

# **The Coding School Privacy Policy**

*Updated as of March 7, 2022*

## **INTRODUCTION**

The Coding School (“TCS,” “we,” “our,” or “us”) respects the privacy of your information. This Privacy Policy is designed to explain how we collect, use, and safeguard the information you provide to us when you visit our websites (“Sites”), when you use our web application (“TCS Portal”), and when you participate in TCS-related programming, which includes but is not limited to workshops, webinars, camps, one-on-one and small group lessons, and courses (the “Programs”) and the services provided through our Sites, TCS Portal, and Programs (collectively the “Services”). If the user of the Site or Services is under eighteen (18) years of age, “you” refers to the parent or legal guardian of the child under eighteen (18) years of age.

From time to time, we may change this Privacy Policy. If we do, we will post an amended version on our website. If we make material changes to our Privacy Policy, we may also notify you by other means, such as sending an email or posting a notice on our home page. If required by applicable data protection laws, we will obtain your consent to any material changes. Please review this Privacy Policy periodically.

In order to register for any Programs or to create a TCS Portal account, you must be over the age of eighteen (18). Parents registering for any Program or creating a TCS Portal account on behalf of their child under eighteen (18), must provide their consent at the time of registration and/or creation to permit us to collect any information from their child.

This Privacy Policy covers the following topics:

- 1. WHAT IS TCS?**
- 2. COLLECTING AND USING INFORMATION**
- 3. COOKIES AND OTHER TRACKING TECHNOLOGIES**
- 4. THIRD PARTY PROCESSORS**
- 5. INTERNATIONAL DATA TRANSFERS**
- 6. “DO NOT TRACK” SIGNALS**
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### **1. WHAT IS TCS?**

TCS is a 501(c)(3) organization that aims to empower the next generation through computer science education. Founded by a Brown University undergraduate in 2014, TCS has grown into an international organization with 800+ instructors and students from over 125 countries participating in our programs.

TCS is located at 3940 Laurel Canyon Blvd. Suite 153, Los Angeles, CA 91604. TCS is the data controller of all personal data collected from residents of the European Economic Area or the United Kingdom.

### **2. COLLECTING AND USING INFORMATION**

#### **Personal Data We Collect**

Through your use of the Services, we will collect personal data from you. For purposes of this Privacy Policy, “Personal Data” refers to any information relating to an identified or identifiable natural person that we maintain in an accessible form.

#### *Information You Provide*

When you use the Services, you may voluntarily provide us with the following types of Personal Data:

- *Registration or Application for a Program.* When you register for a Program or submit an application for a Program, you will provide us with your name, address, city, state, phone number, gender, email address, school, grade level, ethnicity, if you speak any language in addition to English, and if applicable, whether the following demographic applies: female, minority, low income, learning disability, LGBTQ+, and/or rural community status.
- *Register for a TCS Portal Account.* When you register for our Services, we may provide you with an invitation link that will give you access to the TCS Portal. We will populate your account with the information you provided during the registration process. We will ask you to create a password for future logins. You will have the option to add a username, profile picture, biographical information, location, projects you are working on, and videos of your projects to your account.
- *Instructors.* If you are an instructor, you will create a TCS Portal account. You will provide us with your email address, and you will create a password for future logins. You will have the option to add a username, profile picture, biographical

information, location, projects you are working on, and videos of your projects to your account.

