Education Assessment

✓ **Educational value has been assessed**
Comments: (i.e. strengths, limitations, best practice suggestions)

Code.org offers a fun, creative platform for learning basic coding and computer science! Computer Science Fundamentals courses teach students computational thinking, problem solving, programming concepts and digital citizenship. Teachers can assign lessons or students can create individual projects in the different Labs.Teachers create student accounts with an alias and invite them with a class code. Age is requested to limit sharing options for students under 13. Teachers can disable sharing abilities for older students too.

Preliminary Privacy Impact Assessment

Digital resource	Code.org https://code.org/privacy/student-privacy https://privacy.commonsense.org/evaluation/code.org
Does a PIA exist? (Vendor, ERAC)	No
Is there a 'data link' (e.g.. Pulling PI data from one source to another)?	No
Describe how PI is (requires examining TOU and Privacy Policy)	
Collected What PI data is collected? List all the PI that could be collected from students, teachers, parents through using the service	• Student display name (e.g. "John S" or "Cool coder") - Display names are not necessarily real names. • Account Identifiers - system generated based on display name • Age (to protect the privacy of the youngest learners) • Progress in the course (to display reports for students and teachers) • Login date/time and other technical information (for debugging purposes) • Scrambled "hash" of email address. If a student creates an account directly (without a parent or teacher), they will login using their email address, but Code.org will never receive the actual email address, only a scrambled "hash" that can't be converted back to the original. • Parent email address if parent creates the child's account

	- Gender or race (to anonymously summarize aggregate participation in computer science, to track progress towards increasing diversity in the field). - Student projects created in course progression or standalone. - Student-uploaded images, sounds, or videos for their creations. - Student-provided responses to surveys If you register for a Code.org account through an authentication service (such as Google Accounts, Microsoft Accounts, Facebook Connect, Clever, or PowerSchool), you give Code.org permission to store and use information already associated with your authentication service consistent with this Privacy Policy and the table above. In these instances, Code.org only receives information from the authentication services - Code.org does not share information with such services. Student and Teacher profiles cannot be customized with a photo.
Used What is the PI used for? Will PI be used to make decisions that directly affect individuals? Does the company use the PI to advertise its services or those of other companies to students, teachers or parents?	Personal information is kept secure and is never sold or shared. Display name is used to provide Students a welcoming login and to identify the Student in the Teacher's view of student progress. We recommend using first names only to increase privacy. Usernames are generated based on the initial display name and can be used along with a password to sign into an account. Age is used to understand the developmental stage of Students in order to offer an age-appropriate experience for each Student. We also use this field to ensure we don't allow Students under age 13 to access age-restricted features (such as sharing their coding projects on social media). We store ages (e.g., 16), as opposed to birth dates . Student projects and code creations each have a custom URL that Students can use to share with others, or post to the Code.org public gallery. On the public gallery, projects are displayed with only the first letter of the Student's display name
Disclosed Who will/can have access (vendor, partners, legal)?	We do not rent or sell personal data or any other information that we collect from Users, or exploit it for financial gain in any other way. Code.org will never share or grant rights to personal data with other third-party organizations to use without your consent Code.org may use a variety of third-party service providers to support our operations. We may share or publish de-identified or aggregate data about Students, Teachers, and our Services for various purposes.
Secured Measures in place to secure – encryption, passwords, software and	Code.org uses physical, administrative, and technical safeguards designed to reasonably protect the confidentiality, availability, integrity, and security of personal data and other information we collect and maintain in connection with the Services. These

platform updates, independent testing for security	safeguards include, for example, restrictions on physical access to the data center, hardened system configuration, two-factor authentication, patch management, disaster recovery processes, employee security and privacy training, employee background checks, and third-party security resources, among others. We encrypt Personal Information in transit and at rest, and we have generally aligned our security practices to the NIST Cybersecurity Framework.
Stored Where is the data being stored? - What hosting providers are being used? - What hosting region(s) are data being stored in?	operated and managed on servers located within the United States
Kept Accurate	If you wish to access, amend, or delete your personal data on the Code.org learning platform, you may do so from your Code.org account settings page
Retained Expiry, deletion, backup/restore - How are requests made by students, teachers, parents, district staff for data to be: Deleted, Downloaded - What are the retention policies (not, e.g., 1 yr retention if PI used to make decisions that affect individuals)	Except as described below, personal data of any Student that is in a Teacher's section will be under the control of the Teacher. The Teachers for these sections get access to the Student's course progress and display name, but not their email address. If a Student is no longer associated with a Teacher's section, that means the Student's account will no longer be managed by the Teacher and the Student may retain possession and control of the Student-Generated content by creating a personal email login. If a Teacher deletes their own Teacher account (and all sections under their account) or removes a Student from a section they manage, the Student account in the section will also be deleted unless the Student has created a personal email login for their Student account. If the Student has created a personal email login, the Student account will be removed from the Teacher's section but the Student account will not be deleted. A Student may want to create a personal login to access their account independently of their Teacher or school, especially if the Teacher decides to delete the classroom section that the Student belonged to or the Student signs in with a school-sponsored account like Google, Microsoft, Clever, or PowerSchool.
RECOMMENDATIONS ❏ Approve the application/extension	**COMMENTS** **No PII is shared about students -** - **The Code.org Services are designed for Users of all ages, including children under the age of 13 with the involvement of and pre-authorization by their school, teacher, parent or legal guardian.**

	<mark>We feel that even with this mention in the Privacy Policy, it does not apply to us as no Private information is collected</mark> • We expect Teachers who create Student accounts as part of a School's educational curriculum to represent that they or the educational organization have obtained any necessary parental consent to register a child under the age of 13.
Date submitted to IT/Privacy: 2021-05-17	**Decision / Date: June 28, 2021**