

Updated: August 09, 2023

## **1. Introduction**

This privacy policy (the “**Privacy Policy**”) is designed to help you better understand how we at Rewriting the Code, Inc (“**RTC**”) use Personally Identifiable Information gathered from all our hosted services and subdomains of [rewritingthecode.org](https://rewritingthecode.org) (collectively referred to as “**Website**”), and through our provision of services to our members, company and industry partners, donors.. Users of the services are referred in this Privacy Policy as “**you**” and “**your**”.

We will ensure that all Personally Identifiable Information disclosed by you and that is held by us will be: (i) processed lawfully, fairly, and in a transparent manner; (ii) collected for specified, explicit, and legitimate business purposes and not further processed in a manner that is incompatible with those legitimate business purposes; (iii) adequate, relevant and limited to what is necessary; (iv) kept in a form which permits identification of data subjects for no longer than is necessary; and (v) processed in a manner that ensures appropriate security of the Personally Identifiable Information, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

In the UK, RTC acts as a “**data controller**” of your Personally Identifiable Information, which means we decide how and why your Personally Identifiable Information is processed for the purposes of UK data protection rules (the “**UK Data Protection Laws**”).

We publish the current version of this Privacy Policy on our Website, and we may update this from time to time. We will alert you (e.g., by way of e-mail) of updates where:

- We are making substantial changes; or
- We are doing something with your Personally Identifiable Information which you might not expect based on what we have told you in this Privacy Policy.

Some of our websites may contain content and links to other websites operated by third parties. We do not control these third-party websites/apps (including whether they store cookies) and this Privacy Policy does not apply to them. You are advised to consult the privacy policies of the relevant third-party website or app to find out how they use your information.

## **2. Contact Information**

If you have a question on this Privacy Policy or how we use your Personally Identifiable Information, please email [data@rewritingthecode.org](mailto:data@rewritingthecode.org) or write to us at Rewriting the Code, Inc., 2401 Cranford Rd, Durham NC 27705-1011, Attn: Data Team

For UK data subjects, if you are not satisfied with the way that we have treated your Personally Identifiable Information or responded to your rights request, you have the right to lodge a complaint with the Information Commissioner's Office. Find out on their website how to report a concern at [ico.org.uk/concerns/](https://ico.org.uk/concerns/). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **3. Personally Identifiable Information**

We may collect, hold and use the following Personally Identifiable Information from or about you (either submitted directly by you or received from third party industry partners). Some of these are optional or depend on Rewriting the Code’s obligations.

### **3.1 Automatically Collected Data**

- Usage data about your use of the Website: this may include the number and frequency of visitors to this Website and what features of the Website are most popular to our visitors. This

information may include which URL you just came from, which URL you next go to, what browser you are using, what features you click on and read (in whole or in part), cookies, and your IP address.

- Data about your use of the Website through a mobile device: this may include information about your use of the Website through your mobile device and mobile communications carrier, including, but not limited to, the identity of your mobile carrier, your mobile device, and your physical location. Use of the Website through a mobile device will cause data to be displayed and transmitted through your mobile device.

We use such data only in the aggregate. This collective data helps us to determine how much our visitors use parts of the Website and services, and to do internal research on our users' demographics, interests, and behavior, so as to better understand and serve members. We may share such aggregate information with third parties, for further information on this please see the "*Sharing Information*" below.

### **3.2 Other Collected Data**

- Contact details: this may be collected when you voluntarily complete the "Contact Us", "Donate to Us", "Become a Partner", "Become a Member" or "Become a Fund Contributor" form on the Website, and includes your phone number, birthdate, home address and email address.
- Identity details: this may include your first name, maiden name, last name and gender.
- Demographic information: this may include your preferred pronouns, geographic location, hometown (inclusive of city, state, and country), and your race/ethnicity.
- Financial information: this may include your bank/credit card details and other financial information.
- Educational/Professional Background and Interests: this may include your majors or areas of study, name of university, graduation dates, job title, place of work, and personal interests (including but not limited to tech interests, industry interests, and other personal interests), and skills that you might possess.