- *Purchases.* If you choose to purchase lessons or any of our Services, you will provide our third-party payment processor with your payment information and billing address. We use Stripe and PayPal to process payments. Please review Stripe's privacy policy [here](#) and PayPal's privacy policy [here](#).
- *Surveys and Interviews.* When you complete a survey or an interview with us, you will provide us with your name, email address, phone number, age, grade level, programming experience, and any other information you choose to provide.
- *Registering for a Competition or Special Event.* When you register for a competition or special event, you will provide us with your name, email address, phone number, age, grade level, programming experience, and any other information you choose to provide.
- *Communicate in a TCS-Sponsored Platform.* When you communicate in a TCS-Sponsored Platform, such as Discord, Piazza, or a video conferencing platform, you will provide us with your name, email address, and any other information you choose to provide.
- *Participant Content.* When you submit a homework assignment or quiz, create a project, write comments, or post on forums, you will provide us with your name, username, and any other information you choose to provide.
- *Scan Your Badge or Connect With Us.* If you are at a trade show or a marketing event, you may scan your badge or leave you information with us, and we will collect your name, company name, job title, address, phone number, and email address.
- *Get Involved.* If you request to get involved as a teacher or mentor, partner, educational partner, or guest mentor, you will provide us with your name, email address, city and state, school or company/organization, year in school or job title, and any other information you choose to provide.
- *Job Applications or Volunteers.* When you apply to work or volunteer with us, you will provide us with your name, email address, phone number, physical address, employment history, and education history.
- *Subscribe to Our Mailing List.* To subscribe to our mailing list, you will provide us with your email address and you may provide your name.

- *Make a Donation.* To make a donation on our Sites, you will provide your name, email address, and credit card information. We use Give Lively or PayPal to process donations. Please review Give Lively's privacy policy [here](#) and PayPal's privacy policy [here](#).
- *Contact Us.* When you contact us or request additional information about our Services, you may need to provide us with your name, email address, phone number, time zone, and any other information you may choose to provide us with.

### *Information as You Navigate Our Services*

We automatically collect certain Personal Data through your use of the Services. We will automatically collect certain Personal Data, such as the following:

- *Usage Information.* For example, the pages on the Sites you access, the frequency of access, and what you click on while using the Sites.
- *Device Information.* For example, hardware model, operating system, application version number, and browser.
- *Mobile Device Information.* Aggregated information about whether the Services are accessed via a mobile device or tablet, the device type, and the carrier.
- *Location Information.* Location information from Service visitors on a city-regional basis.

### *Third Party Information*

In some cases, we may receive certain Personal Data from you about a third party. For example, if you invite others to use our Services, you will provide us with the third party's email address in order to send the invitation. If you submit any Personal Data about another individual to us, you are responsible for making sure that you have the authority to do so and to allow us to use their Personal Data in accordance with this Privacy Policy.

## **How We Use Your Personal Data**

We use the Personal Data we collect to provide the Services to you, to improve our Services and Site, and to protect our legal rights. In addition, we may use the Personal Data we collect to:

- Review and process your registration or application;
- Process your TCS Portal account registration;

- Deliver a high quality and customized learning experience;
- Process your purchases;
- Manage your participation in a Program;
- Process job or volunteer applications;
- Provide access to Services required for completion of the intended Program;
- Provide you with a certificate of completion if you complete a Program;
- Review and grade your homework assignments and quizzes;
- Publish testimonials;
- Create student spotlights, publish names of high performance, or recognize achievements;
- Send you certificates or merchandise;
- Provide our school partners with relevant progress reports and grades if you are receiving course credit or participating through a partner school;
- Provide aggregate reports to our partner organizations, including funders and academic collaborators;
- Address any absences, Code of Conduct violations, or other issues with participants' voluntarily provided references;
- Aggregate and analyze Program and organizational effectiveness, demographics, and other metrics for internal, external, and research purposes;
- Aggregate data to market and communicate the value of our Programs;
- Contact you regarding our Programs and Services that we feel may be of interest to you;
- Communicate with you about our Programs or Services or to inform you of any changes to our Programs or Services;
- Provide support;
- Maintain and improve our Programs and Services;
- Defend our legal rights and the rights of others;
- Efficiently maintain our business; and

- Comply with applicable law.

