

# Codecademy Privacy Policy

This Policy was last updated April 5, 2022.

Codecademy LLC (“Codecademy,” “we,” “our,” or “us”) is committed to protecting your privacy. Our Privacy Policy (the “Policy”) explains how we collect, use, disclose, and protect information about you or associated with you (“personal information”), and your choices about the collection and use of your information. This Privacy Policy applies to the online services offered by Codecademy such as our website at [www.codecademy.com](https://www.codecademy.com), our mobile app Codecademy Go, and any other online service location (collectively the “Service”) that makes this Privacy Policy available to you.

By using the Service, you agree to our [Terms of Use](#) and consent to our collection, use and disclosure practices, and other activities as described in this Privacy Policy. If you do not agree and consent, discontinue use of the Service.

Depending on where you are located or reside, you may be entitled to additional rights.

1. If you are a data subject in the European Union, please see the “Additional Disclosures for People in Europe” section below;
2. If you are a California resident please see the “Additional Disclosures for California Residents” section below; and
3. If you are a Nevada resident please see the “Additional Disclosures for Nevada Residents” section below.

If you have any questions or wish to exercise your rights and choices, please contact us as set out in the “Contact Us” section.

# Information Collection

This section will discuss what type of information is collected. This includes categories of information that (1) you provide to us directly, (2) is collected by us automatically, and (3) we receive from third-party sources.

## 1. Information You Provide Directly to Us

You can browse our site without providing personal information, but you must register in order to access most of the features of Service. Certain personal information—such as a user name, email address—are required to create an account. However, after you set up an account, you may choose what additional information may be shared through public profiles, including your name, location, website, links to your social media profiles, and other information that may be considered personal information. Similarly, should you choose to engage in messaging through the Service, the contents of such messages may be processed and saved by us. You may choose to voluntarily provide other information to us that we do not request, and, in such instances, you are solely responsible for such information.

The following categories of information are collected from you:



[Log In](#) [Sign Up](#) 

**Contact Data**, including your first and last name, email address, postal address, and phone number.

**Account Credentials**, including your username, password, password hints, and information for authentication and account access.

**Demographic Data**, including your age, gender, and country.

**Billing Data**, including your payment instrument number (such as a credit or debit card number), expiration date, and security code as necessary to process your payments.

**Profile Data**, including your interests, inferences, preferences and favorites.

**Content**, including content within any messages you send to us (such as feedback and questions to customer support) or publicly post on the Service (such as in your public profile, in reviews, and comments) as well as any academic content that you generate

and submit for grading. We also collect content within any messages you exchange with other users through the Service (such as if you use our chat functionalities).

**Personal Contacts Data**, including the first and last name, email address, and phone number of your personal contacts. We collect data about your contacts with your consent and in order to fulfill a request by you, such as finding your contacts on the Service or inviting your contacts to join the Service. Such functionality is only intended for U.S. residents. By using this functionality, you acknowledge and agree that both you and your contacts are based in the U.S. and that you have your contacts' consent for us to use their contact information to fulfill your request.

**Job Applicant Data**, including your employment and education history, transcript, writing samples, and references as necessary to consider your job application for open positions.

You may choose to voluntarily provide other information to us, and, in such instances, you are solely responsible for such information.

## 2. Information Collected Automatically

In addition, we automatically collect information when you use the Service. The categories of information we automatically collect and have collected in the last 12 months includes:

**Service Use Data**, including data about features you use, pages you visit, emails and advertisements you view, products and services you view and purchase, the time of day you browse, and your referring and exiting pages.

**Device Data**, including data about the type of device or browser you use, your device's operating software, your internet service provider, your device's regional and language settings, and device identifiers such as IP address and Ad Id.

**Location Data**, including imprecise location data (such as location derived from an IP address or data that indicates a city or postal code level) and, with your consent, precise location data (such as latitude/longitude data).

We use various current – and later – developed tracking technologies to automatically collect information when you use the Service, including the following:

**Log Files**, which are files that record events that occur in connection with your use of the Service.

**Cookies**, which are small data files stored on your device that act as a unique tag to identify your browser. We use two types of cookies: session cookies and persistent cookies. Session cookies make it easier for you to navigate our website and expire when you close your browser. Persistent cookies help with personalizing your experience, remembering your preferences, and supporting security features. Additionally, persistent cookies allow us to bring you advertising both on and off the Service. Persistent cookies may remain on your device for extended periods of time, and generally may be controlled through your browser settings.

