to Children

The GWC-Led Services 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 "How Can I Contact GWC with Questions" section below to have that child's information deleted.

Basically,

GWC asks for some information directly from GWC-Led Service Users(such as account information), and also collects some information automatically (such as debugging logs when errors occur) in order to provide you with the best possible GWC experience. 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, and the third parties with whom we disclose Personal Information for a business purpose.

Information You Provide To Us

We ask for and collect the following categories of Personal Information about you when you use the GWC-Led Services. When we act as a Controller, this information 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 GWC-Led Services, 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. Our use of the information set forth below is described in the section "How Does GWC Use the Information it Collects". There are currently five categories of GWC-Led Service Users: Program Applicant, Program Participant, Partner, GWC Personnel, or Focus Group Participant. Additionally, as a non-logged in visitor to the GWC Website, you may provide additional personal information as set forth in our separate GWC Website Privacy Policy. For GWC-Led Service Users, we collect and store the following categories of information:

- **Account Sign-Up and Profile Information:**
  In order to use certain GWC-Led Services that we offer via the GWC HQ platform, you may be required to create an account on GWC HQ ("GWC HQ Account") and provide certain registration information (such as first and last name and email address). GWC-Led Service Users can also add a bio about themselves on certain GWC-Led Service products. Additionally, you may be required to create an account on a Third Party Platform Provider in order to utilize certain GWC-Led Services (e.g. Replit). These Third Party Platform Providers have their own

privacy policies, and we encourage you to review them before providing them with Personal Information. You may also choose to sign up through an Authentication Service.

- **Affiliation Information:**
  For some GWC-Led Services, GWC-Led Service Users may provide information regarding the organization, post-secondary program, or community partner with which they are affiliated.

- **Demographic Information:**
  We may collect GWC-Led Service User demographic data (e.g. free or reduced lunch data) from GWC-Led Service Users. This data is reported in the aggregate for the purposes of supporting GWC programming and improving our GWC-Led Services.

- **Messaging and other User Communications:**
  GWC may collect messages between GWC-Led Service Users and between GWC-Led Service Users and the staff, activity sponsors, and/or volunteers who are administering the GWC Services ("GWC Personnel"). Please be aware that by using any GWC messaging or communication features, any message, photos, videos or other content shared can be viewed and possibly further shared (including outside of the GWC-Led Services) by all recipients.

- **Calendar:**
  We collect information (e.g. event date, attendees) about GWC events that GWC-Led Service Users are invited to or attend.

- **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.

- **User-Generated Content:**

We collect content created by GWC-Led Service Users as part of participation in the GWC-Led Services, including message boards, answers to curricular questions, project galleries, or in email.

- **Surveys and User Feedback:** Your responses to surveys or participation on panels, including tape recorded opportunities, that we, the GWC Research Team and/or research groups from partnering organizations or academic institutions ("Research Partners") might ask you to complete for research purposes and product improvement. These surveys and/or studies might ask you for your name and email as well as other free form and multiple-choice fields or questions.

- **Conduct and Safety Information:** If a GWC-Led Service User reports another user on the GWC-Led Service (e.g. such as through a "report a message" button) for conduct or safety issues, GWC collects the information provided in the report (e.g. the username, the content being reported, the reason for reporting) to investigate the report (e.g. assess and address offensive content), and to keep the platform safe and secure.

- **Contact Information and Correspondence with GWC:** As a GWC-Led Service User, you may choose to provide us with your Personal Information, such as your name, email address, and telephone number, when asking a general question, communicating with customer support services, participating in a video testimonial about the GWC-Led Services, or choosing to participate in a feedback session or research effort. 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, the email address and phone numbers collected are not further used to market to the individual beyond providing the services requested or responding to the requests.

For more detail on the information collected from each user type within these categories and the specific GWC-Led Services please see below and our GWC-Led Service data collection chart here.

Detailed Personal Information collected by GWC

We have also prepared this chart which describes in detail the categories of Personal Information we collect from each GWC-Led Service User type, 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 such Personal Information for a business purpose.

Basically, We ask you for different types of information based on your GWC-Led Services User type and and which GWC features you use (e.g., sending a message between GWC-Led Service Users) We have also prepared this chart of the Personal Information we collect, how we use it, and where it is stored.

