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Girls Who Code Clubs Privacy Policy Highlights

Last updated: March 27, 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. We offer a Student Data Privacy Addendum, an agreement we enter into with schools or districts that further describes our duties, responsibilities, and commitments with respect to Student Data that we collect or receive.

This Clubs Privacy Policy applies solely to the Girls Who Code Clubs Services (defined below) and does not apply to the informational website located at https://girlswhocode.com (the "Girls Who Code Website") or the non-club, direct programming and services that we offer at https://hq.girlswhocode.com ("Direct Program Services"). The Girls Who Code Website Privacy Policy and Direct Program Services Privacy Policy is located here.

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.

  We also have Online Tracking Technologies Policy. You can also find more details below.

- **How We Use the Information We Collect:** We use the Personal Information we collect from Club Student Users (or about Club Student Users from Teacher Facilitators, and/or parents) to provide and improve the Club Service, for educational purposes, security, and safety purposes, or as allowed by law. We will not require children to provide more Personal Information than is reasonably necessary to participate in the Club Service. See here for more information on our use of information collected from minors and children using the Club Service not connected to a school or classroom ("Outside School Club Child User" (if under 13) and "Outside School Minor User" if between the ages of 13-17) (together, "Outside School Learner User(s)"), including for educational and other learning activities at home (e.g. Code at Home, other Direct Programs). For additional information regarding our use of information collected from Teacher Facilitators, parents, and School Club administrators ("School Club Administrator"), see here.

- **Data Retention:**

  School Accounts
  We will not retain Club Student User Personal Information for any longer than is necessary for Educational Purposes and legal obligations, or to provide the Service for which we receive or collect the Club Student User Personal Information. We delete Club Student Users' Accounts if they're inactive for more than twelve months. Some content within a Club Student Account utilized in school or for Educational Purposes connected to a school or classroom ("Club Student Account") will be kept after deletion of the account for school legal compliance reasons (e.g., maintenance of "education records" under the Family Educational Rights and Privacy Act (FERPA) or "Student Data" under state student privacy laws or equivalent laws in international jurisdictions) and will not be deleted until we receive direction from the school. This can include content uploaded by a Club Student User, Teacher Facilitator, School Club Administrator, or parent.

  Outside School Accounts
  We store child and minor user Personal Information, including content uploaded by Outside School Club Child Accounts and Outside School Minor Accounts, for as long as it is necessary to provide products and Clubs Services to you and others. For Outside School Club Child Users and Outside School Minor Users, Personal Information associated with your account will be kept until your account is deleted or until we no longer need the data to provide the Service, whichever occurs first. Additionally, some data is deleted or anonymized after a set period of time. For additional information on our retention periods, see here.

- **What Children's Information is Shown Publicly?** Within the Clubs Service accounts, No Club Student's Account, Outside School Club Child's Account, or Outside School Minor's Account profile is made available or visible to the general public through GWC. Additionally, the "Project

Gallery" associated with any Clubs account is not made available or visible to the general public through GWC (only signed in GWC users may view the Project Gallery). For a list of what logged in Club Student Users, Outside School Club Child User's and Outside School Minor User's information can be viewed within their Club accounts by other logged-in GWC users, please see our FAQ.

- **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 the Clubs Privacy Policy, such as with a limited set of third party Club Service Providers necessary to provide or develop our Clubs Services (such as database hosting) or as required by law, and we will be transparent about who these Clubs Service Providers are.

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

- **We never use Club Student User or Outside School Learner User data for behaviorally targeted or third-party advertising:** Information collected from Club Student Users, Outside School Club Child Users and Outside School Minor Users (including Personal Information and information collected automatically) for Clubs is never used or disclosed for Third-Party Advertising. We also do not place any third-party advertisements in Club Student User or Outside School Learner User logged-in areas of the Club Service. Additionally, Personal Information collected from Club Student Users, Outside School Minor Users, and Outside School Club Child Users is never used for Behaviorally-Targeted Advertising to Club Student Users, Outside School Minor Users, or Outside School Club Child Users by us or any third-party. We may present contextually relevant educational content for Clubs (not using Club Student User, Outside School Minor User, or Outside School Club Child User Personal Information) for either our own products and programs and events or third-party products and Club Services ourselves that we believe may be of interest to a Club Student User, Outside School Minor User, or Outside School Club Child User (e.g., our co-created content for GWC "CS Ed Week" with CSedweek.org).

- **You own your data:** We don't own any content or information you provide or we receive - you (Club Student Users, Outside School Learner Users, parents, and/or schools) 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 tell you about what data we collect, why we collect it, and how it's used, retained and shared with others. 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 Clubs Service 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:** We support access to, correction, and deletion of children's Personal Information by the Club Student User or their parent or legal guardian, by assisting the school in meeting its requirements for access, correction, and deletion or by responding to requests we receive from schools. Additionally, we support access to, correction, and deletion of Outside School Club Learner's Personal Information by either 1) directly responding to requests from parents or legal guardians when the information is collected from an Outside School Club Child User account, and GWC obtains the consent directly from the parent or legal guardian; 2) directly responding to the Outside School Minor User when the information is collected from an Outside School Minor User. Where we are directly responding to requests from parents or legal guardians, the school would not be acting as the agent of the parent and consenting - such as when they are using GWC not connected to a school. Teacher Facilitators, parents, School Club Administrators, and other users can contact us at privacy@girlswhocode.com from the email used to create your 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 Clubs Privacy Policy

Last updated: March 25, 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. This Privacy Policy governs activities within a Girls Who Code Club ("Club" or "Clubs").