**Pixels** (also known as web beacons), which is code embedded in a website, video, email, or advertisement that sends information about your use to a server. There are various types of pixels, including image pixels (which are small graphic images) and JavaScript pixels (which contains JavaScript code). When you access a website, video, email, or advertisement that contains a pixel, the pixel may permit us or a separate entity to drop or read cookies on your browser. Pixels are used in combination with cookies to track activity by a particular browser on a particular device. We may incorporate pixels from separate entities that allow us to track our conversions, bring you advertising both on and off the Service, and provide you with additional functionality, such as the ability to connect our Service with your social media account.

**Device Fingerprinting**, which is the process of analyzing and combining sets of data elements from your device's browser, such as JavaScript objects and installed fonts, to create a "fingerprint" of your device and uniquely identify your browser and device.

**App Technologies**, which are technologies included in our apps that are not browser-based like cookies and cannot be controlled by browser settings. For example, our apps may include SDKs, which is code that sends information about your use to a server. These SDKs allow us track our conversions, bring you advertising both on and off the Service, and provide you with additional functionality, such as the ability to connect our Service with your social media account.

**Location-Identifying Technologies**, which are technologies used to collect your location. For example, GPS, WiFi, and Bluetooth may be used to collect precise location data when you consent to precise location tracking through our apps. Location data

may be used for purposes such as verifying your device's location and delivering or restricting relevant content and advertising based on that location.

For further information on how we use tracking technologies for analytics and advertising, and your rights and choices regarding them, see the "Analytics and Advertising" and "Your Rights and Choices" sections below.

## 3. Information From Other Sources

We also collect information from other sources. The categories of sources we collect information from including in the last 12 months, include:

Data brokers or resellers from which we purchase data to supplement the data we collect.

Social networks when you engage with our content, reference our Service, or grant us permission to access information from the social networks.

Partners that offer co-branded services, sell or distribute our products, or engage in joint marketing activities.

Publicly-available sources, including data in the public domain.

## Use of Information

This section discusses how collected information is used by Codecademy.

We collect this information for a number of business purposes including to operate, maintain, and provide to you the features and functionality of the Service, as well as to communicate directly with you, such as to send you email messages.

The categories with respect to our business purposes for using information, including in the last 12 months, include:

Operate and manage our Service, including your registration and account.

Perform services requested by you, such as respond to your comments, questions, and requests, and provide customer service.

Sending you technical notices, updates, security alerts, information regarding changes to our policies, and support and administrative messages.

Preventing and addressing fraud, breach of policies or terms, and threats or harm.

Monitoring and analyzing trends, usage, and activities.

Conducting research, including focus groups and surveys.

Improving the Service or other Codecademy websites, apps, marketing efforts, products and services.

Developing and sending you direct marketing, including advertisements and communications about our and other entities' products, offers, promotions, rewards, events, and services.

Conducting promotions, including verifying your eligibility and delivering prizes in connection with your entries.

Sending you advertising.

Fulfilling any other business or commercial purposes at your direction or with your notice and/or consent.

Notwithstanding the above, we may use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law. For information on your rights and choices regarding how we use information about you, please see the "Your Rights and Choices" section below.

## Sharing of Information

This section explains our sharing practices with respect to information collected.

We share information we collect in accordance with the practices described in this Privacy Policy. The categories of entities to whom we disclose and have shared information with in the last 12 months, include the following:

**Service Providers.** We share information with entities that process information on our behalf for our business purposes. Service providers assist us with services such as payment processing, chat functionality, data analytics, marketing and advertising, website hosting, and technical support. We may permit our service providers to use

information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law.

**Vendors and Other Parties.** We share information with vendors for business and commercial purposes, including analytics and advertising technology companies. Vendors may act as our service providers, or in certain contexts, independently decide how to process your information. For more information on advertising and analytics, see the “Analytics and Advertising” section below.

**Affiliates.** We share information with our related entities including our parent and sister companies for business purposes such as customer support, marketing, and technical operations. We also may share information with affiliates for commercial purposes.

**Corporate and School Customers.** We share information with our corporate customers and schools that purchase our Service in connection with us processing information on their behalf. For example, we share information with our corporate and school customers in order to facilitate your orders, maintain and administer your online accounts, provide feedback, academic content, and student performance data to account managers and instructors, respond to your questions and comments, provide support, comply with your requests, market and advertise to you, and otherwise comply with applicable law.