Information We Collect Automatically

When you use the GWC-Led Services, we (or our Third Party Service Providers) may use various technologies that automatically record or collect certain information, including Personal Information,

from your browser or your device about the GWC-Led Services you use and how you use them. This information is necessary for the adequate performance of the contract between you and us, to enable us to comply with legal obligations and given our legitimate interest in being able to provide and improve the GWC-Led Services. For example, this could include the frequency and duration of your visits to GWC (similar to TV ratings that indicate how many people watched a particular show). If you use GWC on different devices, we may link the information we collect from those different devices to help us provide a consistent GWC-Led Service across your different devices. 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 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 in connection with advertising of our service that may appear on other sites or in connection with advertising their products outside of our GWC-Led Service (e.g., if you view an embedded YouTube video player on our GWC-Led Service, YouTube may place cookies or similar technologies on your browser when you play the video off our site). We don't allow these third-parties to advertise directly on our GWC-Led Service (i.e. such as when an advertiser would bid to place an advertisement directly on a platform such as Facebook), but we may serve contextually relevant advertising (which means not using Personal Information) for Third Party products and services ourselves that we believe may be of interest to you (e.g., our Summer Immersion Program). 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.

- **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.

  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 GWC-Led Services, administer the GWC-Led Services, tailor the GWC-Led Services for you, and to help the GWC-Led Services 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 GWC-Led Services. 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 GWC-Led Service is performing, improve GWC for you on your particular device, and send you push notifications if you've opted in to receive them.

- **Server log information:** Like most online services, when you use our GWC-Led Service 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 GWC-Led Service, such as your activity on the GWC-Led Service (including product event data used to track progress or user activity), and the frequency and duration of your visits to the GWC-Led Service (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 are most (or least!) popular, and to send emails to encourage the GWC-Led Service User to finish an activity or start the next activity. 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 GWC-Led Services based on usage pattern data and for analytics. We automatically delete IP Addresses tracked in server logs after six months.

- **Location information:** When you use our GWC-Led Services, 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 GWC-Led Service Users, 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 provide the GWC-Led Service. 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 GWC-Led Service 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.

- **Product events:** As users interact with the product, we collect product events about how the product is 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 GWC-Led Services, including for internal analysis on product usage and quality. We may also use it to track progress in the GWC-Led Services, and for sending push or email notifications to GWC-Led Service User's device to encourage them to take certain actions in the GWC GWC-Led Service. 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.

Basically,

We collect some information from you automatically (and additionally use Cookies and other similar technologies to collect information) so that we know when things go wrong, or to help us understand what parts of GWC need some improvement. If we need to request street-level ("precise") geolocation data from you, we'll ask for your explicit, opt-in consent. We never request precise geolocation data from minors under 18.

Information Received from Third Party Sources

We may also obtain information, including Personal Information, from Third Party Service Providers and/or Research Partners, 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. survey 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 Privacy Policy. If we directly combine information we receive from other third-parties with Personal Information that we collect through the GWC-Led Services, we will treat the combined information as Personal Information and handle it in accordance with this 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 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, and the third parties with whom we disclose Personal Information for a business purpose.

Basically,

We may collect some information from Third Party sources when we send questionnaires to teachers and parents. That information will be handled under this Privacy Policy. Please see this chart with 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, 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 your, or your 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 GWC-Led Service Users between the ages of 13 and 17 ("GWC-Led Service Minor Users") is never used for Behaviorally-Targeted Advertising to GWC-Led Service Users (by us or third-parties). We may serve Contextually Relevant Advertising (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., internship opportunities). 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. More specifically, the information collected from GWC-Led Service Users is used for the following purposes:

- ***Power Our GWC-Led Services:*** This includes, operating, providing, enhancing and improving the GWC-Led Services, for example, by developing new products and features, and personalizing or customizing the GWC-Led Services for you.
- ***Provide Internal Analytics and Reviews:*** This includes using for internal audits and review, for analyzing how the GWC-Led Services are used, providing statistics about the usage levels of the GWC-Led Services, and diagnosing service or technical problems.
- ***Process Your Transactions*:** 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).
- ***Communicate with You*:** To send you information about features on our GWC-Led Services or changes to our policies and GWC-Led Services or communicate with you about your use of the GWC-Led Services, your account, or transactions with us. 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 GWC-Led Services (including notifying you of data privacy incidents). Additionally, we may provide Users 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. Personal Information is never shared with third parties in connection with this unless you have opted-in. 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 GWC-Led Services.
- ***Security and Fraud Prevention*:** Most crucially, to protect our community by making sure the GWC-Led Service remains safe and secure, such as by detecting, investigating and preventing activities that may violate our policies or be illegal.

