

SCRATCH

The Scratch Privacy Policy was last updated: February 14, 2019

Scratch understands how important privacy is to our community, especially kids and parents. We wrote this Privacy Policy to explain what information we collect through our website (scratch.mit.edu) (the "Site"), how we use, process, and share it, and what we're doing to keep it safe. It also tells you about your rights and choices with respect to your information, and how you can [contact us](#) if you have any questions or concerns.

If you would like to build projects with Scratch without submitting any Personal Information to us, you can download the [Scratch Offline Editor](#). Projects created in the [Scratch Offline Editor](#) are not accessible by the Scratch Team, and using the offline editor does not disclose any personally identifying information to Scratch unless you upload these projects to the Scratch online community.

What personal information does the Scratch Team collect about me?

For the purpose of this Privacy Policy, "Personal Information" means any information relating to an identified or identifiable individual. We obtain Personal Information relating to you from various sources described below.

Where applicable, we indicate whether and why you must provide us with your Personal Information, as well as the consequences of failing to do so. If you do not provide Personal Information when requested, you may not be able to benefit from our Site if that information is necessary to provide you with the service or if we are legally required to collect the information.

Account Information

In order to share projects, create studios, or post comments, you need to make an account. During account creation, we ask you for a username, your country, birth month and year, gender, and your email address (or your parent or guardian's email address if you are under 16 years old). We ask that you select a username that does not disclose your real name or other information that could identify you. Other users can see your username and country, but not your age, gender, or email address.

User-generated Content

We collect any information that you provide to us when you create Scratch projects (including unshared projects), write comments, or post on our forums.

Communications

If you contact us directly, we may receive additional information about you. For example, when you contact our Customer Support Team, we may receive your name, email address, phone number, the contents of a message or attachments that you may send to us, and other information you choose to provide.

Personal Information We Collect Automatically From Your Use of the Site

When you use Scratch, we and our third-party service providers collect information about you and your device through automated means, such as cookies and web server logs. By using Scratch, you consent to the placement of cookies and similar technologies in your browser in accordance with this Privacy Policy. The information collected in this manner includes your IP address, network location, what browser you are using, device IDs and characteristics, operating system version, language preferences, referring URLs, and information about the usage of our site.

We use this information, for example, to ensure that the site functions properly, to determine how many users have visited certain pages, or to prevent fraud. We use IP address information to derive your approximate location. We also work with analytics providers, such as Google Analytics, which use cookies and similar technologies to collect and analyze information about use of the site and report on activities and trends. These services may also collect information about the use of other websites, apps, and

online resources. You can learn more about Google's practices by going to <https://www.google.com/policies/privacy/partners/>. If you do not want information collected through the use of cookies, most browsers allow you to automatically decline cookies or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. If, however, you do not accept cookies, you may experience some inconvenience in your use of Scratch.

How does the Scratch Team use my personal information?

Internal and Service-Related Usage

We use Personal Information for internal and Site-related purposes, including to operate, provide, and maintain the Site.

Analytics and Improving the Site

We and our service providers use Personal Information that we collect on the Site, such as your location and your activities on the Site, to monitor and analyze usage of the Site and to improve and enhance the Site.

Communications

We may send emails to an email address you provide to us for customer-service or technical-support purposes, to send you information about topics or content that we think may interest you, or updates about the latest developments or features on the Site. We may also send a newsletter to the email address you provide to us if you subscribe to receive the newsletter. Parents and guardians who register their under-16 year olds for Scratch may also receive additional updates from the Scratch Foundation, a non-profit that supports Scratch educational initiatives.

Aggregate Data

We may de-identify and aggregate information collected through the Site for statistical analysis and other lawful purpose, including in research studies intended to improve our understanding of how people learn with Scratch. The results of this research are shared

with educators and researchers through conferences, journals, and other publications. You can find out more on our [Research page](#).

Legal

We may use your Personal Information to enforce our [Terms of Use](#), to defend our legal rights, and to comply with our legal obligations and internal policies. We moderate all content posted to Scratch, including unshared projects, comments, and forum posts. If you are located in the European Economic Area, we only process your Personal Information based on a valid legal ground, including when:

- You have consented to the use of your Personal Information, for example, to receive electronic marketing communications;
- We need your Personal Information to provide our services, including for account registration, to respond to your inquiries, or for customer support;
- We have a legal obligation to use your Personal Information; or
- We or a third party have a legitimate interest in using your Personal Information. In particular, we have a legitimate interest in using your Personal Information to personalize our services and provide you with tailored content, conduct business analytics, and otherwise improve the safety, security, and performance of our Site. We only rely on our or a third party's legitimate interests to process your Personal Information when these interests are not overridden by your rights and interests.

How Does Scratch Share my Personal Information?

We disclose information that we collect through the Site to third parties in the following circumstances:

- To third-party service providers who provide services such as website hosting, data analysis, information technology and related infrastructure provisions, customer service, email delivery, and other services.