**Partners.** We share information with our partners (such as bootcamps, interview prep organizations, and employment marketplaces) in connection with offering co-branded services, selling or distributing our products, or engaging in joint marketing activities.

**Promotions.** When you voluntarily enter a sweepstakes, contest, or other promotion, we share information as set out in the official rules that govern the promotion as well as for administrative purposes and as required by law (e.g., on a winners list). By entering a promotion, you agree to the official rules that govern that promotion, and may, except where prohibited by applicable law, allow the sponsor and/or other entities to use your name, voice and/or likeness in advertising or marketing materials.

**Public Information.** We share information you make public through the Service, such as information in your profile or that you post on public boards or other public sections of the Service. Please think carefully before making information public as you are solely responsible for any information you make public. Once you have posted information, you may not be able to edit or delete such information, subject to additional rights set out in the “Your Rights and Choices” section below.



**Merger or Acquisition.** We share information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition or business combination of all or any portion of our assets, or transfer of all or a portion of our business to another business.

**Security and Compelled Disclosure.** We share information to comply with the law or other legal process, and where required, in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We also share information to protect the rights, property, life, health, security and safety of us, the Service or anyone else.

**Facilitating Requests.** We share information at your request or direction, such as when you choose to share information with a social network about your activities on the Service.

**Consent.** We share information with notice to you and your consent.

Notwithstanding the above, we may share information that does not identify you (including information that has been aggregated or de-identified) except as prohibited by applicable law. For information on your rights and choices regarding how we share information about you, please see the “Your Rights and Choices” section below.

## Social Media and Technology Integrations

We offer parts of our Service through websites, platforms, and services operated or controlled by separate entities. In addition, we integrate technologies operated or controlled by separate entities into parts of our Service. Some examples include:

**Links.** Our Service includes links that hyperlink to websites, platforms, and other services not operated or controlled by us. We may get a commission if you purchase a product after clicking on a link to an affiliate’s website.

**Liking, Sharing, and Logging-In.** We may embed a pixel or SDK on our Service that allows you to “like” or “share” content on, or log-in to your account through social media. If you choose to engage with such integration, we may receive information from



the social network that you have authorized to share with us. Please note that the social network may independently collect information about you through the integration.

**Brand Pages and Chatbots.** We may offer our content through social media. Any information you provide to us when you engage with our content (such as through our brand page or via our chatbot on Facebook Messenger) is treated in accordance with this Privacy Policy. Also, if you publicly reference our Service on social media (e.g., by using a hashtag associated with Codecademy in a tweet or post), we may use your reference on or in connection with our Service.

Please note that when you interact with other entities, including when you leave our Service, those entities may independently collect information about you and solicit information from you. The information collected and stored by those entities remains subject to their own policies and practices, including what information they share with us, your rights and choices on their services and devices, and whether they store information in the U.S. or elsewhere. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

## Analytics and Advertising

We use analytics services, such as Google Analytics, to help us understand how users access and use the Service. In addition, we work with agencies, advertisers, ad networks, and other technology services to place ads about our products and services on other websites and services. For example, we place ads through Google and Facebook that you may view on their platforms as well as on other websites and services.

As part of this process, we may incorporate tracking technologies into our own Service (including our website and emails) as well as into our ads displayed on other websites and services. Some of these tracking technologies may track your activities across time and services for purposes of associating the different devices you use, and delivering relevant ads and/or other content to you (“Interest-based Advertising”).

We also use audience matching services to reach people (or people similar to people) who have visited our Service or are identified in one or more of our databases (“Matched Ads”). This is done by us uploading a customer list to a technology service or incorporating a pixel from a technology service into our own Service, and the technology service matching

common factors between our data and their data. For instance, we incorporate the Facebook pixel on our Service and may share your email address with Facebook as part of our use of Facebook Custom Audiences. Some technology services may provide us with their own data, which is then uploaded into another technology service for matching common factors between those datasets.

As indicated above, vendors may act as our service providers, or in certain contexts, independently decide how to process your information. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

For further information on the types of tracking technologies we use on the Service and your rights and choices regarding analytics, Interest-based Advertising, and Matched Ads, please see the “Information Collected Automatically” and “Your Rights and Choices” sections.