- ***Comply with Law*:** To comply with applicable law – for example, to satisfy tax or reporting obligations, or to comply with a lawful governmental request or notify you of data privacy incidents when legally required.

We use automatically collected information (described in the "Information We Collect Automatically" section above) to provide and support our GWC-Led Service, and for the additional uses described in this section of this Privacy Policy. To learn more about how we use your information for personalization and tracking, please see the Online Tracking Technologies Policy.

When acting as a Controller, we process this information given our legitimate interest in improving and protecting the GWC-Led Service and our GWC-Led Service Users' experience with it, taking into consideration your interests, rights, and expectations. Depending on the circumstances, we may also rely on your consent or the fact that the processing is necessary for the adequate performance of the contract with you, to protect your vital interest or those of other persons or the GWC-Led Service, 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 GWC-Led Services that may be of your interest. 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 GWC-Led Services 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 Privacy Policy.

Automated Decision Making
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").

Basically,

GWC doesn't Sell or rent your information to third-parties, we don't permit Third Party advertising on the GWC-Led Services, and Personal Information collected from GWC-Led Service Minor Users is never used for Behaviorally-targeted advertising to GWC-Led Service Minor Users. We use your information to provide and personalize the GWC-Led Services to you, optimize and improve our GWC-Led Services, communicate with you about our GWC-Led Services, and for security and safety reasons. We may also use the information provided by GWC-Led Service Users to provide information about events, announcements, offers, promotions, products, including Third Party products, and GWC Services we think will be of interest to you.

WILL GWC SHARE ANY INFORMATION IT COLLECTS?

GWC does not Sell or rent your Personal Information to any Third Party for any purpose - including for advertising or marketing purposes. Third Party advertising is not permitted on areas where GWC-Led

Service Users are required to log in to GWC HQ and Personal Information collected in the GWC-Led Services are never used for behaviorally-targeted advertising to GWC-Led Service Minor Users (by us or third-parties). Furthermore, we do not disclose Personal Information with any third-parties except in the limited circumstances described in this Privacy Policy and as set forth below:

- **Other Users You Share and Communicate with on GWC Clubs:** No profiles of GWC-Led Service Users within GWC HQ Accounts are made available to the general public through our GWC-Led Service. Furthermore, GWC-Led Service Minor Users cannot share their account information, profile, projects, or answers to curricular questions with anyone on GWC HQ outside of other logged in GWC-Led Service Users and/or GWC Personnel.

  Please keep in mind that information (including Personal Information) or content that you voluntarily disclose to others - including to other GWC users you interact with through the GWC-Led Services (such as messages you might send other GWC-Led Service Users or GWC Personnel you collaborate with) - can be viewed, copied, stored, and used by the people you share it with. We cannot control the actions of people with whom you choose to share information and we are not responsible for the collection, use, or disclosure of such information or content by others. We, therefore, encourage you only to post information that you are sure you want to be accessible to anyone.

- **Third Party Integrations on our GWC-Led Services:** When you as a GWC-Led Services User use Third Party apps, websites, or other services that use, or are integrated with, our GWC-Led Service, 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 GWC-Led Services.

- **Service providers:** We do work with vendors, GWC-Led Service Third Party Service Providers, and other partners to help us provide the GWC-Led Services by performing tasks on our behalf. These Third Party Service Providers may be located inside or outside of the European Economic Area ("EEA"). 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 Privacy Policy. Please see here for a list of the third-parties we work with to provide the GWC-Led Services.

- **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 GWC-Led Service Minor Users). 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 provider. You may also choose to contact us here if you would like to opt-out of any such sharing.

