



THE CODING SCHOOL PRIVACY POLICY

Last Updated: January 2, 2021

The Coding School (TCS) is a 501c3 educational nonprofit providing online lessons and courses in computer science for students K-12 and above.

This Privacy Policy describes how TCS (“The Coding School”, “we”, “us”, and/or “our”) handles the personal information we collect from and about you when you visit our websites, www.the-cs.org; www.codeConnects.org; www.qubitbyqubit.org (“the Site” or “the Sites”), when you or your children use our web application, app.the-cs.org (the “TCS Portal” and collectively with the Site, the “Service”), or when you otherwise interact with us. It also describes certain legal rights you may have, subject to applicable law, and how you can exercise them.

For the purposes of this Privacy Policy, “Personal Information” means information about identified or identifiable individuals, such as their name and email address, and includes “personal data” as defined by the European Union’s General Data Protection Regulation (“GDPR”) and “personal information” as defined by the California Consumer Privacy Act (“CCPA”).

By using TCS’s Service, you confirm you have agreed to the TCS Terms of Use, to the extent permitted by law, and have read and understood this Privacy Policy.

A Note for Minors: In order to register for TCS lessons or classes you must be over the age of 18. Parents registering for TCS on behalf of their child, must give their consent at the time of registration to permit us to collect Personal Information from their child.

Information We Collect

Information you give us directly: We collect information that you voluntarily provide in the following ways:



- **Information collected when you request information or join TCS.** When you fill in forms on our Site including when you request additional information about our Service, or contact our office or team members, we may require that you provide us with certain information such as your first and last name, email address, phone number, and time zone, as well as your child's name, age, your weekly availability, how you heard about TCS, and any other information about your child that you believe is relevant for us to know. If you choose to purchase lessons, we require that you provide us, or our third-party payment processor, Stripe, with your name, payment card information, and billing address.
- **Information collected when creating your child's account.** If you enroll for our Service, we will provide you with an invitation link that will give you access to the TCS Portal. We will populate your family's account with the information supplied during registration and ask you to set a password for that account that can be shared with your family. Later your child may choose to add information such as a username, profile photo, biographical information, location, projects s/he is working on, and videos about these projects. We advise students to choose a username that does not reveal their real name or any other information that could identify them. Other TCS users will be able to see your child's username, chosen avatar or profile photo, general location, and any other content they choose to make public.
- **Information collected from instructors.** When instructors join TCS, we ask them to provide us with their email address and may create a password for their account. Like students, instructors can choose to add information such as a username, profile photo, biographical information, and their location. Over time, we may collect information about the classes instructors are associated with, their responses to surveys and feedback requests, and reviews from their students.
- **Information collected when you or your child contacts us.** When you or your child contacts us by email; through our branded social media



accounts; through any integrated chat providers we may provide, or by telephone, SMS, or physical mail, we may collect your (or your child's) name, username, email address, phone number, physical address, and the contents of your communication which can include any information you (or your child) chooses to provide. We will only use that information for the purpose of providing the service or support requested.

- **Information collected when registering for a competition, special event (such as our online Master Workshops), signing up to receive newsletters from us, subscribing to our blog, or completing a survey.** When you engage in any of these types of activities, we may collect your name, email address, and phone number as well as your child's name, age, grade level, past programming experience, and any information you provide to us as part of that request (such as information about your user experience in response to a survey).
- **Information collected through user-generated content.** We collect any information that your child provides to us when he or she creates projects, writes comments, or posts on forums accessible to other TCS students and instructors. This information includes the student's username, the contents of his or her code, the output of the code, the name s/he gives to the project, and any other information s/he chooses to include.
- **Inviting others to use TCS.** Our Service may allow you to invite others to use TCS. If you do this or are invited in this way, we will collect and store the invitee's email address in order to enable us to send an invitation. We will also let the invitee know who invited them to use TCS and let him/her request that his/her information be deleted from our systems.
- **Information collected when you scan your badge or otherwise leaving your details with us a trade show or other marketing event.** In these circumstances, we may collect details such as your name, company name, job title, address, phone number, and email address.
- **Information collected when you apply to work with us.** If you apply to work with us, we will collect any information you choose to share in your



application, including your name, email address, phone number, physical address, employment history, and education history.