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 one of the Girls Who Code Clubs through https://clubs-hq@girlswhocode.com (the "Clubs HQ Platform"), or any Club Services that link to this Club 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 "Club 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 Teacher Facilitator survey collected through Alchemer.

This Privacy Policy applies solely to the GWC Club Services and does not apply to the informational website located at https://girlswhocode.com (the "GWC Website") nor does it apply to any other Girls Who Code Direct Program Services or products offered by GWC ("GWC Direct Program Services"). The GWC Website Privacy Policy and GWC Direct Program Services Privacy Policy is located 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, email campaigns, push or in-app notifications, or YouTube videos) on the Club 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 Club 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, and Pixel Tags, read about these key terms.

For Club Student Users and Outside School Learner Users, we have 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 visit

> 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 Club Services . This Privacy Policy applies solely to the GWC Club Services and does not apply to the informational GWC Website or the GWC Direct Program Services and Products - you can find the GWC Website Privacy Policy here. Other companies that GWC doesn't own or control will have their own privacy policies, and you should read them, too!

the GWC Privacy Center to learn more about how we protect your privacy, or send us an email at privacy@girlswhocode.com.

ACKNOWLEDGMENT AND CONSENT

By using the Club Service, you acknowledge that you accept and agree to this Club Privacy Policy. By visiting the GWC Clubs HQ Platform, or using our Club Services in any manner, you acknowledge that you accept the terms, practices and policies described in this Club 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 Club

Services . Your use of our Club Services is at all times subject to our Terms of Use (as updated from time to time (the "Terms")), which incorporates this Club Privacy Policy, as well as the Clubs Participation Agreement or District Service Agreement, as applicable. Any capitalized terms we use in this Club Privacy Policy without defining them have the definitions given to them in the Terms.

Basically,

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

WHAT IS GIRLS WHO CODE CLUBS HQ?

Girls Who Code Clubs HQ "Clubs HQ" is a web application with lightweight learning management tools connected to our custom curriculum resources. GWC Clubs HQ accounts for a Club may be started by an adult sponsoring a Club and will give that adult access to the resources and Club HQ features within Clubs HQ. For School Clubs, a Club may be started by a teacher or other approved school staff member (a "Teacher Facilitator"). For Outside School Clubs, any User over 18 years of age can apply to start or facilitate a Club (an "Outside School Club Facilitator").

School Clubs

For clubs that take place in School ("School Clubs"), Teacher Facilitators can access the Girls Who Code curriculum resources and facilitation guides. They can view and edit their Club information on the Program Information page, and control whether any Clubs information is made visible on the Girls Who Code Locations Page. Teacher Facilitators may choose to enroll students in their School Club ("Club Student Users") so they can track Club Student Users' independent progress through the curriculum resources on the Progress page. Additionally, they can review and provide feedback on any Answers submitted by their Club Student Users. They can view their Club Student Users' submissions to the Project Gallery, choose to allow their Clubs Student Users' submissions to be viewable in the Project Gallery after review by Girls Who Code, and also explore other School Clubs' and Outside School Clubs projects in the Project Gallery. Teacher Facilitators can interact with Club Student Users by posting messages and replies using text or images to their School Club's private message board using the Messages feature, or coordinate a School Club meeting (in person or virtual) by creating an event for their School Club on the Calendar. They may choose to create digital Certificates of completion for their Club Student Users. Clubs HQ is also where Teacher Facilitators can access forms to receive Club Funds, opt into the GWC Challenge, Submit End of Program Feedback, and Renew their Club. Announcements from Girls Who Code about additional Girls Who Code opportunities or public events are visible to Teacher Facilitators on the Home Page or Calendar. Teacher Facilitators may add an avatar and short biography for their Club Student Users and fellow School Club facilitators to view.

Outside School Clubs

For Clubs that take place outside of a school (ex. a library or community center) ("Outside School Clubs") Outside School Club Facilitators can access the Girls Who Code curriculum resources and facilitation guides. They can view and edit their Outside School Club information on the Program

Information page and control whether any Clubs information is made visible on the Girls Who Code Locations Page. Outside School Club Facilitators may choose to enroll children (under 13) who wish to participate in the Club ("Outside School Club Child Users") or minors (between 13 and 17 years old) who wish to participate in the Club ("Outside School Minor Users") (collectively, "Outside School Learner Users") so they can track Outside School Learner Users' independent progress through the curriculum resources on the Progress page. Additionally, Outside School Club Facilitators can review and provide feedback on any Answers submitted by their Outside School Learner Users. They can view their Outside School Learner Users' submissions to the Project Gallery, choose to allow their Clubs Student Users' submissions to be viewable in the Project Gallery after review by Girls Who Code, and also explore other Outside School Clubs' and School Clubs projects in the Project Gallery. Outside School Club Facilitators can interact with Outside School Learner Users by posting messages and replies using text or images to their Outside School Clubs' private message board using the Messages feature, or coordinate an Outside School Club meeting (in person or virtual) by creating an event for their Outside School Club on the Calendar. They may choose to create digital Certificates of completion for their Outside School Learner Users. Clubs HQ is also where Outside School Club Facilitators can access forms to receive Club Funds, opt into the GWC Challenge, Submit End of Program Feedback, and Renew their Club. Announcements from Girls Who Code about additional Girls Who Code opportunities or public events are visible to Outside School Club Facilitators on the Home Page or Calendar. Outside School Club Facilitators may add an avatar and short biography for their Outside School Learner Users and fellow Outside School Club Facilitators to view.

Clubs and the GWC HQ Platform

Club Student Users and Outside School Learner Users can have their own account to independently access and complete the Girls Who Code Curriculum activities, including submitting Answers to curriculum prompts and sharing final projects in the Project Gallery.