- **Analytics Services:** We use analytics services, to help us understand and improve how the GWC-Led Service is being used. These services may collect, store and use information in order to help us understand things like how often you use the GWC-Led Service, the events that occur within the application, usage, performance data, and from where the application was downloaded. 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 GWC-Led Service is 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 Privacy Policy.

- **Change of control:** This 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.

Basically,

GWC doesn't sell or rent your Personal Information to any third-parties. We believe your information is yours, and you should own it - we think that's the right way to operate. We share some information with Third Party Service Providers who help us provide you with the GWC-Led Services – like companies that help us send emails, for example, or if we have to comply with the law. Additionally, you may choose to share information with other users of the GWC-Led Services or to third-parties that are integrated on our GWC-Led Services.

And, if GWC is ever acquired or goes out of business, our commitments don't change: we still won't sell or rent your Personal Information to anyone. Your Personal Information will continue to be protected by this policy, and any company that acquires GWC will have to abide by this policy unless you give consent to a new policy.

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. Where you have password-protected access to an account or certain parts of the GWC-Led Services, you are responsible for keeping this password secure at all times. You should not share your password with anyone. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or mobile device and browser by signing off after you have finished accessing your account. If you think that any of your accounts have been compromised you should change your account credentials with us. In particular make sure any compromised account can't access GWC. We will never email you to ask for

your password or other account login information. If you receive such an email, please send it to us so we can investigate.

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.
- We ensure passwords are stored and transferred securely using encryption and salted hashing.
- The GWC-Led Service is 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 delete inactive GWC-Led Service Minor Accounts after a specific period of time, as per our retention policy, described in the "How Long Does GWC Keep Information About Me" section.
- Voluntary Vulnerability Reporting (No Bug Bounty). Effective November 17, 2025, Girls Who Code no longer offers any form of bug bounty or monetary compensation for vulnerability reports. If you believe you have identified a potential security or privacy issue affecting our services, you may voluntarily report it to privacy@girlswhocode.com, with the understanding that you are doing so without expectation of payment, reward, or reimbursement. Girls Who Code may use the information you provide to investigate, remediate, and communicate about the issue as we deem appropriate. We ask that, in submitting any report, you do not access, modify, or exfiltrate data that does not belong to you; do not disrupt or degrade our services; and comply with all applicable laws while conducting any testing.
- 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 GWC-Led Service, 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.

Basically,

The security of your information is important to us, and we take it very seriously. We're always adding safeguards to ensure the safety and security of GWC and our community of Users and parents. You can help us out by keeping your password secret! When you enter Personal Information anywhere on the GWC-Led Service, we encrypt the transmission of that information using SSL by default. GWC's databases where we store your Personal Information are encrypted at rest, which converts all Personal Information stored in the database to an unintelligible form. Please see our Security Whitepaper for more details.

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.

You can read more about GWC's data retention periods, including how long it takes us to delete your information here.

We store your Personal Information for as long as it is necessary to provide the GWC-Led Services to you and others, including those described above. 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). The time periods for which we retain your Personal Information depend on the purposes for which we use it. Personal information associated with your account will be kept until your account is deleted, unless we no longer need the data to provide products and services, in which case we will delete prior to you deleting your account. Please see our Information Transparency Chart for more specific information on retention periods of specific Personal Information.

You can, of course, delete your account at any time in accordance with relevant legal and compliance obligations. Please note that we may also have to retain some information after your account is deleted or closed, to comply with legal obligations, to protect the safety and security of our community or our GWC-Led Service, or to prevent abuse of our Terms. For more details, please read "What happens when I delete my account?" in our FAQs.

Additional examples of when we may need to retain Personal Information after your account is deleted:

- Our contractual or business relationship with you.

- Financial recordkeeping –if you make a payment to us (e.g. for Premium Features) we are often required to retain this information for a longer period of time for purposes of account, dispute investigation and resolution, and compliance with tax, anti-money laundering, and other financial regulations.
- Direct communication with us – if you have directly communicated with us, through a customer support channel, feedback form, or bug report, we may retain reasonable records of those communications.

For more details, please read "What happens when I delete my account?" in our FAQs.

Even if you delete your account, keep in mind that the deletion by our third party sources may not be immediate and the deleted information may persist in backup copies for a reasonable period of time. We may retain de-identified information for as long as we deem appropriate or as otherwise allowed by law.