Information we collect automatically when you use our Service: We also collect certain information automatically as you navigate our Service.

- **Log Data.** Like many websites, TCS’s website collects certain information automatically and stores it in log files. This may include information about the devices you use to access our Service (including your internet protocol (IP) address, browser type, and operating system); the address of the web page visited before and after using our Service; details about your interactions with our Service (such as the date, time, length of stay, and specific pages accessed during your visits); search terms used to reach our Service; and usage information (such as the number and frequency of visitors to our Service). We use this information to help us design and administer our website, improve our Service, and gather broad demographic information that helps us identify visitor preferences.
- **Student Activity Data.** We also collect certain information about students’ activity on the TCS Portal. For instance, we collect information about when a student is working on a project or whether a student has completed a particular video in order to help our instructors monitor how a student is progressing throughout the week and to help TCS improve its Service.
- **Cookies.** We collect some of the information above using cookies and similar technologies. A “cookie” is a text file that websites send to a visitor’s computer or other internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. TCS uses cookies and user session data to remember whether you are logged in, ensure that the Site functions properly, determine how many users have visited certain pages, and prevent fraud. You can disable cookies, limit the types of cookies you allow, or set your browser to alert you when cookies are being sent. Please refer to the guidance offered by your chosen web browser if you’d like help managing your cookie preferences.



- **Analytics.** We also use third-party analytics tools to execute and track display advertising, including remarketing advertising on other websites. These tools help TCS understand which ads bring users to our site and inform and optimize the ads served.
Information we collect from other sources
- **Payment Processors.** In general, when you purchase classes from TCS, your payment card information is provided directly to our third-party payment processor, Stripe, and TCS does not collect or store that information. However, we may receive limited information about your payment card from Stripe, such as the last four digits of your card, the country of issuance, and the expiration date.
- **Publicly Available Sources and Other Third Parties.** We may obtain Personal Information about you from other sources, including public records, publicly available information on internet sites, and third parties that help us update, expand, and analyze our records and inform our marketing and recruitment efforts. For instance, we may use information from LinkedIn or from a third party data provider to update information about you in our contact database.
- **Another TCS User.** We may collect your Personal Information from another TCS user if that user provides us with your email address in order to invite you to try TCS.
- **TCS Instructors.** We also collect information relating to your child from our instructors. For instance, instructors provide session notes about the classes they are leading and may provide specific notes about individual students' learning styles and habits. They may also provide feedback on students' performance directly to students and their parents.

We may combine the information we collect about you from these various sources. If a combination of information that we collect identifies you as an individual, we will treat the combined information as Personal Information.



How We Use Your Information

We use the information described above to:

- Provide you with the Service if you are or become a TCS customer, including creating your TCS account and identifying you when you sign in to your account;
- Deliver a high-quality and customized learning experience;
- Process your purchases through our Service;
- Operate and improve our Service, including monitoring and analyzing usage, trends, and activities related to the Service;
- Send you technical notices, updates, security alerts, and support and administrative messages and information about the rules of the Site and Service;
- Identify, fix, and troubleshoot bugs and service errors;
- Respond to your requests, inquiries, comments, and suggestions;
- Communicate with you about products, services, offers, promotions, and events we offer and provide news and information we think will be of interest to you;
- Post testimonials from parents;
- Create student spotlights, publish the names of high performance or recognize achievements;
- Send your child certificates or TCS merchandise;
- Improve our educational, networking, marketing, social, and recruitment strategies;
- Assess job applicants and make hiring decisions;
- Protect against, identify, investigate, and respond to misuse of our Service or other unlawful behavior; and
- Carry out any other purpose described to you at the time the information was collected.



We do not use Personal Information to engage in targeted advertising to children and we do not create or build personal profiles of students other than for educational purposes or as specifically authorized by a parent or legal guardian.