- For School Clubs, on the Program Information page, Club Student Users can view important information about their School Club, such as their Teacher Facilitator 's name, email, and any upcoming School Club events. Club Student Users can interact with their Teacher Facilitators and other Club Student Users in their School Club by posting messages and replies using text or images on their School Club's private message board using the Messages feature. Club Student Users may add an avatar and short biography for their User profile for their Teacher Facilitator to see (the avatar may also be visible to other Clubs Users if the Teacher Facilitator allows for their Club Student Users to use messages (see Children's Privacy Policy). Club Student Users can create a Club Student Account at school as directed by their Teacher Facilitator, who represents to GWC that they have authority to act as the agent of the parent and consented on the parent's behalf for the Club Student User to use GWC for educational purposes.

- For Outside School Clubs, on the Program Information page, they can view important information about their Outside School Club, such as their Outside School Club Facilitator's name, email, and any upcoming Outside School Club events. Outside School Learner Users can interact with their Outside School Club Facilitators and other Outside School Learner Users in their Outside School Club by posting messages and replies using text or images on their Outside School Club's private message board using the Messages feature. Outside School Learner Users may add an avatar and short biography for their User profile for their Outside School Club Facilitators to see (the avatar may also be visible to other Clubs Users if the

Outside School Club Facilitator allows for their Outside School Learner Users to use messages (see Children's Privacy Policy)). Outside School Learner Users can create an Outside School Learner Account as directed by their Outside School Club Facilitator, depending on their age:

- Outside School Club Child Users, who are under thirteen (13), will require a parent to create their account on GWC Clubs HQ, and provide parent consent.

- Outside School Minor Users, who are between the ages of thirteen (13) and seventeen (17), may create an Outside School Minor Account as directed by their Outside School Club Facilitator.

Parents can choose to be a part of their child's Girls Who Code Clubs HQ experience by creating a linked parent-child account. Parents of Outside School Club Child Users must create a club parent account and provide consent before adding their child's information to create an Outside School Club Child Account and enrolling their child in the Club. A parent can access a Program Preview in their club parent account and can access their child's account by switching to the child profile in the user menu. The parent can view all activity in their child's account (see above).

A Club Signatory also plays a meaningful role on Clubs HQ.

- For School Clubs, a Teacher Facilitator or a School Club Administrator can also serve as a Club Signatory for their School Clubs (depending on approval form their school or district). Or a third party, adult volunteer can begin the application process for a School Club even if they will not be the one facilitating the School Club. The Club Signatory is responsible for signing either a Participation Agreement or District Service Agreement (as applicable) as a prerequisite to creating a Club. Club Signatories can access a view-only version of the curriculum and view important Club details on the Program Info page (for their School Club: Teacher Facilitator name and email, number of enrolled Club Student Users, and any upcoming Club Events). They can also view the name and username/email of all enrolled Club Student Users in their School Club through the Members page.

- For Outside School Clubs, a Community Partner can also serve as a Club Signatory for Outside School Clubs. Or a third party, adult volunteer can begin the application process for an Outside School Club even if they will not be the one facilitating the Outside School Club. The Club Signatory is responsible for signing the Participation Agreement as a prerequisite to creating a Club. Club Signatories can access a view-only version of the curriculum and view important Club details on the Program Info page (for their Outside School Club: Outside School Club Facilitator name and email, number of enrolled Outside School Learner Users, and any upcoming Club Events). They can also view the name and username/email of all enrolled Outside School Learner Users in their Outside School Club through the Members page.

Community Partners and School Club Administrators, can help to start new Girls Who Code Clubs in their area.

- For School Clubs, School Club Administrators can use their Clubs HQ account to preview the School Club's curriculum and learn about other Girls Who Code Program opportunities. They can access Resources for Community Partners and view basic Clubs data (total number of Clubs, Teacher Facilitators, Outside School Club Facilitators, and Club Student Users affiliated with their Partnership). They can also view basic details about the Clubs affiliated with them on

the Club Details page, including Facilitator name(s), curriculum type, renewal status, and number of enrolled members to support the renewal and enrollment efforts. They can use an invite tool to email other potential Facilitators in their network. Finally, they can schedule a meeting with a Girls Who Code Staff Member, their "Community Partner Manager" through an integration with Yesware scheduling.

- For Outside School Clubs, Community Partners can use their Clubs HQ account to preview the Outside School Club's curriculum and learn about other Girls Who Code Program opportunities. They can access Resources for Community Partners and view basic Club data (total number of Clubs, Teacher Facilitators, Outside School Club Facilitators, and Club Student Users affiliated with their Partnership). They can also view basic details about the Clubs affiliated with them on the Club Details page, including Facilitator name(s), curriculum type, renewal status, and number of enrolled members to support the renewal and enrollment efforts. They can use an invite tool to email other potential Facilitators in their network. Finally, they can schedule a meeting with a Girls Who Code Staff Member, their "Community Partner Manager" through an integration with Yesware scheduling.

Basically,

GWC Clubs HQ offers opportunities for School Clubs and Outside School Clubs to access GWC curriculum and resources. A User can sign up for a Student Club Account or an Outside School Learner Account, depending on if they are participating in school or outside of school. If a User is under thirteen (13), they will need a parent/guardian to create an Outside School Club Child Account and consent to their use of Clubs HQ. If a Club Student User is under thirteen (13), a Teacher Facilitator must be directed by their Teacher Facilitator, who represents to GWC that they have authority to act as the agent of the parent and consent on the parent's behalf for the Club Student User to use GWC for educational purposes. Adults can also sign up for either a Teacher Facilitator Account (if they are an employee of a school) or an Outside School Club Facilitator Account, depending on if they are hosting a Club in school or out of school. Additional roles can support Clubs both in school and outside school.