Basically,

We keep User Personal Information until your account is deleted, or until we no longer need it to provide you with the GWC-Led Service. Please see our Information Transparency Chart for more specific information on retention periods for specific Personal Information. You can, of course, delete your account at any time. For more details, please read "What happens when I delete my account?". Even if you delete your account, keep in mind that the deletion by our Third Party Service Providers may not be immediate and that the deleted information may persist in backup copies for a reasonable period of time. We may retain de-identified information for as long as we deem appropriate.

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 (within the US and the EU through GDPR) 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 or account from GWC
- Object or restrict processing
- Withdraw Consent
- 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.

Basically, At GWC, we believe that more transparency is better. We try to give you control, with easy settings and options, so that you can make good choices when it comes to your information and how it is used. We also set forth the ways in which you can exercise your rights to access, correct, and delete your Personal Information as well as your right to take information out of GWC and object or withdraw consent. If you are a California resident, you may have additional rights as set forth under 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 from the same email used to create your GWC account. 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. If you are an employee of a GWC customer, we recommend you contact your employer's system administrator for assistance in correcting or updating your information.

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.

Basically,

To exercise your rights, please send an email to privacy@girlswhocode.com from the same email used to create your GWC account. We will respond to all legitimate requests within one month unless otherwise allowed or required by law, and will contact you if we need additional information.

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 or delete it, unless we have to keep that information for legitimate business purposes (e.g., we need at least an email address for your account if you maintain an account with us) or legal purposes. You have the right to correct inaccurate or incomplete Personal Information concerning you (and which you cannot update yourself within your GWC HQ Account).

- Managing Your Information: If you have registered for an account on GWC, you may update, correct, or delete some of your profile information or your preferences at any time by logging into your GWC HQ Account and accessing your account settings page. You may have to verify your identity before you can do that. You may also, at any time, update, correct, or delete certain Personal Information that you have provided to us as set forth above.
- Accessing Your Information: Upon request, GWC will provide you with information about whether we hold any of your Personal Information, and, If you are a GWC-Led Service User of GWC, you may request access to all 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.

Basically,

You have certain rights to access, update and correct your Personal Information. You can always access and manage your Personal Information through your GWC account.

How Can I Delete My Personal Information or Account?

We hope you love using GWC now and always. However, if for some reason you ever want to delete your GWC HQ Account you can do that at any time by contacting us as set forth above. You may also delete your account by logging into your GWC HQ Account and accessing your account settings page.

When you delete your GWC HQ Account, we delete your profile information and any other content you provide in your profile (such as your username, password, email address, and profile photos) and the additional content or personal information uploaded for use will be deleted as set forth in our FAQ. 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. For more details, please read our FAQ.

We aim to maintain our GWC-Led Services in a manner that protects Personal Information from accidental or malicious destruction. Because of this, even after you update or delete Personal Information you have provided us from our GWC-Led Services, 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. For example, if we suspend a GWC HQ Account for fraud or safety reasons, we may retain certain information from that account to prevent that user from opening a new account in the future. Also, we may retain and use your Personal Information to the extent necessary to comply with our legal obligations.

If you are a California resident, we may also retain Personal Information as set forth under the CCPA.

Basically, You can always delete your GWC HQ Account by visiting your account settings, or simply by contacting us at privacy@girlswhocode.com from the email used to create your GWC HQ Account or by following the instructions here once you are signed in to your GWC HQ Account. For more details on what happens when you delete your account, click here.

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 changing your account settings or 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 GWC-Led Service Users 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.

Basically,

You have the right to withdraw consent for the collection of your Personal Information, and also opt-out of marketing communications from us. You may also be able to limit the ways in which GWC uses your Personal Information. Email us at privacy@girlswhocode.com from the email used to create your GWC HQ Account and we'll help you right away.

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

Basically,

If you're located in the EU you can contact GWC's appointed local representative in the EU, European Data Protection Office (EDPO) using their online request form. If you are located in the UK, you can contact GWC's appointed local representative in the UK, EDPO using their online request form.

WHAT COMMUNICATIONS WILL I RECEIVE FROM GWC?