### **4. How and why we use your Personally Identifiable Information**

We seek such information primarily for the legitimate business purpose of granting you membership to our online community and allowing you access to our resources and opportunities available through our online community. In addition, we may use such information for the legitimate business purposes of improving our marketing and promotional efforts, analyzing Website usage, improving our content and service offerings, and customizing our Website's content, layout and services.

Under the UK Data Protection Laws, we are required to explain what information we collect from you and how and why we use your Personally Identifiable Information (the "**processing activity**"). We are also required to have a "**lawful basis**" on which to process this data. Our legal basis for collecting and using your Personally Identifiable Information will depend on the Personally Identifiable Information concerned and the specific context in which we collect/use it. We will normally collect Personally Identifiable Information in order to perform a membership contract with you. In addition, we may collect Personally Identifiable Information where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect Personally Identifiable Information from you or may otherwise need the Personally Identifiable Information to protect your vital interests or those of another person. We may also send you service communications (for example, to inform you of changes to our terms or policies, our services or other important notices) where it is in our legitimate interest to do so. In certain limited circumstances, we may also ask for your consent to process your Personally Identifiable Information.

### **5. Social Networking Sites**

RTC operates and maintains social networking pages and venues on websites such as Facebook, Twitter, Instagram and LinkedIn. These social networking sites are not controlled by RTC and RTC does not endorse or make any representations about third party websites or social networking sites. RTC will, from time to time, import comments and posts from these third-party websites for the Website. If you post to any of RTC's social networking pages on third-party websites, you are providing information to the public and do so at your own risk. Further, RTC may use these postings on its Services without further notice or compensation to you. Please visit the privacy policies of any third-party websites including social networking sites before posting to RTC's pages there.

## **6. Cookies, pixels, and other system technologies**

"Cookies" are files with a small amount of data which is sent to a user's browser from a web server and stores on a users computer, mobile phone or other device.

"Pixels" (also called clear GIFs, web beacons, or pixel tags) are small blocks of code on webpages that do things like allow another server to measure viewing of a webpage and often are used in connection with cookies.

We use technologies like cookies, pixels and local storage (like on your browser or device, which is similar to a cookie but holds more information) to provide customized services and information that is targeted to your interests. For example, we use these technologies to tell us how and when pages in our website are visited, what our users' technology preferences are (such as what type of video player they use) and whether our website is functioning properly. We also use these technologies to temporarily retain the information you enter into a form. In some jurisdictions, such as the UK, we are not permitted to send cookies to the browser without the prior consent of the affected user. In this case, we will seek such consent.

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is set. (Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.) You are always free to decline our cookies if your browser permits, although in that case you may not be able to interact with certain features on our website, and you may be required to re-enter your password more frequently during a session.

Additionally, you may encounter cookies or other similar devices on our website that are placed by third parties. We do not control the use of cookies by third parties.

## **7. Transfers of Personally Identifiable Information**

RTC, and those with whom it shares information (the "Recipients"), may disclose and transfer your information worldwide, including in and outside the United States, the European Economic Area, Canada, and other jurisdictions serviced by RTC, for any purpose relating to RTC's operations.

For UK data subjects: When we do this, appropriate technical and legal safeguards are put in place to ensure you are afforded a similar level of protection as within the UK and the EEA including:

- only transferring your Personally Identifiable Information to countries that have been deemed to provide an adequate level of protection for Personally Identifiable Information; and
- using specific contracts approved for use in the EEA and/or the UK which give Personally Identifiable Information the same protection it has in the EEA and/or UK as appropriate.

## **8. Security and Storage**

We maintain commercially reasonable administrative, technical, and physical safeguards (which vary depending on the sensitivity of the Personally Identifiable Information) designed to protect against unauthorized use, disclosure, or access of Personally Identifiable Information. You should be aware, however, that "perfect security" does not exist on the Internet, and that third parties may be able to

intercept private communications and/or access your Personally Identifiable Information. We cannot ensure or warrant the security of any information you provide to us.