How We Share Your Information

We may share information about you with certain third parties in the following circumstances:

- **Companies under common control:** We may share data between and among any current or future parents, subsidiaries, affiliates, and other companies under common control and ownership with TCS.
- **Vendors and service providers:** We may share Personal Information with vendors, consultants, and other service providers who need to access the data in order to perform services on our behalf, such as providing cloud-hosting or cloud-storage services.
- **Business transfers:** We may share Personal Information with another company in connection with or during negotiations of any merger, acquisition, financing, re-organization, bankruptcy, sale of all or a portion of our assets, or transition of services to another provider.
- **Legal requirements:** We may share Personal Information when we believe it is necessary to comply with a legal obligation, including lawful requests from public authorities to meet national security or law enforcement requirements. We may also share Personal Information when we believe it is necessary to protect TCS's rights and property, to protect the safety of our users, and to defend against legal liability.
- **Consent:** We may share Personal Information with third parties with your consent and at your direction, including if we notify you that the information you provide will be shared in a particular manner and you provide that information.



- **TCS Instructors:** In the course of providing our Service, we also share Personal Information about students with our instructors to enable instructors to communicate with students and to assist instructors in understanding each student's individual needs and capabilities.
- **Social Media Platforms:** Our Service may offer social sharing features and other integrated tools such as widgets, which allow students to share information from their TCS account with third-party social media platforms like Facebook or Twitter. Using these social sharing features is optional.
- **Public Forums and Publicly Available Content:** We offer several features that allow our students to connect and share content in public or semi-public spaces. Students do not have to use these features, but if they do, they should be sure to use good judgement. Certain information in students' profiles such as their username and photo or avatar, the projects they choose to share, and any other information they disclose in the public or semi-public areas of TCS's Service, may be read, collected, stored, or used by others.

We may also share aggregate or de-identified information, which cannot reasonably be used to identify you, for various purposes including compliance with various reporting obligations; for research purposes; for business or marketing purposes; or to assist third parties in understanding our users' interests, habits, and usage patterns for certain programs, content, services, advertisements, promotions, and/or functionality available through the Service.

Our Legal Bases for Handling Your Personal Information

The laws in some jurisdictions require companies to tell you about the legal grounds they rely on to use or disclose your Personal Information. To the extent those laws apply, our legal grounds are as follows:



- **Legitimate interest.** In most cases, we handle Personal Information on the ground that it furthers our legitimate interests in commercial activities such as the following in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals:
 - Providing the Service pursuant to our contract with our customers o Marketing our business
 - Protecting our customers, personnel, and property
 - Analyzing and improving our business
 - Processing job or other applications
- **Legal compliance.** We need to use and disclose Personal Information in certain ways to comply with our legal obligations.
- **To honor our contractual commitments to an individual.** Some of our processing of Personal Information is to meet our contractual obligations to the individual to whom the Personal Information pertains.
- **Consent.** Where required by law, and in some other cases, we handle Personal Information on the basis of implied or express consent. For instance, in relation to direct marketing, we will obtain and rely on your consent in relation to the processing concerned.

Your Rights and Choices

You have a variety of rights and choices related to our use of your Personal Information.

- **Opting out of email marketing.** You can opt out of receiving our promotional emails at any time by following the instructions included in those emails. Please be aware that it may take up to 10 days for us to process your request, and you may continue receiving promotional communications from us during that period. If you opt out of receiving such communications, please note that we may continue to send you non-



promotional emails (such as emails related to our business relationship or emails about changes to our legal terms).

- **Restricting cookies/Do Not Track.** TCS does not change its behavior in response to web browser “do not track” signals. However, you can configure most browsers to reject cookies or to notify you when you are sent a cookie, giving you a chance to decide whether or not to accept it. You can consult the help section of your browser to find out how to do this. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Service.
- **Limiting Information in Your TCS Profile.** You can control the information we collect about you or your child by limiting what information you provide in your TCS profile.
- **Limiting Information Available Through Social Media Platforms.** If you want to limit or stop receipt of information from third-party social media platforms, you can change your privacy settings on those other websites. You also may choose not to use social features we make available.
- **Access, Update, or Delete Your Information.** If you are already a TCS user, you may access, update, or delete Personal Information you have provided through your account settings or by emailing us at info@the-cs.org. Please include “Access, Update, or Delete Information” in the subject line of your email. You may also remove certain optional information that you no longer wish to be publicly available through the Service, such as your photo or avatar. If you no longer wish to use the Service, you may close your account. To learn how to close your account, please email info@the-cs.org. Please include “Close Account” in the subject line of your email. Please note that we may keep certain Personal Information as necessary to comply with our legal obligations or for legitimate business purposes, such as to resolve disputes or enforce our agreements. We may also keep cached archived copies of Personal Information for a certain period of time.