## **How We Share Your Personal Data**

We may share the information that we collect about you in the following ways:

- With service providers who perform data services on our behalf (e.g., email, hosting, maintenance, backup, analysis, etc.);
- To service providers to prepare, deploy and analyze advertising content;
- To the extent that we are required to do so by law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise, or defend our legal rights, including providing information to others for the purposes of fraud prevention;
- To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that Personal Data where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that Personal Data;
- To any other person or entity as part of any business or asset sale, equity transaction, merger, acquisition or in preparation for any of these events; and
- To any other person or entity where you consent to the disclosure.

## **3. COOKIES AND OTHER TRACKING TECHNOLOGIES**

Like many other companies, we use cookies and other tracking technologies (such as pixels and web beacons).

### **Google Analytics**

We use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses Cookies or other tracking technologies to help us analyze how users interact with the Sites and Services, compile reports on their activity, and provide other services related to their activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a returning visitor, and any referring website. The technologies used by Google Analytics do not gather information that personally identifies you. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's [privacy policies](#). To learn more about Google's partner services and to learn how to opt-out of tracking of analytics by Google, click [here](#).

## **4. THIRD PARTY PROCESSORS**

To ensure that your Personal Data receives an adequate level of protection, we have

put in place appropriate procedures with the service providers we share your Personal Data with to ensure that your Personal Data is treated by those service providers in a way that is consistent with and which respects the applicable laws on data security and privacy. For example, we use web-based learning management systems, video conferencing platforms, cloud data storage, shipping fulfilment, accounting systems, payment processors, and marketing service providers.

## **5. INTERNATIONAL DATA TRANSFERS**

We operate internationally and transfer information to the United States for the purposes described in this policy. The United States may have privacy and data protection laws that differ from, and are potentially less protective than, the laws of your country. Your Personal Data can be subject to access requests from governments, courts, or law enforcement in the United States according to the laws of the United States.

For any transfers of Personal Data from the European Economic Area (EEA), Switzerland or the United Kingdom that we make to other entities as described in this Privacy Policy, we use appropriate safeguards to ensure for the lawful processing and transfer of the Personal Data, including, when appropriate, the use of standard contractual clauses approved by the European Commission. To obtain a copy of the safeguards, contact us at [info@the-cs.org](mailto:info@the-cs.org).

## **6. “DO NOT TRACK” SIGNALS**

Some internet browsers incorporate a “Do Not Track” feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the “Do Not Track” signal, the Sites do not currently interpret, respond to or alter its practices when it receives “Do Not Track” signals.

## **7. ADVERTISING AND MARKETING CHOICES**

Depending on your location (and reflecting applicable law), you may have been asked to indicate your preferences, provide us with your consent regarding the receipt of such information from us, and indicate how you would like to receive it. Wherever you are located, we will send you marketing communications based on any preferences you may have expressed.

We only want to send you information in which you are interested. If you do not want to receive these communications or would like to understand more about other unsubscribe options, please contact us as set out in the “HOW TO CONTACT US” section below.

For email communications, you can opt-out and/or manage your preferences by clicking on the unsubscribe link provided at the bottom of any email you receive from us. You also may submit a request to us at [info@the-cs.org](mailto:info@the-cs.org). If we call you with information you do not want to receive, you can advise us of this during the telephone call.

## **8. THIRD PARTY LINKS**

The Sites and Services may provide links to third-party websites, services, platforms, and applications, and the Services may be offered through other third-party websites, platforms, and applications. Third-party websites, services, applications, and platforms are not under our control. Except as stated below, this Privacy Policy applies solely to Personal Data that is acquired through the Services. We accept no responsibility or liability for these other websites.

## **9. SECURITY**

We maintain commercially reasonable security measures to protect the Personal Data we collect and store from loss, misuse, destruction, or unauthorized access. However, no security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee absolute security.