If you registered on GWC HQ, provided an email or phone number to us, or otherwise opted-in to receive communications from us, you consent to us sending you messages and updates regarding your GWC HQ Account and the GWC-Led Services, including privacy and security notices, updates regarding the GWC-Led Service, 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. If you have an account with us, we'll 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.

If you invite another person to join you on GWC, by providing their email address or phone number, GWC may send an invitation on your behalf to the individual via the email or phone number you provided. Prior to providing GWC with email addresses or phone numbers of another person, you must ensure you have obtained consent from the person. The invitation (and any invitation reminders) may be sent via email or SMS/MMS text message. If they would prefer not to receive our communications, they may opt-out using the "Unsubscribe" or "STOP" instructions contained in those communications. If they need help, they can reply "HELP". You are consenting to GWC (on your behalf) sending these informational text messages.

You can always unsubscribe from receiving any of our 1) marketing emails or other marketing communications whenever you'd like by clicking the "Unsubscribe" link at the bottom of the email or 2) marketing SMS texts by replying or texting 'STOP'. For help, you can also reply "HELP".

You can further indicate your preferences by contacting us using the information in the "How can I contact GWC with questions?" section below. Please note that opting out of marketing communications does not opt you out of receiving important business communications related to your current relationship with us, such as communications about your subscriptions or event registrations, service announcements or security information.

If you reside in Canada or other jurisdictions that require opt-in consent, you may have also opted in to receive future promotional electronic communications from us. If you opt-in to receive such communications, we may use the information to: communicate with you regarding our products, services and promotions; provide you with other information that you request; and/or improve our product and service offerings. You will always have the opportunity to "unsubscribe" from us at any time by clicking the "Unsubscribe" link at the bottom of the email. We provide an ongoing opportunity to unsubscribe or opt-out of contact by us as set out on our website or by contacting us by email at privacy@girlswhocode.com , or as otherwise described in our messages to you.

Basically,

From time to time, we may send you useful messages about updates or new features. You can always opt-out of these messages if you'd rather we didn't contact you.

Third Party AUTHENTICATION SERVICES

If you decide to register for a GWC HQ Account through an authentication service, such as Google Login ("Authentication Service"), GWC may collect Personal Information that is already associated with your account connected to the Authentication Service (e.g. name, email address and photo). If you choose to provide such information during registration, you are giving GWC the permission to store and use such information already associated with your Authentication Service in a manner consistent with this Privacy Policy. The current list of Authentication Services that we use is listed here. You may revoke GWC's access to your account on any Authentication Service at any time by updating the appropriate settings in the account preferences of the respective Authentication

Service. You should check your privacy settings on each Authentication Service to understand and change the information sent to us through each Authentication Service. Please review each Authentication Service's terms of use and privacy policies carefully before using their services and connecting to our GWC-Led Service. Your use of Authentication Service is subject to the applicable Third Party terms and privacy policies. Please see here for more information on what we collect through the use of Authentication Services and how we use that information.

Basically, We may allow for GWC-Led Service Users to register on our GWC-Led Service through an Authentication Service (e.g. with Google Login). If you choose to do so, we may collect Personal Information that is already associated with your connected Authentication Service, and you give us permission to use and store this information consistent with this Privacy Policy. You can revoke our access to your account on this Authentication Service at any time by updating the appropriate settings in the account settings of the Authentication Service.

Third Party SERVICES

The https://girlswhocode.zendesk.com/hc/en-us/articles/31786493102235-What-are-the-GWC-Led-Services-Privacy-Key-Terms#h_01JEW159ZKCXN981CR4A1DR80F may contain links to websites, applications, services, or other content provided by third-parties (e.g., video players). In addition, GWC Community Partners may choose to place Third Party links to outside resources in materials shared with GWC-Led Service Users, including links to websites, applications, services, or other content ("Community Partner Third Party Links") within their use of the GWC-Led Service (e.g. a GWC-Led Services User using a third party coding product to complete a GWC activity). GWC does not control or monitor any such Community Partner Third Party Links and does not encourage GWC-Led Service Users to click on Community Partner Third Party Links through the product. Separately, the GWC-Led Services may require you to utilize Third Party Platform Providers in order to complete a coding project. Your use of these features 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's policies governing privacy and security and is not covered by our 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 GWC-Led Services, but may appear to still be playing on our GWC-Led Services. 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.