- **Data Requests.** In some instances you may be eligible to request that we provide access to and/or a copy of certain Personal Information we hold about you; ask that your Personal Information be corrected, updated, or erased; object to our processing of your Personal Information; request that we restrict certain processing; transfer your Personal Information to a third party; or honor your withdrawal of consent for certain processing of your Personal Information. We will consider all requests and provide our response within the time period stated by applicable law. Please note, however, that certain information may be exempt from such requests in some circumstances, which may include if we need to keep processing your information for our legitimate interest or to comply with a legal obligation. Before responding to your request, we may require that you provide us with additional information to confirm your identity. You have the right to lodge a complaint with the authorities applicable to your situation. However, we invite you to contact us with any concern, as we would be happy to try to resolve it directly.

If you are a resident of California, California law requires us to disclose the following information with respect to our collection, use, and disclosure of your Personal Information.

- **Notice of Collection.** Although the information we collect is described in greater detail in the “Information We Collect” section above, the categories of Personal Information that we have collected – as described by the CCPA – including in the past 12 months are:
 - Identifiers, such as name, email address, mailing address, and IP address. We collect this information directly from you or from thirdparty sources.
 - Other individual customer records, such as phone number, billing address, and payment card information. This category includes personal information protected under pre-existing California law



(Cal. Civ. Code § 1798.80(e)), and overlaps with other categories listed here.

- Commercial information, such as purchasing information and engagement with our Service. We collect this information directly from you.
 - Demographic information, such as age. We collect this information directly from you.
 - Internet activity, such as referring and exiting pages and your interactions with our Service. We collect this information directly from your device.
 - Geolocation data, such as IP address. We collect this information directly from your device.
 - Financial Information, such as payment information or financial account numbers in order to provide you with services. We collect this information directly from you.
 - Employment information, such as company name and job title. We collect this information directly from you.
 - Sensory information, such as photos.
 - Inferences, such as information about your interests and preferences.
- **Business or Commercial Purpose for Collecting and Using Personal Information.** We collect each category of Personal Information listed above for the business or commercial purposes described in the “How We Use Your Information” section above.
 - **Categories of Sources of Personal Information.** We collect each category of Personal Information listed above directly from you, through automatic data collection means, or through the third-party sources described in the “Information We Collect” section above.
 - **Categories of Personal Information Disclosed.** In the preceding 12 months, we have disclosed the categories of Personal Information listed above in



the circumstances described in the “How We Share Your Information” section above.

- **Categories of Third Parties With Whom We Share Personal Information.** We may share each category of Personal Information listed above with the third parties described in the “How We Share Your Information” section above.
- **Right to Know.** California residents may request disclosure of the specific pieces and/or categories of Personal Information that we have collected about them, the categories of sources for that Personal Information, the business or commercial purposes for collecting the information, the categories of Personal Information that we have disclosed, and the categories of third parties with which the information was shared. To request this information please contact us at info@the-cs.org.
- **Right to Opt-Out.** TCS does not sell Personal Information to third parties for monetary value. However, the term “sale” is defined broadly in the CCPA. To the extent that “sale” under the CCPA is interpreted to include any of the data uses described in the “How We Use Your Information” section above, California residents are entitled to opt out of the “sale” of data at any time.
- **Deletion.** You may request that we delete the Personal Information we have collected about you (subject to certain exceptions). Please be aware that we may keep certain information as required or permitted by applicable law. To exercise this right, please contact us at info@the-cs.org or using our contact information below.
- **Authorized Agent.** You may designate an authorized agent to make a request on your behalf. To do so, you must provide a valid power of attorney, the requester’s valid government-issued identification, and the authorized agent’s valid government-issued identification. To verify the request, we may contact you directly.
- **Right to Non-Discrimination.** Limiting use of, or deleting, your Personal Information may affect features and uses that rely on that information.