## **10. CHILDREN'S PRIVACY**

Our Services are designed for users of all ages, including children under the age of 13. As a nonprofit entity, TCS is not subject to the Children's Online Privacy Protection Act (COPPA). However, we recognize the need to provide additional protections with respect to Personal Data we collect from children through our Services, including: notifying parents or legal guardians about our information practices with regard to children, including the types of Personal Data we collect, how we use it, and whether and whom we may share that information; obtaining consent from parents or legal guardians to register or apply for our Services; limiting collection of Personal Data from children to no more than is reasonably necessary to participate in the activity; and giving parents or legal guardians access or ability to request access to Personal Data we have collected from their children and the ability to request the Personal Data to be changed or deleted.

To make a request regarding your child's Personal Data, please contact us through the "How to Contact Us" methods provided below.

## **11. YOUR PERSONAL DATA AND YOUR RIGHTS –UNITED STATES ONLY**

### **California Shine the Light Law**

We do not disclose personal information obtained through our Services to third parties for their direct marketing purposes. Accordingly, we have no obligations under California Civil Code § 1798.83.

### **Notice to Nevada Residents**

Nevada law allows Nevada residents to opt-out of the sale of certain types of personal information. Subject to a number of exceptions, Nevada law defines "sale" to mean the exchange of certain types of personal information for monetary consideration to another

person. We do not currently sell personal information as defined in the Nevada law. However, if you are a Nevada resident, you still may submit a verified request to opt-out of sales and we will record your instructions and incorporate them in the future if our policy changes. Opt-out requests may be sent to [info@the-cs.org](mailto:info@the-cs.org).

## **12. YOUR PERSONAL DATA AND YOUR RIGHTS –EUROPE AND THE UNITED KINGDOM ONLY**

If you are in a country in the European Economic Area (EEA) or in the United Kingdom, you are entitled to the following explanation of the legal bases we rely on to process your Personal Data and a description of your privacy rights.

### **Legal Bases for Processing Your Personal Data**

The legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it.

#### *Consent*

We may process your Personal Data based on your consent such as when you create an account or when you ask us to send certain kinds of marketing communications. You have the right to withdraw your consent at any time without affecting the lawfulness of the processing based on consent before its withdrawal.

#### *Our Legitimate Interests*

We may process your Personal Data if doing so is necessary for our legitimate interests and your rights as an individual do not override those legitimate interests. For example, when we process your Personal Data to carry out fraud prevention activities and activities to increase network and information security, to market directly to you, to expand our business activities and to improve our services and the content and functionality of our Sites and Services.

#### *To Perform a Contract*

We may process your Personal Data to administer and fulfill contractual obligations to you.

#### *To Enable Us to Comply with a Legal Obligation*

We may process your Personal Data to comply with legal obligations to which we are subject. This may include any requirement to produce audited accounts and to comply with legal process.

#### *Necessary for the Exercise or Defense of Legal Claims*

If you bring a claim against us or we bring a claim against you, we may process your Personal Data in relation to that claim.

If you have any questions about or need further information concerning the legal basis on which we collect and use your Personal Data for any specific processing activity, please contact us using the “**HOW TO CONTACT US**” section below.

## **Your Rights**

### *Access Your Personal Data*

You have the right to obtain from us confirmation as to whether or not we are processing Personal Data about you and, if so, the right to be provided with the information contained in this Privacy Policy. You also have the right to receive a copy of the Personal Data undergoing processing.

### *Rectify Your Personal Data*

You have the right to ask us to rectify any inaccurate Personal Data about you and to have incomplete Personal Data completed.

### *Restrict Our Use of Your Personal Data*

You have the right to ask us to place a restriction on our use of your Personal Data if one of the following applies to you:

- You contest the accuracy of the information that we hold about you, while we verify its accuracy;
- We have used your information unlawfully, but you request us to restrict its use instead of erasing it;
- We no longer need the information for the purpose for which we collected it, but you need it to deal with a legal claim; or
- You have objected to us using your information, while we check whether our legitimate grounds override your right to object.