- We may also disclose your Personal Information with your permission. We may seek your permission in various ways. For example, we may present you with an “opt-in” prompt when you register to use the Site or access certain content.
- To a potential or actual acquirer, successor, or assignee as part of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our organization or assets. You will have the opportunity to opt out of any such transfer if the new entity’s planned processing of your information differs materially from that set forth in this Privacy Policy.
- If required to do so by law or in the good faith belief that such action is appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, such as school, school districts, and law enforcement, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

Third Party Services

This Privacy Policy applies only to the processing of your Personal Information by Scratch. It does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any site or service to which the Site links. The inclusion of a link on the Site does not imply endorsement of the linked site or service by us or by our affiliates.

Your Rights and Choices

Updating Your Information

You can update your password, email address, and country through the [Account Settings](#) page. You can also reset your password through the [Account Reset](#) page. You cannot change your username, but you can make a new account and manually copy your projects to the new account.

If you want to delete your account, login to Scratch, and then click your username in the top right-hand corner. Select "Account Settings," then click the "I want to delete my account" link at the bottom of the page. Deleting your account hides all information from public view, but does not remove all of your information from our servers. If you want to have all of your information removed from our servers, please contact help@scratch.mit.edu for assistance.

Marketing Communications

If you decide at any time that you no longer wish to receive marketing communications from us, please follow the unsubscribe instructions provided in any of the communications. You may also opt out from receiving email from us by sending your request to us by email at help@scratch.mit.edu. Please be aware that, even after you opt out from receiving marketing communications from us, you may continue to receive administrative messages from us regarding the Site.

Your Data Protection Rights (EEA)

In certain jurisdictions, you have the right to request access and receive information about the Personal Information we maintain about you, to update and correct inaccuracies in your Personal Information, to restrict or object to the processing of your Personal Information, to have the information blocked, anonymized, or deleted, as appropriate, or to exercise your right to data portability to easily transfer your Personal Information to another company. Those rights may be limited in some circumstances by local law requirements. In addition to the above-mentioned rights, you also have the right to lodge a complaint with a competent supervisory authority subject to applicable law.

Where required by law, we obtain your consent for the processing of certain Personal Information collected by cookies or similar technologies, or used to send you direct marketing communications, or when we carry out other processing activities for which consent may be required. If we rely on consent for the processing of your Personal Information, you have the right to withdraw it at any time and free of charge. When you do so, this will not affect the lawfulness of the processing before your consent withdrawal.

To update your preferences, ask us to remove your information from our mailing lists, or submit a request to exercise your rights under applicable law, please contact us as specified in the “How to Contact Us” section below.

Data Retention

We take measures to delete your Personal Information or keep it in a form that does not allow you to be identified when this information is no longer necessary for the purposes for which we process it, unless we are required by law to keep this information for a longer period. When determining the retention period, we take into account various criteria, such as the type of services requested by or provided to you, the nature and length of our relationship with you, possible re-enrolment with our services, the impact on the services we provide to you if we delete some information from or about you, mandatory retention periods provided by law and the statute of limitations.

How does the Scratch Team protect my personal information?

The Scratch Team has in place administrative, physical, and technical procedures that are intended to protect the information we collect on the Scratch website against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the Personal Information in our possession. For example, we use SSL/TLS for all data transfer and strictly limit access to the Scratch servers and the data we store on them.

However, as effective as these measures are, no security system is impenetrable. We cannot completely guarantee the security of our databases, nor can we guarantee that the information you supply will not be intercepted while being transmitted to us over the Internet.

Notifications of changes to the Privacy Policy

We review our security measures and Privacy Policy on a periodic basis, and we may modify our policies as appropriate. If we make material changes, we will notify you through the Site or by sending you an email or other communication. We encourage you to review our Privacy Policy on a regular basis. The “Last Updated” date at the top of this page indicates when this Privacy Policy was last revised. Your continued use of the Site following these changes means that you accept the revised Privacy Policy.

International Cross-Border Data Transfer

Scratch is based in the United States. Personal Information that we collect may be transferred to, and stored at, any of our affiliates, partners, or service providers which may be inside or outside the European Economic Area, including the United States. By submitting your personal data, you agree to such transfers.

What can I do to help protect privacy on Scratch?

Please do not share personal contact information (such as your name, physical address, email address, or phone number) in projects, comments, profiles, studios, or forum posts. Please let us know if you see this kind of information by using the “Report” link which appears on the page. It is also important that you maintain the security and control of your account credentials, and not share your password with anyone.

Contact Us

The Code-to-Learn Foundation d/b/a The Scratch Foundation is the entity responsible for the processing of your Personal Information. If you have any questions about this Privacy Policy, or if you would like to exercise your rights to your Personal Information, you may contact us at help@scratch.mit.edu or via mail at:

Scratch Foundation
ATTN: Privacy Policy
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