# Your Rights and Choices

You have rights and choices with respect to information that relates to you, however such rights will vary depending on the category of information, and the subsequent use of such information. This section further describes your rights.

## 1. Account Information.

You may access, update, or remove certain information that you have provided to us through your account by visiting your account settings. Please note that we will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. European data subjects and California residents have additional rights as set forth in the sections entitled “Additional Disclosures for Data Subjects in Europe” and “Additional Disclosures for California Residents” below.

## 2. Tracking Technology Choices.

**Cookies and Pixels.** Most browsers accept cookies by default. You can instruct your browser by changing its settings, to decline or delete cookies. If you use multiple

browsers on your device, you will need to instruct each browser separately. Your ability to limit cookies is subject to your browser settings and limitations.

**Do Not Track.** Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no industry consensus as to what site and app operators should do with regard to these signals. Accordingly, unless and until the law is interpreted to require us to do so, we do not monitor or take action with respect to “Do Not Track” signals. For more information on “Do Not Track,” visit <http://www.allaboutdnt.com>.

**App and Location Technologies.** You can stop all collection of information via an app by uninstalling the app. You can also reset your device Ad ID at any time through your device settings, which is designed to allow you to limit the use of information collected about you. You can stop all collection of precise location data through an app by uninstalling the app or withdrawing your consent through your device settings.

Please be aware that if you disable or remove tracking technologies some parts of the Service may not function correctly.

### 3. Analytics and Interest-Based Advertising.

Google provides tools to allow you to opt out of the use of certain information collected by Google Analytics at <https://tools.google.com/dlpage/gaoptout> and by Google Analytics for Display Advertising or the Google Display Network at <https://www.google.com/settings/ads/onweb/>.

The companies we work with to provide you with targeted ads are required by us to give you the choice to opt out of receiving targeted ads. Most of these companies are participants of the Digital Advertising Alliance (“DAA”) and/or the Network Advertising Initiative (“NAI”). To learn more about the targeted ads provided by these companies, and how to opt out of receiving certain targeted ads from them, please visit: (i) for website targeted ads from DAA participants, <https://www.aboutads.info/choices>; (ii) for app targeted ads from DAA participants, <https://www.aboutads.info/appchoices>; and (iii) for targeted ads from NAI participants, <https://www.networkadvertising.org/choices/>. Opting out only means that the selected participants should no longer deliver certain targeted ads to you, but does not mean you will no longer receive any targeted content and/or ads (e.g., in connection with the participants’ other customers or from other technology services).

To opt out of us using your data for Matched Ads, please contact us as set forth in the “Contact Us” section below and specify that you wish to opt out of matched ads. We will request that the applicable technology service not serve you matched ads based on information we provide to it. Alternatively, you may directly contact the applicable technology service to opt out.

You may also limit our use of information collected from or about your mobile device for purposes of serving targeted ads to you by going to your device settings and selecting “Limit Ad Tracking” (for iOS devices) or “Opt out of Interest-Based Ads” (for Android devices).

Please note that if you opt out using any of these methods, the opt out will only apply to the specific browser or device from which you opt out. We are not responsible for the effectiveness of, or compliance with, any opt out options or programs, or the accuracy of any other entities’ statements regarding their opt out options or programs.

## 4. Communications.

**E-mails.** You can opt-out of receiving promotional emails from us at any time by following the instructions as provided in emails to click on the unsubscribe link, or by contacting us as set out in the “Contact Us” section below. Please note that you cannot opt-out of non-promotional emails, such as those about your account, transactions, servicing, or our ongoing business relations.

**Push Notifications.** If you have opted-in to receive push notifications on your device, you can opt-out at any time by adjusting the permissions in your device or uninstalling our app.

Please note that your opt out is limited to the email address and device used and will not affect subsequent subscriptions.

## Children’s Privacy

Our Service is generally not directed at children under the age of 16 and we do not knowingly collect or solicit personal information (as defined by the U.S. Children’s Privacy Protection Act, or “COPPA”) from anyone under the age of 13 in a manner not permitted by COPPA. If you are a parent or guardian and you believe we have collected information from

your child in a manner not permitted by law, please contact us through our Help Center. We will remove the data to the extent required by applicable law.