Basically,

Links to other websites and services as well as embedded video players may be found within the GWC-Led Services— this Privacy Policy does not apply to those.

IS GWC A CONTROLLER?

GWC processes Personal Information both as a Processor and as a Controller, as defined in the GDPR and/or used under the CCPA or other applicable privacy laws.

GWC will generally be the Controller when GWC-Led Service Users enter Personal Information directly into our GWC-Led Services when registering for a GWC HQ Account.

Further details are outlined in the "What information does GWC collect?" section.

WHAT IF I'M NOT LOCATED IN THE U.S.?

GWC is hosted and operated in the United States. If you use the GWC-Led Services 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 will be transferring your Personal Information outside of those jurisdictions to the United States. The Personal Information we or our third party sources 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 Privacy Policy or in accordance with applicable laws.

Additionally, where we transfer, store and process your Personal Information outside 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.

By using the GWC-Led Services, 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 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 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.

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 ("U.S. 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 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 ("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 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.

Basically,

If you are a U.S. resident with an applicable U.S. State Data Protection Law, such as, the CCPA, VCDPA, CPA or UCPA, these laws afford you certain rights of access, deletion and data portability - which we also extend to all users. 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. We will not discriminate against you for exercising any of your rights under the applicable U.S. State Data Protection Laws. Additionally, if you are a California resident you are entitled to certain disclosures regarding our collection and use of your Personal Information over the past twelve (12) months - 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 and the third parties with whom we share or disclose Personal Information for a business purpose.

Sensitive Personal Information

In certain jurisdictions, you have the right to limit the use or disclosure of your sensitive Personal Information to certain allowed activities under applicable U.S. State Data Protection Laws. Sensitive Personal Information is a subset of Personal Information and is defined differently under applicable U.S. State Data Protection Laws. Please see our Information Transparency Chart for a list of any sensitive Personal Information that we may collect, use and disclose based on the applicable U.S. State Data Protection Laws. If you are a California resident, we do not use or disclose your sensitive Personal Information for purposes other than those allowed under the CCPA, Section 7027(m).

We Do Not Sell Your Personal Information

As stated throughout this Privacy Policy, GWC does not sell Personal Information of any GWC-Led Services User to any Third Party for any purpose - including for advertising or marketing purposes.

Please note that a sale does not include when we disclose your Personal Information at your direction, or when otherwise permitted under applicable U.S. State Data Protection Laws.

California Privacy Disclosures

In addition to the disclosures listed above in this U.S. State Data Privacy Section, please see the following California specific disclosures.

The CCPA requires a description of data practices using specific categories and specific types of required disclosures. Please see our Notice of Collection which organizes this information. At or before the time of collection, you have a right to receive notice of our practices, including the categories of Personal Information, the purposes for which such information is collected or used, whether such information is sold or shared, and how long such information is retained. You can find those details by clicking on the Notice of Collection.

Do Not Share My Personal Information

GWC does not share its GWC-Led Service Users' Personal Information to a third party for cross-context behavioral advertising, as those terms are defined under the CCPA. Furthermore, we do not share or disclose Personal Information with any third-parties except in the limited circumstances described in this Privacy Policy and as set forth here.

If GWC in the future does share or sell any Personal Information of a GWC-Led Services User located in California, we will provide the CCPA required "Do Not Sell or Share my Personal Information" link in the footer of our website as well as honoring an Opt-Out Preference Signal as set forth below. GWC will not share or sell the Personal Information of consumers under 16 years of age.

Basically,

GWC does not sell Personal Information of any GWC-Led Services User to any Third Party for any purpose - including for advertising or marketing purposes. Currently, GWC does not share its users Personal Information to a third party for cross-context behavioral advertising. If GWC in the future does share or sell any Personal Information of a GWC-Led Services User located in California, we will provide the CCPA required "Do Not Sell or Share my Personal Information" link in the footer of our website as well as honoring an Opt-Out Preference Signal as set forth below. GWC will not share or sell the Personal Information of consumers under 16 years of age. For a list of Third Party GWC-Led Service providers we disclose information to, please see here.