HOW DOES GWC COLLECT, SHARE, AND PROTECT CHILDREN'S PERSONAL INFORMATION?

Please see our Children's Privacy Policy here.

WHAT INFORMATION DOES GWC COLLECT?

We collect two types of information about you: (1) information that you voluntarily provide us by using the Club Services (described below under "Information You Provide to Us") and (2) information collected automatically as result of your use of the Club Service (described below under "Information We Collect Automatically"). 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 whether you are signed up as a Teacher Facilitator, non-school adult Club leader ("Outside School Club Facilitator"), a School Club Administrator, non-school Club partner administrator ("Community Partner") parent, Club Student User, Outside School Minor Users or Outside School Club Child Users and how you use GWC (e.g., for Club Student Users, the end of the program survey, collected via Alchemer, we may need to collect feedback on Teacher Facilitator engagement). 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.

Basically,

GWC asks for some information directly from Teacher Facilitators, Outside School Club Facilitators, School Club Administrator, Community Partners, parents, Outside School Club Child Users and Club Student 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 Personal Information about you when you use the Club Service. 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 Club 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 eight categories of Users on our Club Services: Teacher Facilitator, Outside School Club Facilitator, School Club Administrator, Community Partner, Club Signatory, parent, Club Student Users, Outside School Minor User and Outside School Club Child User. We describe the information collected from Club Student Users and Outside School Learner Users in the "How We Protect Children's Personal Information" section above; for other users, we collect and store the following types of information from each type of user:

- **Account Creation Data and Profile Information:**
  In order to use certain Club Services that we offer via the Clubs HQ Platform, you may be required to create an account ("Account"). If you create an Account, you will be asked to provide us with certain information, such as your first and last name, birthdate and email address, country of origin, phone number, as well as a password that you will use for your Account ("Account Information").

- **School Information:**
  Teacher Facilitators and/or School Club Administrators may provide information regarding the school (name and address) that they work with, the grade of the Club Student Users in their School Club, and where the School Club will be hosted as well as what School Clubs they may be affiliated with.

- **Outside School Club Information:**
  We collect data about the Outside School Club and Outside School Club Facilitator and/or Community Partner with which it is affiliated, the location of the Outside School Club, the organizations associated with the Outside School Club, and the Outside School Club Facilitator at the Outside School Club. Additionally, aggregated data may be collected about a Club, such as the number of participants.

- **Education and other Demographic Information:**
  We collect School Club demographic data from a Teacher Facilitator for School Clubs. This data is reported in the aggregate, including the percentage of Club Student Users whose status is reported in the low income demographic (including free and reduced lunch) and Club Student Users whose status is reported in the Black, Latinx, and Indigenous ("BLI") demographic. We also collect Outside School Club demographic data from an Outside School Club Facilitator or, in the case of an Outside School Club Child User, the parent. This data is also reported in the aggregate, including the percentage of Outside School Club Child Users and Outside School Minor Users whose status is reported in the low income demographic (including free and reduced lunch) and the Outside School Club Child Users and Outside School Minor Users whose status is reported in the BLI demographic. Please note that we separately collect this information directly from Club Student Users and Outside School Minor Users as set forth in our Children's Privacy Policy.

- **User-Generated Content:**
  We collect any content created by your Account on message boards, answers to curricular activities questions, project galleries, or in email. Within School Clubs, Teacher Facilitators can submit projects in the project gallery for their School Club, and they can add a bio about themselves that is only visible to their own School Club and School Club Administrator. Within Outside School Clubs, Outside School Club Facilitators can submit projects in the project gallery for their Outside School Club, and they can add a bio about themselves that is only visible to their own Outside School Club and Community Partner.

- **Messaging and other User Communications:**
  On GWC Clubs HQ, we collect messages between Club Student Users and Teacher Facilitators, as well as between Outside School Learner Users and Outside School Club Facilitators, via message boards and answers to curricular activities. Additionally, we collect communications between GWC and Teacher Facilitators, Outside School Club Facilitators, School Club Administrators, Community Partners, and parents through GWC Club HQ, help desk ticketing systems, and direct emails from participants. GWC staff may also message Teacher Facilitators or Outside School Club Facilitators through support group channels utilizing their email addresses.

- **GWC Clubs HQ Calendaring Tool:**
  We collect information within GWC Clubs HQ from Teacher Facilitators and Outside School Club Facilitators about events created by their accounts, including date, time, location (if in person) or virtual conference links (if not in person), and title of calendared events. GWC may collect emails from other individuals (including external email accounts) that Teacher Facilitators, Outside School Club Facilitators, or GWC staff have invited to the event. However, GWC does not use these external emails collected for any purpose other than for event invitations. We also collect information (name, date, time) via Yesware for School Club Administrators and Community Partners that allows them to schedule check-ins with Girls Who Code staff.

- **Optional Virtual Events Information:**
  We collect information from Teacher Facilitators or Outside School Club Facilitators regarding virtual events (using systems such as Zoom, google, etc., each a "Virtual Event Tool"):
  - **For School Clubs:** Club Student User, parent, Teacher Facilitator, and School Club Administrator information to confirm event attendance (through name and email), how long those attending stayed in the Virtual Event Tool (collected and reported by the Virtual Event Tool on behalf of GWC), and any transcripts on the Virtual Event Tool (downloaded by GWC).
  - **For Outside School Clubs:** Outside School Learner User, parent, Outside School Club Facilitator, and Community Partner information to confirm event attendance (through name and email), how long those attending stayed in the Virtual Event Tool (collected and reported by the Virtual Event Tool on behalf of GWC), and any chat logs on the Virtual Event Tool (downloaded by GWC).