We do not “sell,” as that term is defined under the California Consumer Privacy Act, the personal information of minors under the age of 16 who are California residents. If you are a California resident under 18 years old and registered to use the Service, you can ask us to remove any content or information you have posted on the Service. To make a request, email us at the email address set out in “Contact Us” section with “California Under 18 Content Removal Request” in the subject line, and tell us what you want removed. We will make reasonable good faith efforts to remove the post from prospective public view, although we cannot ensure the complete or comprehensive removal of the content and may retain the content as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## School Privacy

In some circumstances, we may permit a schools to register Students to our service for the purpose of providing educational services. Because Codecademy provides the Service to schools to benefit and enhance a School’s curriculum, Codecademy relies on the school to obtain and provide appropriate consent, if needed, to collect personal information of students. We do not “sell,” as that term is defined under the California Consumer Privacy Act, any personal information of users collected through school accounts.

## Data Security

Codecademy uses commercially reasonable administrative, technical, and physical security safeguards designed to preserve the integrity and security of all information collected through the Service. However, no security system is impenetrable and we cannot guarantee the security of our systems 100%. In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable and appropriate steps to investigate the situation, notify those individuals whose information may have been compromised in accordance with any applicable laws and regulations, and take other steps as appropriate. Your privacy settings may also be affected by changes to the functionality of third party sites and services that you add to the Codecademy Service, such as social

networks. Codecademy is not responsible for the functionality or security measures of any third party.

## International Transfer

We are based in the U.S. and the information we collect is governed by U.S. law. If you are accessing the Service from outside of the U.S., please be aware that information collected through the Service may be transferred to, processed, stored, and used in the U.S. and other jurisdictions. Data protection laws in the U.S. and other jurisdictions may be different from those of your country of residence. Your use of the Service or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of information about you in the U.S. and other jurisdictions as set out in this Privacy Policy.

## Changes to this Privacy Policy

Codecademy reserves the right to modify or update this Privacy Policy from time to time to reflect the changes in our business and practices, and so you should review this page periodically. When we change the policy we will reflect the 'last modified' date at the top of this Privacy Policy.

## Links to Other Websites and Services

The Services may, from time to time, contain links to and from websites, platforms, and other services not operated or controlled by us. If you follow a link to any of these locations, please note that these locations have their own privacy policies and that we do not accept any responsibility or liability for their policies. Please check the individual policies before you submit any information to those locations.

## Contact Us

If you have any questions about this Privacy Policy, our data practices, our compliance with applicable law, or the Service, please contact us by submitting a ticket through our [Help Center](#), or by contacting us at:

Codecademy, Inc. 600 Broadway 2nd Floor New York City, NY 10012

This Privacy Policy has been designed to be accessible to people with disabilities. If you experience any difficulties accessing the information here, please contact us through the Help Center.

# Additional Disclosures for California Residents.

These additional disclosures for California residents apply only to individuals who reside in California. The California Consumer Privacy Act of 2018 (“CCPA”) provides additional rights to know, delete and opt out, and requires businesses collecting or disclosing personal information to provide notices and means to exercise rights.

## 1. Notice of Collection.

In the past 12 months, we have collected the following categories of personal information enumerated in the CCPA:

**Identifiers**, including name, email address, phone number account name, IP address, and an ID or number assigned to your account.

**Customer records**, billing and shipping address, and credit or debit card information.

**Demographics**, such as your age or gender. This category includes data that may qualify as protected classifications under other California or federal laws.

**Commercial information**, including purchases, you subscription and engagement with the Services.

**Internet activity**, including your interactions with our Service, your academic content, and performance data.

**Audio or visual data**, including pictures or vides you post on our Service.



**Geolocation data**, including location enabled services such as WiFi and GPS.

**Employment and education data**, including information you provide when you apply for a job with us.

**Inferences**, including information about your interests, preferences and favorites.

For more details on information we collect, including the sources we receive information from, review the Information Collection section. We collect and use these categories of personal information for the business purposes described in the Use of Information section, including to provide and manage our Services.

Codecademy does not generally sell information as the term “sell” is traditionally understood. However, to the extent “sale” under the CCPA is interpreted to include advertising technology activities such as those disclosed in the Analytics and Advertising section as a “sale,” we will comply with applicable law as to such activity. We disclose the following categories of personal information for commercial purposes: identifiers, demographic information, commercial information, internet activity, geolocation data and inferences. We use and partner with different types of entities to assist with our daily operations and manage our Service. Please review the Sharing of Information section for more detail about the parties we have shared information with.