RTC ensures that Personally Identifiable Information is safeguarded against loss, access, use, modification, disclosure, or other misuse. All reasonable steps are taken to prevent unauthorized use or disclosure of your Personally Identifiable Information including but limited to firewalls, virus scan tools, encryption, training on cybersecurity for all employees, and role-based access restrictions.

RTC will retain your Personally Identifiable Information only for as long as necessary to fulfill the legitimate business purpose(s) for which it was collected and/or to comply with applicable laws. Our data retention periods vary depending on the nature and context of the Personally Identifiable Information that we have in our care and are calculated taking into account the following factors:

- guidance from official bodies such as the ICO;
- how long we need to keep the information to fulfil the original purpose for which it was collected;
- legal obligations to which we are subject; and
- when it is no longer legally required or where we no longer have a legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **9. Sharing Information**

In general, we will not sell, share, or rent information about you in ways different from what is disclosed in this statement. We may share your information with our affiliates and third-party service providers, this includes the following:

- Company partners and industry partners
- Government entities
- Private parties
- Payment service providers
- Business IT service providers including providers of hosting services
- Our professional advisers
- Marketing service providers

We require all third parties to respect the security of your Personally Identifiable Information and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personally Identifiable Information for their own purposes and only permit them to process your Personally Identifiable Information for specified purposes and in accordance with our instructions.

Information that you provide that makes up your profile may be searchable by other members of the RTC community and may also be viewed by such members. We may also share your information with our company partners and industry partners who may be looking to hire from our members. For clarity, you have the ability to choose which information you wish to share with other community members and our company and industry partners.

We may be forced to disclose information to the government or third parties under certain circumstances. We cooperate with governments and private parties to enforce laws such as those regarding intellectual property rights, fraud, data privacy and security. We can (and you authorize us to) disclose any information about you to government officials and private parties as we, in our sole discretion, believe necessary or appropriate in connection with an investigation of fraud, intellectual property infringement or other activity connected to this website that is illegal or may expose us or you to liability.

We use outside service providers to facilitate RTC's Website and overall operation, and to perform functions on our behalf, such as sending emails, text messages, analyzing data, processing payments and providing customer service. These third parties may have access to your Personally Identifiable Information as needed to perform their functions, but they may not use it for any other purpose

## **10. Individual Rights**

### **10.1 EU/EEA and UK Citizens**

The EU General Data Protection Regulation ("EU GDPR") and UK Data Protection Laws grant individuals who are in the European Union, European Economic Area (EU/EEA) and the UK certain rights, with some limitations. If you wish to exercise any of your rights outlined below, please contact us on [data@rewritingthecode.org](mailto:data@rewritingthecode.org) or using the information provided in the "Contact Us" section above.

Your rights are as follows:

- **Right to access your Personally Identifiable Information:** You have the right to know if your Personally Identifiable Information is being held, what categories of data are held, and to receive a copy of all data about you.
- **Right to restrict or object to processing:** You can object to processing if it could affect your rights, freedoms or interests. For example, you have the right to object to direct marketing and automated decision-making (although we do not engage in the latter).
- **Right to data portability:** We will provide your data in a portable format.
- **Right to data rectification:** You have the right to request that we rectify your Personally Identifiable Information if it is not accurate or not complete.
- **Right to data erasure:** You have the right to ask us to erase or delete your Personally Identifiable Information where there is no reason for us to continue to process your Personally Identifiable Information.
- **Right to withdraw consent:** You have the right to withdraw your consent where we are relying on it to use your Personally Identifiable Information.

Note that if you exercise your right to remove your details, to restrict processing or to object, this may adversely affect your ability to obtain our services.

### **10.2 California Residents**

The California Consumer Privacy Act (CCPA) provides California consumers with the right to request access to their personally Identifiable Information, additional details about our information practices and deletion of their Personally Identifiable Information (subject to certain exceptions). California consumers also have the right to opt out of sales of Personally Identifiable Information, if applicable. We describe how California consumers can exercise their rights under the CCPA below. Please note that you may designate an authorized agent to exercise these rights on your behalf by providing written materials demonstrating that you have granted the authorized agent power of attorney. Please note that if an authorized agent submits a request on your behalf, we may need to contact you to verify your identity and protect the security of your Personally Identifiable Information. We will not fulfill your CCPA request unless you have provided sufficient information for us to reasonably verify you are the consumer about whom we collected Personally Identifiable Information. We will not discriminate against you if you choose to exercise your rights under the CCPA.