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

  Within Virtual Event Tool recordings, we collect (through downloading recordings and.or collecting reports 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 Users to ensure the safety and quality of the virtual events for the Club Services. These recordings are automatically deleted by the Virtual Event Tool after fourteen (14) days and are reviewed by GWC's safety and quality teams as needed. To learn more about these rules for Zoom in particular, read the Zoom Retention Policy. Otherwise, please see the GWC FAQ on retention.

- **Background Check Information for Outside School Club Facilitators or Teacher Facilitators:**
  We collect background information for any Teacher Facilitator or Outside School Club Facilitator that is not an employee of the school or outside school organization hosting the Club. With the consent of either the Outside School Club Facilitator or the Teacher Facilitator, GWC performs background checks (which may include a Sex Offender Search (sources include but are not limited to National Sex Offender Public Website and national and state sources), Global Watchlist Search (sources include but are not limited to Office Of Inspector General, European Union Consolidated List, Drug Enforcement Agency Fugitives, Government Sanction

Databases, US Terrorist List), National Search (sources include but are not limited to Warrant sources, Department of Corrections sources, Arrest sources, Court sources), and County Searches (sources include but are not limited to County Courthouse records) on all applications using a third party service provider. Applicants will share with this service provider their full name, phone number, email address, date of birth, social security number, zip code and electronic signature. GWC then has access to the background check information (through accessing the third party's portal) and the last four digits of Social Security Number.

- **Surveys:** Your responses to surveys that we or our Club Service providers might ask you to complete for internal research purposes and product improvement. These surveys may also ask for your name and email as well as other free form and multiple-choice fields.

- **Conduct and Safety Information:** If a user reports another user on the Club Service (e.g. such as through a "report a message" button) for conduct or safety issues, Girls Who Code collects the information provided in the report (e.g. the username, the content being reported, the reason for reporting) to investigate the report.

- **Contact Information and Correspondence with GWC:** As a user of the Club Service, you may choose to provide us with your Personal Information, such as a name, email address, and telephone number. Some examples include when you send us an email asking a question, communicate with customer support, participate in a video testimonial about our Club Service, or choose to participate in any research efforts, including a customer feedback session with Girls Who Code to improve the Club Service. 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 email, the email address collected is not further used to market to the individual beyond providing the services requested or responding to the requests.

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 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 ask you for different types of information based on who you are (Teacher Facilitator, Outside School Club Facilitator, School Club Administrator, Community Partner, parent, Club Student User, Outside School Minor Users or Outside School Club Child Users) and which GWC features you use (e.g., sending a message between a Teacher Facilitator and a Club Student User). 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 Club Services, we (or our Club Service providers) may use various technologies that automatically record or collect certain information, including Personal Information, from your browser or your device about the Club 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 Club 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 Club 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 Club Service providers) may use cookies or similar technologies to identify your browser or device. We (or our Club Service providers) may also use these technologies (never in Club Student User or Outside School Club Learner User logged in areas of our Club Service) in connection with advertising of our service that may appear on other sites or in connection with advertising their products outside of our Club Service (e.g., if you view an embedded YouTube video player on our Club 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 Club 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 for third-party products and Club 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 Club 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 Club Services, administer the Club Services, tailor the Club Services for you, and to help the Club 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 Club 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 Club 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 Club Service we (or our Club 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 Club Service, such as your activity on the Club Service (including product event data used to track progress or user activity), and the frequency and duration of your visits to the Club 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

  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 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 Club Services based on usage pattern data and for analytics. Third party sharing of IP address information for analytics and advertising is not allowed for Club Student Users, Outside School Club Child Users and Outside School Minor Users. We automatically delete IP Addresses tracked in server logs after six months.

- **Location information:** When you use our Club 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 a teacher or parent is searching for a GWC Club), we ask for your explicit opt-in permission. We never request precise geolocation data from Club Student Users, Outside School Club Child Users, or Outside School Minor Users within their Club. From all 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 Club Service providers as necessary to provide the Club 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 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 Club Services, including for

internal analysis on product usage and quality. We may also use it to track progress in the Club Service, and for sending push or email notifications to the parent's, Teacher Facilitators, Outside School Club Facilitators, Club Student Users, or Outside School Learner User's device to encourage them to take certain actions in the GWC Club 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 as a Teacher Facilitator, Outside School Club Facilitator, School Club Administrator, Community Partner, or parents, we'll ask for your explicit, opt-in consent. We never request precise geolocation data from Club Student Users or Outside School Learner Users.

Information Received from Third Party Sources

We may also obtain information, including Personal Information, from Third-Party Sources 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 the name of teachers and address of schools). 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 Club 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 child's Personal Information to any third-party for any purpose – including for advertising or marketing purposes. Third-Party Advertising is not permitted on areas where users are required to log in to GWC and Personal Information collected from Club Student Users and Outside School Leaner Users in Clubs is never used for Behaviorally-Targeted Advertising to Club Student Users or Outside School Learner Users (by us or third-parties). We may serve Contextually Relevant Advertising for third-party educational products and Club Services that we believe may be of interest to you (e.g., our Summer Immersion Program). 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. Our use of information collected from Club Student Users, Outside School Minor Users, and Outside School Club Child Users using the Club Services is set forth in our Children's Privacy Policy. More specifically, this information collected from Teacher Facilitators, Outside School Club Facilitators, School Club Administrators, Community Partners , and parents is used to:

- ***Power Our Club Services:*** This includes, operating, providing, enhancing and improving the Club Service, for example, by developing new products and features, and personalizing or customizing the Club Service for you.
- ***Provide Internal Analytics and Reviews:*** This includes using for internal audits and review, for analyzing how the Club Services are used, providing statistics about the usage levels of the Club 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 Club Services or changes to our policies and Club Services or communicate with you about your use of the Club 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 Club Services (including notifying you of data privacy incidents). Additionally, we may provide Teacher Facilitators, Outside School Club Facilitators, School Club Administrator, Community Partner, or parents information about events, announcements, offers, promotions, products, including third-party products, and Club

Services we think will be of interest to you and 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 Club Services.
- ***Security and Fraud Prevention*:** Most crucially, to protect our community by making sure the Club 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 Club 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.