## 2. Right to Know and Delete

If you are a California resident, you have the right to delete the personal information we have collected from you and the right to know certain information about our data practices in the preceding 12 months. In particular, you have the right to request the following from us:

The categories of personal information we have collected about you;

The categories of sources from which the personal information was collected;

The categories of personal information about you we disclosed for a business purpose or sold;

The categories of third parties to whom the personal information was disclosed for a business purpose or sold;

The business or commercial purpose for collecting or selling the personal information;  
and

The specific pieces of personal information we have collected about you.

To exercise any of these rights, please submit a request through our online privacy hub available [here](#), or contact us through our [Help Center](#). In the request, please specify which right you are seeking to exercise and the scope of the request. We will confirm receipt of your request within 10 days. We may require specific information from you to help us verify your identity and process your request. If we are unable to verify your identity, we may deny your request to know or delete.

If personal information about you has been processed by us as a service provider on behalf of a corporate customer or school customer and you wish to exercise any rights you have with such personal information, please inquire with our corporate or school customer directly. If you wish to make your request directly to us, please provide the name of the corporate customer or school customer on whose behalf we processed your personal information. We will refer your request to that corporate customer or school customer, and will support them to the extent required by applicable law in responding to your request.

### 3. Right to Opt-Out

To the extent Codecademy sells your personal information as the term “sell” is defined under the California Consumer Privacy Act, you have the right to opt-out of the sale of your personal information by us to third parties at any time. You may submit a request to opt-out by clicking [Do Not Sell My Personal Information](#). You may also submit a request to opt-out by contacting us through our [Help Center](#).

### 4. Authorized Agent

You can designate an authorized agent to submit requests on your behalf. However, we will require written proof of the agent’s permission to do so and verify your identity directly.

### 5. Right to Non-Discrimination

You have the right not to receive discriminatory treatment by us for the exercise of any of your rights.

## 6. Shine the Light.

Customers who are residents of California may request (i) a list of the categories of personal information disclosed by us to third parties during the immediately preceding calendar year for those third parties' own direct marketing purposes; and (ii) a list of the categories of third parties to whom we disclosed such information. To exercise a request, please write us at the email or postal address set out in "Contact Us" above and specify that you are making a "California Shine the Light Request." We may require additional information from you to allow us to verify your identity and are only required to respond to requests once during any calendar year.

## Additional Disclosures for Nevada Residents.

Nevada consumers may submit requests directing businesses not to sell certain kinds of personal information that the business has collected or will collect about the consumer. A sale under Nevada law is the exchange of personal information for monetary consideration by the business to a third party for the third party to license or sell the personal information to other third parties. If you are a Nevada consumer and wish to obtain information about our compliance with Nevada law, please contact us through our [Help Center](#).

## Additional Disclosures for Data Subjects in Europe.

### 1. Role

Data protection laws in Europe distinguish between organizations that process personal data for their own purposes (known as "controllers") and organizations that process personal data on behalf of other organizations (known as "processors"). Codecademy acts

as a controller with respect to personal data collected as you interact with our websites, emails, and advertisements.

## 2. Legal Basis for Processing

In the European Union (“EU”), the purposes for which we process your personal data are:

1. Where you have given consent to the processing for one or more specific purposes, either to us or to our service providers or partners;
2. Where we need to perform the contract we are about to enter into or have entered into with you for the Service;
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
4. Where we need to comply with a legal or regulatory obligation in the EU.

We have set out in Annex 1 below, found [here](#), a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. Please contact by submitting a ticket through our [Help Center](#) if you need details about the specific legal basis we are relying on to process your personal data where more than one legal basis has been set out.

## 3. Data Transfer

If your data is collected in Europe, we will transfer your personal data subject to appropriate safeguards, such as Standard Contractual Clauses.

## 4. Your Data Subject Rights.

If you are located in the EU or Switzerland, you have the following rights in respect of your personal data that we hold:

**Right of access.** The right to obtain access to your personal data.

**Right to rectification.** The right to obtain rectification of your personal data without undue delay where that personal data is inaccurate or incomplete.

**Right to erasure.** The right to obtain the erasure of your personal data without undue delay in certain circumstances, such as where the personal data is no longer necessary in relation to the purposes for which it was collected or processed.

**Right to restriction.** The right to obtain the restriction of the processing undertaken by us on your personal data in certain circumstances, such as where the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of that personal data.