Do Not Track or Opt-Out Preference Signal

Do Not Track ("DNT") is a privacy preference that GWC-Led Services 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 GWC does not respond to these DNT signals. There are different (from DNT) opt-out preference signals set forth under the CCPA ("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.

Third-parties that have content embedded on the GWC-Led Services, such as a social feature, or an embedded video player, may set Cookies on a user's browser and/or obtain information about the fact that a web browser visited the Service from a certain IP Address. Third-parties cannot collect any other personally identifiable information from the GWC-Led Service unless you provide it to them directly.

Basically,

GWC does not respond to DNT signals as there is lack of industry standard and the working group to resolve these issues is also now closed. However, if you are a user based in California, GWC will respond to Opt-Out Preference or GPC Signals as those terms and signals are defined under the CPRA. This signal will apply to the browser and a consumer can use an opt-out preference signal by following the instructions here.

Notice for Minors (Users under 18)

If you are under the age of 18, you are entitled to request removal of content or information you (the minor) have publicly posted on our GWC-Led Services. GWC-Led Services Minor Users have the option to delete Personal Information associated with their GWC HQ Account, content that they upload through their GWC HQ Account, or content they may share with other GWC-Led Service Users through their GWC HQ Account. If you are a GWC-Led Services Minor User (or their parent) and would like to delete Personal Information associated with your GWC HQ Account please follow the directions set forth in the "GWC's commitments to providing Transparency and Your Rights" section. Although we offer deletion capabilities on our GWC-Led Services, you should be aware that the removal of content may not ensure complete or comprehensive removal of that content or information posted through the GWC-Led Services, as there may be De-identified or recoverable elements of your content or information on our servers in some form. Additionally, we will not remove content or information that we may be required to retain under applicable laws.

Basically,

If you are a GWC-Led Services Minor User or parent of a minor, you may delete information per the "How can I delete my account?" section.

"Shine the Light" Law

Pursuant to California Civil Code Section 1798.83(c)(2), GWC does not share Personal Information with third parties for their own direct marketing purposes unless you affirmatively agree to such disclosure. California customers can receive more information about our compliance with this law or to make a request under California Civil Code Section 1798.83 by sending us an email

at privacy@girlswhocode.com or by writing to us as set forth in "How Can I Contact GWC with Questions" section below.

HOW WILL GWC NOTIFY ME OF CHANGES TO THIS POLICY?

We may occasionally update this GWC-Led Services 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. Any updates will be effective upon posting. We won't reduce your rights under this GWC-Led Services Privacy Policy without your explicit consent. If we make any significant changes, we'll provide prominent notice by posting a notice on the GWC-Led Services 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 GWC-Led Services Privacy Policy from time to time, to stay informed about our collection, use, and disclosure of Personal Information through the GWC-Led Services. If you don't agree with any changes to the GWC-Led Services Privacy Policy, you may terminate your GWC-Led Services Account (although we'll be sad to see you go!). By continuing to use the GWC-Led Services after the revised GWC-Led Services Privacy Policy has become effective, you acknowledge that you accept and agree to the current version of the GWC-Led Services Privacy Policy.

We reserve the right to notify you of updates to our GWC-Led Services 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 GWC-Led Services, and you are still responsible for reading and understanding them.

Basically, We will let you know by email and/or on our website when we make significant changes to our GWC-Led Services Privacy Policy.

HOW CAN I CONTACT GWC WITH QUESTIONS?

If you have any questions or concerns about this GWC-Led Services 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

Basically,

Questions? We're here to help! Email us any time at privacy@girlswhocode.com.

FURTHER PRIVACY AND SECURITY RESOURCES

For any GWC-Led Service Users or parents seeking more information on how we provide safety on GWC, we provide privacy and security related materials on our GWC-Led Services Privacy Center as well as on our Security Whitepaper.

For Key Terms that are used in this GWC-Led Services Privacy Policy and our GWC-Led Services Terms of Service, please visit this GWC-Led Service Key Terms FAQ.

For our Online Tracking Technologies Policy, please see here.

For our chart that details the Personal Information we collect, how we use it, and where it is stored, please see here.

Basically,

If you'd like some more safety and privacy resources, please see our Security Whitepaper. For definitions of Key Terms please visit here, and for our GWC-Led Services Terms of Service, visit here.