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").

When acting as a Controller, We process this information given our legitimate interest in improving and protecting the Club Service and our 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 Club 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 Club 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 Club 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.

Basically,

GWC doesn't Sell or rent your information to third-parties, we don't permit Third-party advertising on the Club Services, and Personal Information collected from Club Student Users and Outside School Learner Users is never used for Behaviorally-targeted advertising to Club Student Users or Outside

School Learner Users. We use your information to provide and personalize the Club Services to you, optimize and improve our Club Services, communicate with you about our Services, and for security and safety reasons. We may also use the information provided by Teacher Facilitators, Outside School Club Facilitator, School Club Administrator, Community Partner, or parents to provide information about events, announcements, offers, promotions, products, including third-party products, and Club Services we think will be of interest to you.

WILL GWC SHARE ANY INFORMATION IT COLLECTS?

GWC does not Sell or rent your (or your child's) Personal Information to any third-party for any purpose - including for advertising or marketing purposes. Third-party advertising is not permitted on areas where users are required to log in to GWC Clubs HQ and Personal Information collected in the Club Services from Club Student Users and Outside School Learner Users is never used for behaviorally-targeted advertising to Club Student Users or Outside School Learner 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 Club Privacy Policy and as set forth below:

- **Other Users You Share and Communicate with on GWC Clubs:** No Teacher Facilitator, Outside School Club Facilitators, School Club Administrator, Community Partner, parent, Club Student User, or Outside School Learner User accounts are made available to the general public through our Club Service. Furthermore, Club Student Users cannot share their account information, profile, or answers to curricular questions with anyone on GWC Clubs, outside of their parents, Teacher Facilitators (including those at other schools), or School Club Administrators. However, Club Student Users may share their Projects via the Club Project Gallery with other members of their Club and any logged in Club user, as well as their Teacher Facilitator and parents. More information is covered in our Children's Privacy Policy. If you are a Teacher Facilitator, Outside School Club Facilitator, School Club Administrator, Community Partner, or parent you may choose to share information or content through the Club Services with other Teacher Facilitators, Outside School Club Facilitators, School Club Administrators, Community Partners, or Club Student Users - for example, things like your account information, or other information you share with your Teacher Facilitator, Outside School Club Facilitator, School Club Administrator, Community Partner, or parent that you are communicating with through focus groups or virtual meetings and workshops, or our other collaboration features.

  Please keep in mind that information (including Personal Information or children's Personal Information) or content that you (as an adult participant) voluntarily disclose to others - including to other GWC users you interact with through the Club Service (such as messages you might send other users or other Teacher Facilitators, Outside School Club Facilitators, School Club Administrators, Community Partners 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 Club Service:** When, as a Teacher Facilitator, Outside School Club Facilitators, School Club Administrator, Community Partners, Club Student User, Outside School Club Learner User, or parent, you use third-party apps, websites, or other services that use, or are integrated with, our Club Service, they may receive information about what you post or share. For example, when as a facilitator or parent you share a link to a User submission on Twitter or Facebook, or as a Teacher Facilitator you provide third party links for your Club Student Users to utilize in class, these services receive the information that you share through this functionality and information that you are sharing from GWC. Please see here for more information on third-party services. Please see here for a list of third-party app integrations on our Club Service.

- **Club Service providers:** We do work with vendors, Club Service providers, and other partners to help us provide the Club Services by performing tasks on our behalf. These Club 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 Club 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 Club 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 Club Services on those websites or applications (this will never include Personal Information of Club Student Users or Outside School Club Child Users). We may also share certain Personal Information (never of Club Student User or Outside School Club Child Users) 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 Club 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 Club 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:** 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 Club 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 Club 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 Club Service providers who help us provide you with the Club 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 Club Service or to third-parties that are integrated on our Club Service.

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 Club 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 Club 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 Club 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 Club Student Accounts , Outside School Club Child Account, and Outside School Minor Account after a specific period of time, as per our retention policy, described in the "How Long Does GWC Keep Children's Information?" section.
- 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 Club 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 Teacher Facilitators, Outside School Club Facilitators, School Club Administrator, Community Partner, Club Student User, Outside School Learner Users, or parents. You can help us out by keeping your password secret! When you enter Personal Information anywhere on the Club 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.

Teacher Facilitator, School Club Administrator, Outside School Club Facilitator, Community Partner, or parent Users:

We store your Personal Information for as long as it is necessary to provide the Club 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. Please note that even if your account is deleted, messages sent between Teacher Facilitators and parents are retained to assist schools with various recordkeeping or compliance obligations. Additionally, some content uploaded by a Teacher Facilitator, Outside School Club Facilitators, School Club Administrator, Community Partners, or parent, including photos, videos, and voice recordings are retained at the direction of the school (e.g., for legal compliance reasons such as maintenance of "education records" under FERPA or "Student Data" under various state student privacy laws or equivalent laws in international jurisdictions) and will not be deleted until we receive direction from the school. 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 Club 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, 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.