### *Object to Our Use of Your Personal Data*

You have the right to object to our use of your Personal Data where our reason for using it is based on our legitimate interests or your consent (rather than when the reason for using it is to perform an obligation due to you under a contract with us).

### *Delete Your Personal Data*

You can ask us to delete your Personal Data if:

- We no longer need it for the purposes for which we collected it;
- We have been using it with no valid legal basis;

- We are obligated to erase it to comply with a legal obligation to which we are subject;
- We need your consent to use the information and you withdraw consent;
- You object to us processing your Personal Data where our legal basis for doing so is our legitimate interests and there are no overriding legitimate grounds for the processing.

However, this right is not absolute. Even if you make a request for deletion, we may need to retain certain information for legal or administrative purposes, such as record keeping, maintenance of opt-out requirements, defending or making legal claims, or detecting fraudulent activities. We will retain information in accordance with the “How Long Is Your Personal Data Kept” section below.

If you do exercise a valid right to have your Personal Data deleted, please keep in mind that deletion by third parties to whom the information has been provided might not be immediate and that the deleted information may persist in backup copies for a reasonable period (but will not be available to others).

#### *Transfer Your Personal Data to Another Service Provider*

You may request that we transfer some of the Personal Data you have provided to you or another service provider in electronic copy. This applies to Personal Data we are processing to service a contract with you and to Personal Data we are processing based on your consent.

To exercise any of these rights, please contact us as described in the “**HOW TO CONTACT US**” section below.

#### *Make a Complaint*

If you have any concerns or complaints regarding our processing of your Personal Data, please contact us as described in the “HOW TO CONTACT US” section below and we will do our best to answer any question and resolve any complaint to your satisfaction.

If, for whatever reason, you feel we do not meet the standards you expect of us, you are also entitled to make a complaint to your local supervisory authority:

[EU Data Protection Authorities \(DPAs\)](#)

[Swiss Federal Data Protection and Information Commissioner \(FDPIC\)](#)

[Information Commissioner’s Office \(United Kingdom\)](#)

#### *How Long Is Your Personal Data Kept?*

We will retain your Personal Data for as long as necessary to fulfill the purposes for which we collect it and as set out in this Privacy Policy and for the purpose of satisfying any legal, accounting, or reporting requirements that apply to us.

### **13. YOUR CHOICES AND RIGHTS – REST OF THE WORLD**

Depending on the jurisdiction in which you are located, you may have certain rights with respect to your Personal Data. For example, you may have the following rights:

- Right to access your Personal Data;
- Right to receive a copy of your Personal Data, including in a machine-readable format;
- Right to delete your Personal Data;
- Right to update your Personal Data;
- Right to correct inaccurate, out-of-date, or irrelevant Personal Data;
- Right to anonymization, blocking or deletion of unnecessary or excessive Personal Data or Personal Data processed in noncompliance with applicable law;
- Right to receive information about public and private entities with which we have shared your Personal Data;
- Right to information about the possibility of denying consent and the consequences of such denial;
- Right to revoke consent;
- Right to data portability;
- Right to confirm that we are processing your Personal Data;
- Right to restrict our processing of your Personal Data;
- Right to not be subject to automated decision-making;
- Right to a verification procedure that provides whether we are in compliance with the applicable law; and
- Right to object to or opt out of direct marketing from us.

If you would like to exercise your legal rights, please contact us at [info@the-cs.org](mailto:info@the-cs.org). We will process your request in accordance with any applicable legal requirements.

For a description of the legal bases for which we collect your Personal Data, please see the section “**YOUR PERSONAL DATA AND YOUR RIGHTS –EUROPE AND THE UNITED KINGDOM ONLY - Legal Bases for Processing Your Personal Data**” above

### **14. HOW TO CONTACT US**

For questions or concerns about our privacy policies or practices, please contact us at [info@the-cs.org](mailto:info@the-cs.org) or write us at:

The Coding School

3940 Laurel Canyon Blvd. Suite 153  
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