You may request, no more than twice in a twelve (12) month period, access to the specific pieces of Personally Identifiable Information we have collected about you in the last twelve (12) months. You may also request additional details about our information practices, including the categories of Personally Identifiable Information we have collected about you, the sources of such collection, the categories of Personally Identifiable Information we share for a legitimate business or commercial purposes, and the categories of third parties with whom we share your Personally Identifiable Information. You may make

these requests by contacting using the contact information provided below in the “Contact Us” Section below. After submitting your request, please monitor your email for a verification email. We are required by law to verify your identity prior to granting access to your data in order to protect your privacy and security.

You may request, no more than twice in a twelve (12) month period, transportable copies of your Personally Identifiable Information that we have collected about you in the last twelve (12) months. You may make these requests by contacting using the contact information provided below in the “Contact Us” Section. After submitting your request, please monitor your email for a verification email. We are required by law to verify your identity prior to granting access to your data in order to protect your privacy and security.

You may request that we delete the Personally Identifiable Information we have collected about you. Please note that we may retain certain information as required or permitted by applicable law. You may make these requests by contacting us using the contact information provided below in the “Contact Us” Section below. After submitting your request, please monitor your email for a verification email. We are required by law to verify your identity prior to granting access to your data in order to protect your privacy and security.

California residents are entitled to ask us for a notice identifying the categories of Personally Identifiable Information which we share with our affiliates and/or third parties for marketing purposes and providing contact information for such affiliates and/or third parties.

If you would like to exercise your rights under CCPA, please submit a request to [data@rewritingthecode.org](mailto:data@rewritingthecode.org) or using the information provided in the “Contact Us” section above.

### **10.3 Aggregate and De-Identified Data**

Please note that we may still use any aggregated and de-identified Personally Identifiable Information that does not identify any individual and may also retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

### **11. Do Not Track**

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

### **12. Policy Towards Children**

Given the nature of our Website and our services, we do not knowingly collect Personally Identifiable Information relating to children. We are concerned about the safety and privacy of children who use the Internet. We encourage the viewing of our website by children to be done with parental supervision. Consistent with the Children’s Online Privacy Protection Act of 1998 (“COPPA”), we will never knowingly request Personally Identifiable Information from anyone under the age of 13 without prior verifiable parental consent. If we become aware that a child under 13 has provided us with Personally Identifiable Information without verifiable parental consent, we will use our best efforts to remove such information from our files. If a parent or guardian becomes aware that his or her child has provided us with Personally Identifiable Information without verifiable parental consent, he or she should contact us at [data@rewritingthecode.org](mailto:data@rewritingthecode.org).

### **13. Email, Text, Communications**

We wish to send you marketing communications for services that may be relevant to you. We may also need to send you communications that are not direct marketing communications (service communications) from time to time. Service communications relate to information that is necessary for us to convey.

We may contact you by email, text, and send you newsletters. To stop receiving our communications and “opt-out”, you can follow the unsubscribe instructions (via the unsubscribe link at the foot of the message) or contact us as described in the “Contact Us” Section below. We will process your request within a reasonable time after receipt, in accordance with applicable laws. Note that you will continue to receive transaction-related emails regarding products or services you have requested.

#### **14. Governing Law**

Your use of this website, our products, this Privacy Policy and any disputes relating thereto shall be governed in all respects by the laws of the State of North Carolina. Any dispute relating to this Privacy Policy shall be resolved solely in the state courts located in Durham, North Carolina.

Thank you for visiting our website. If you have any questions about our website or our Privacy Policy, please contact us at: [data@rewritingthecode.org](mailto:data@rewritingthecode.org)