Club ***Student Users*** ***and*** ***Outside School Learner Users:***

Please see "How Long Does GWC Keep Children's Information?" for details on how long we retain data for Club Student Users and Outside School Learner Users.

Even if you delete your account, keep in mind that the deletion by our Club Service providers 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 required by law.

Basically,

We keep Teacher Facilitator, Outside School Club Facilitators, School Club Administrator or Community Partners, or parent Personal Information until your account is deleted, or until we no longer need it to provide you with the Service. Please see "How Long Does GWC Keep Children's Information?" for details on how long we retain data for Club Student Users and Outside School Learner Users. 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?" in our FAQs. Even if you delete your account, keep in mind that the deletion by our Club 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 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
- Take information out of GWC

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 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 account on GWC 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 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.
- Accessing Your Child's Information: Visit our "Parental Choices" section to see how you can obtain copies of your child's Personal Information.

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, or by contacting us or your child's school if they created your child's account. Please see here for more information on accessing your child's information.

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 account (or your child's account, if you are their parent), you can do that at any time by contacting us as set forth above. If you are a Teacher Facilitator, Outside School Club Facilitator, School Club Administrator, Community Partner, or parent using the Club Services, you may also delete your account by logging into your account and accessing your account settings page.

When you delete your 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 depending on the category of user you are (i.e., Teacher Facilitator, Outside School Club Facilitator, School Club Administrator, Community Partner, Club Student User, Outside School Club Learner User, or parent), 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. Additionally, please note that even if your account is deleted, messages or content shared between Teacher Facilitators, School Club Administrators, or parents (or a Teacher Facilitator, School Club Administrator and a Club Student User) are retained to assist schools with various recordkeeping or compliance obligations. This includes, for example, any content uploaded, including photos and videos, or comments on projects or curricular activities. Additionally, some content within a Club Student Account and other content uploaded by the Club Student User and/or Teacher Facilitator, will be kept after the Club Student Account is deleted for school legal compliance reasons (e.g., maintenance of "education records" under FERPA or "student data" under various state

student privacy laws or equivalent laws in international jurisdictions). If you would like this content deleted, please first put in a request to your (or your child's) school. If the school determines that the request should be implemented, the school may submit the request to GWC by contacting us at privacy@girlswhocode.com. For more details, please read "What happens when I delete my account?" in our FAQs.

We aim to maintain our Club 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 Clubs Service, 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 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 account by visiting your account settings, or simply by contacting us at privacy@girlswhocode.com from the email used to create your GWC account or by following the instructions here once you are signed in to your GWC account. For more details on what happens when you delete your account, click here. Please note that some content will not be deleted given various compliance and recordkeeping obligations schools have (e.g., maintenance of "education records" under FERPA or "student data" under various state student privacy laws or equivalent laws in international jurisdictions). Please contact your (or your child's) school if you would like all of this content deleted. If the school determines that the request should be implemented, they may submit a request to us by contacting us at privacy@girlswhocode.com.

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 Teacher Facilitators, Outside School Club Facilitators, School Club Administrators, Community Partners, or parents 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 account and we'll help you right away.

WHAT COMMUNICATIONS WILL I RECEIVE FROM GWC?

If you registered on GWC, 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 account and the Club Services, including privacy and security notices, updates regarding the Club Services, and information regarding products, features or services from GWC or third-parties we believe you may be interested in. We do not send communications about third-party products, features or services to Club Student Users or Outside School Club Child Users, provided however, that we may send limited emails regarding educational opportunities to Club Student Users, Outside School Club Child Users and Outside School Minor Users ("Program Communications"). Program Communications are any in-app or emailed communications relating to Girls Who Code's educational services, including prompts, messages and content relating to the use of the Service, for example; onboarding and orientation communications, prompts for Club Students to complete, or Club Teacher Facilitators to assign exercises or provide feedback as part of the learning exercise, periodic activity reports, suggestions for additional learning activities in the Service, service updates (for example new features or content, including using for at home learning opportunities), and information about special or additional programs (e.g. summer programming) offered through the Services or Girls Who Code's website or application. 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, in your role as a Teacher Facilitator, Outside School Club Facilitator, or Community Partner, 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. You are consenting to GWC (on your behalf) sending these informational text messages.

If, as a parent/legal guardian of a Club Student User, you provided an email address or phone number to your child's school, GWC, at the direction of the school, may send an invitation to join GWC via the email or phone number your child's teacher provided GWC. The invitation (and any invitation reminders) may be sent via email or SMS/MMS text message. If, as a parent/legal guardian, you provide your telephone number to your child's school, you are consenting to GWC (on behalf of and at the direction of your child's school) sending informational text messages closely related to the school's mission.

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'.

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.

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 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. 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. Please note, that when using an Authentication Service for registering a Club Student User or Outside School Learner User (or if a Club Student User or Outside School Learner User is directly using their own Authentication Service), GWC will not request more information from the Authentication Service than name, email address and date of birth unless specifically requested or chosen to be passed by the User to GWC when used in connection with the Club Services in school. We will only use the email collected for authentication from Club Student Users for the purposes of login and account management. Please note that for parent and family users, we may also show the email address provided to us from the Authentication Service to the teacher the parent is requesting to connect to in order to help the teacher validate the parent and/or family user. The Authentication Service may collect certain other information from you in your use of that particular service (such as G-Suite for Education). 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 Club 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 users to register on our Club 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.

Please note, that when using an Authentication Service for registering a Club Student User or Outside School Leaner User (or if a Club Student User or Outside School Learner User is directly using their own authentication service), GWC will not request more information from the Authentication Service than name and email address unless specifically requested or chosen to be passed by the Teacher Facilitator or school to GWC.