However, we will not discriminate against you for exercising any of your rights, including denying you goods or services, providing you with a different level or quality of services, or charging you different prices or rates for services.

- **Shine the Light.** California Civil Code § 1798.83, also known as the “Shine The Light” law, permits California residents to request and obtain from us, once a year and free of charge, information about categories of Personal Information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared Personal Information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

Children’s Privacy

Many features of our Service are intended for adults, including parents or legal guardians and instructors. We do not knowingly collect Personal Information from children in connection with these features. If you are a parent or legal guardian and think your child under the age of 13 (or a higher age threshold where applicable) has given us Personal Information without your consent, please contact us at info@the-cs.org.

When we do intend to collect Personal Information from children, we take additional steps to protect children’s privacy, including:

- Notifying parents about our information practices with regard to children, including the types of Personal Information we may collect from children, the uses to which we may put that information, and whether and with whom we may share that information;



- In accordance with applicable law, and our practices, obtaining consent from parents for the collection of Personal Information from their children, or for sending information about our products and services directly to their children;
- Limiting our collection of Personal Information from children to no more than is reasonably necessary to participate in an online activity; and
- Giving parents access or the ability to request access to Personal Information we have collected from their children and the ability to request that the Personal Information be changed or deleted.

Links to Other Websites and Third-Party Content

We may provide links to third-party websites, services, and applications that are not operated or controlled by TCS. This Privacy Policy does not apply to the privacy practices of those third parties. The fact that we link to a website, service, or application is not an endorsement, authorization, or representation of our affiliation with that third party. We encourage you to review the privacy policies of any third party service before providing any Personal Information to or through them.

Data Transfer

Personal Information we collect may be stored and processed for the purposes set out in this Privacy Policy in the United States where we are based or in any country where we have operations or where we engage vendors or service providers. These countries may not have the same data protection laws as the country in which you originally provided the data. By using our Service or submitting your Personal Information to us, you agree to such transfers. Where Personal Information is transferred outside the European Economic Area to a third party in a country that is not subject to an adequacy decision by the EU Commission, we take appropriate steps to



provide the same level of protection for the processing carried out in any such countries as you would have within the EEA to the extent feasible under applicable law. If you would like a copy of the relevant mechanism we use to transfer Personal Information outside of the EEA, please contact us at info@the-cs.org.

Data Retention

We only keep your Personal Information for so long as reasonably necessary for the purposes described in this Privacy Policy, as required by law, or as necessary to resolve disputes and enforce our rights and agreements. To dispose of Personal Information, we may anonymize it, delete it, or take other appropriate steps. Data may persist in copies made for backup and business continuity purposes for additional time.

Security

TCS uses generally accepted administrative, physical, and technical safeguards we believe are appropriate to protect the confidentiality, integrity, and availability of your Personal Information. Although we make reasonable efforts to protect Personal Information from loss, misuse, or alteration by third parties, you should be aware that there is always some risk involved in transmitting information over the Internet and storing information electronically. TCS cannot and does not guarantee absolute security.

Changes to Our Privacy Policy

We may change this Privacy Policy from time to time to reflect changes in our practices or in the law. If we make changes to this policy, we will post the updated Privacy Policy on our website and indicate when it was last



revised. You are advised to review this policy periodically to stay informed of our practices. If we make material changes, we may provide you with additional notice, such as posting a statement on our homepage or sending you an email notification, if we have your email address on file. Your continued use of the Service after the revised Privacy Policy has become effective indicates that you have read, understood, and agreed to the current version of this Privacy Policy, to the extent permitted by law.

Contacting Us

If you have any questions about our Privacy Policy or how we protect your Personal Information please contact us at info@the-cs.org or write us at 3940 Laurel Canyon Blvd. Suite 153, Los Angeles, CA 91604.