**Right to portability.** The right to portability allows you to move, copy or transfer personal data easily from one organization to another.

**Right to object.** You have a right to object to processing based on legitimate interests and direct marketing.

If you wish to exercise one of these rights, please contact us using the contact details at the end of this Privacy Policy. We will respond to your request within 30 days. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions.

Please note that we retain information as necessary to fulfil the purposes for which it was collected, and may continue to retain and use information even after a data subject request for purposes of our legitimate interests, including as necessary to comply with our legal obligations, resolve disputes, prevent fraud, and enforce our agreements.

If your personal data has been processed by us on behalf of a business customer and you wish to exercise any rights you have with such personal data, please inquire with our customer directly. If you wish to make your request directly to us, please provide the name of our customer on whose behalf we processed your personal data. We will refer your request to that customer, and will support them to the extent required by applicable law in responding to your request.

## 5. Complaints.

If you have a complaint about our use of your personal data or response to your requests regarding your personal data, you may submit a complaint to the data protection regulator in your jurisdiction. We would, however, appreciate the opportunity to address your

concerns before you approach a data protection regulator, and would welcome you directing an inquiry first to us. In addition to the contact information above, please contact our [Help Center](#).

# ANNEX 1

## Legal basis for processing in the EU

Category of personal information	Purpose/Activity	Lawful basis for processing including basis of legitimate interest
<b>Contact information and basic personal details</b> such as your first name, last name, e-mail address and date of birth.	We use this information to operate, maintain and provide to you the features of the Service.	The processing is necessary for: the performance of a contract and to take steps prior to entering into a contract; and our legitimate interests, namely administering the Service, for marketing purposes and communicating with users.
	We use this information to communicate with you, including sending Service-related communications (such as invoices and information about updates to the Service, and any news, alerts and marketing communications (in line with your settings and options)).	The processing is necessary for: the performance of the contract and to take steps prior to entering into a contract; and our legitimate interests, namely administering the Service, for marketing purposes and communicating with users.
	We use this information to deal with enquiries and complaints made by or about you relating to the Service.	The processing is necessary for our legitimate interests, namely administering the Service, for marketing purposes and communicating with users.
<b>Information about how you access and use the Service including, for example, how frequently you access the Service</b> , the time you access the Service and how long you use the Service for, whether you access the Service from multiple devices, the website from which you came and the website to which you go when you leave the Service, and other actions you take on the Service.	We use this information to present the Service to you on your device.	The processing is necessary for our legitimate interests, namely to tailor the Service to the user and improve the Service generally.

Category of personal information	Purpose/Activity	Lawful basis for processing including basis of legitimate interest
	We use this information to administer the Service for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, and to help us develop new products and services.	The processing is necessary for our legitimate interests, namely communicating with users and responding to queries, complaints, and concerns, and for developing and improving the Service.
	We use this information to detect and prevent fraud.	The processing is necessary for our legitimate interests, namely the detection and prevention of fraud.
<b>Content you post to the Service</b> including any content you provide through messages, chat, or other functionality.	We use this information to operate, maintain and provide to you the features of the Service.	The processing is necessary for our legitimate interests, namely administering the Service.
	We use this information to improve the Service.	The processing is necessary for our legitimate interests, namely for developing and improving the Service.
<b>Location:</b> When you use the Service, we will collect and process location data. We use various technologies to determine location, including IP address, GPS and other sensors that may, for example, provide Codecademy with information on nearby devices, Wi-Fi access points and mobile towers.	We use this information to operate, maintain and provide to you the features of the Service.	The processing is necessary for our legitimate interests, namely administering the Service.
<b>Information provided by social networks, including LinkedIn, when you connect to the Service.</b> The features and functionality of the Service connects social networks, predominantly LinkedIn, to our Service. In this case, we collect personal information from the social network in accordance with your privacy settings on that social network. The connected social network may provide us with information, such as your name, LinkedIn ID, profile picture, network, gender, username, userID, age or age range, language, country, connections and any other information you have agreed it can share or that the social network provides to us.	We will use the personal information provided to allow you to log in to the Service, to help create a public profile for you, and where we provide the functionality, we will also use the information provided to assist you in sharing the content you create, or your experiences on the Service with your contacts on the connected social network.	The processing is necessary for: the performance of the contract and to take steps prior to entering into a contract; and our legitimate interests, namely administering the Service, for marketing purposes and communicating with users.