THIRD-PARTY SERVICES

The Club Services may contain links to websites, applications, services, or other content provided by third-parties (e.g., video players) ("Third Party Links"). In addition, Teacher Facilitators, Outside School Club Facilitators, School Club Administrators, or Community Partners may choose to place third-party links to outside resources for Club Student Users or Outside School Club Learner Users within their use of the Club Service (e.g. in a Teacher Facilitator putting a link in to a message on a message board). GWC does not control or monitor any such School Third Party Links and does not encourage Club Student Users to click on School Third Party Links through the product. 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 Club Services, but may appear to still be playing on our Club 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 Club Service — 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.

When the GWC Club Services are used in connection with school use, GWC acts as a Processor (or service provider as defined under CCPA or other applicable privacy laws) and we will process Personal Information, including Student Data, only at the direction and control of the school. Additionally, GWC will only delete Personal Information and Student Data or education records per the school's specific instructions. As a Club Student User or Teacher Facilitator (or parent making a request about a Club Student User's Personal Information), you should direct any requests for access, correction or deletion of Personal Information through the school as further detailed here.

GWC will generally be the Controller when:

- Teacher Facilitators, Outside School Club Facilitators, School Club Administrators, Community Partners, or parents enter Personal Information directly into our Club Services when registering for an account.
- Parents, Outside School Learner Users, or Outside School Club Child Users use our Club Services not in connection with school use.

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

U.S. STATE DATA PRIVACY DISCLOSURE

Overview

Girls Who Code Club Services are not offered or intended for users outside of the United States. If you are a U.S. resident, we process your Personal Information in accordance with applicable U.S. state data privacy laws. Some U.S. state privacy laws, like the CCPA, the Virginia Consumer Data Protection Act (VCDPA), the Colorado Privacy Act (CPA), Connecticut Act Concerning Personal Data Privacy and Online Monitoring (CTDPA), and the Utah Consumer Privacy Act (UCPA) require specific disclosures for state residents. This section of our Club Privacy Policy contains information required by the CCPA and other U.S. state data privacy laws.

Please note that state data privacy laws are constantly in flux, and the rules implementing some of these laws have not yet been finalized.We are continuously working to ensure we stay abreast of and

remain compliant with these laws, and we will update our processes and disclosures as these implementing rules evolve.

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 our 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 privacy 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 privacy 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 privacy law with a similar right. Unless permitted by the CCPA or any other applicable U.S. state data privacy 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 privacy law, that can result in different prices, rates, or quality levels. Any CCPA-permitted (or other U.S. state data privacy 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 state specific privacy law, such as, the CCPA, VCDPA, CPA, CTDPA 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 state privacy 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 privacy laws. Sensitive Personal Information is a subset of Personal Information and is defined differently under applicable U.S. state data privacy 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 privacy 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 Club 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 privacy 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 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 Club 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 Club 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 Club 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 Club 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 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 Club Service, 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 Club 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, Dojo Tutoring 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, or the parent of a child using GWC under the age of 18 residing in California, you are entitled to request removal of content or information you (the minor) have publicly posted on our Club Services. Minors (or the minor's parents if under 13) have the option to delete Personal Information associated with their user accounts or content that they upload through their Club Student Account on their Club Services or content they may share with other children through their Outside School Club Child Account. If you are a minor, or the parent of a minor under 13, and would like to delete Personal Information associated with your Club Student Account or Outside School Club Child Account or content you uploaded through your Club Student Account or Outside School Club Child Account, please follow the directions set forth in the "GWC's commitments to providing Transparency and Your Rights" section, which may include the need to contact your school first. Although we offer deletion capabilities on our Clubs Service, you should be aware that the removal of content may not ensure complete or comprehensive removal of that content or information posted through the Club Service, 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 at the direction of the school or under applicable laws.

Basically,

If you are a minor 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 Club 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 Club Privacy Policy without your explicit consent. If we make any significant changes, we'll provide prominent notice by posting a notice on the Club Services and/or notifying you by email (using the email address you provided), so you can review and make sure you know about them.

In addition, if we ever make material changes to the types of Personal Information we collect from children, or how we use it, we will notify parents in order to obtain parental consent or notice for those new practices and provide schools with the necessary information about these changes where they have acted as the agent of the parent and provided consent on their behalf.

We encourage you to review this Clubs Privacy Policy from time to time, to stay informed about our collection, use, and disclosure of Personal Information through the Club Services. If you don't agree with any changes to the Clubs Privacy Policy, you may terminate your account (although we'll be sad to see you go!). By continuing to use the Club Services after the revised Club Privacy Policy has become effective, you acknowledge that you accept and agree to the current version of the Clubs Privacy Policy.

We reserve the right to notify you of updates to our Clubs 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 Club 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 Privacy Policy. If we make material changes to the types of Personal Information we collect from children, or how we use it, we will notify parents, or ask for their consent and provide schools with the necessary information about these changes where they have acted as the agent of the parent and consented on their behalf.

HOW CAN I CONTACT GWC WITH QUESTIONS?

If you have any questions or concerns about this Clubs 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 Teacher Facilitators, Outside School Club Facilitators, School Club Administrators, Community Partners, Club Student Users, Outside School Club Learner Users, or parents seeking more information on how we provide safety on GWC, we provide privacy and security related materials on our Privacy Center as well as on our Security Whitepaper.

For Key Terms that are used in this Club Privacy Policy and our Terms of Service, please visit this 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 for your school, please visit our Privacy Center or our Security Whitepaper. For definitions of Key Terms used in this policy and our Terms of Service, visit here.