

## PRIVACY POLICY

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Proprietary and Confidential  
For Authorized use only

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## Introduction

Guy Brown LLC has developed corporate policies that identify the security requirements for its information systems and personnel to ensure the integrity, confidentiality, and availability of its information. These policies are set forth by Guy Brown LLC management and in compliance with the Privacy requirements of the various regulatory bodies where Guy Brown LLC customers may reside.

## Purpose

The purpose of the policies that have been implemented by the company have been developed to establish access control requirements to ensure the confidentiality, integrity, and availability of Guy Brown LLC systems, facilities, and data are protected. These policies are consistent with applicable state and federal laws, Executive Orders, directives, regulations, standards, and guidance.

## Scope

The provisions of this policy pertain to all Guy Brown LLC employees, contractors, third parties, and others who have access to company and customer confidential information within Guy Brown LLC systems and facilities.

This Policy applies to our collection, use and disclosure of personal information related to:

- Users of our websites as well as any mobile applications, other websites, applications, and online services that display or link to this Policy (collectively, the "**Site**");
- Customers and prospective customers, including individuals who purchase our products through affiliate and other third-party retailers.
- Individuals who otherwise interact or communicate with us related to our Services.

## Management Commitment

Guy Brown LLC and its management are fully committed to protecting the confidentiality and integrity of corporate proprietary and production systems, facilities, and data as well as the

availability of services in the Guy Brown LLC systems by implementing adequate security controls for the protection of client information.

## Authority

The following applicable laws, directives, policies, regulations, and standards were used as part of this policy's development. These include, but are not limited to:

Regulation/Law	Description	Coverage/Threshold
California Consumer Privacy Act (CCPA)	A data privacy law enacted in California that grants residents rights regarding their personal information.	Annual gross revenue over \$25 million; buying, receiving, or selling the personal information of 50,000 of more consumers, households, or devices; or deriving 50% or more of annual revenues from selling consumer personal information from California residents.
California Privacy Rights Act (CPRA)	A data privacy law that strengthens CCPA by expanding consumer rights, adding new data protection requirements, and establishing the California Privacy Protection Agency.	Annual gross revenue over \$25 million; buying, receiving, or selling the personal information of 100,000 of more consumers, households, or devices; or deriving 50% or more of annual revenues from selling consumer personal information from California residents.
Colorado Privacy Act (CPA)	A state law that gives Colorado residents more control over their personal data and sets rules for businesses on how to collect, use, and protect that data.	Controls or processes personal data of 100,000 or more Colorado residents in a calendar year. Derives revenue or receives a discount on goods or services from the sale of personal data and controls or processes data for 25,000 or more Colorado residents.

Federal Trade Commission (FTC) Act	A U.S. government agency responsible for protecting consumers and promoting fair competition by preventing deceptive, unfair, or fraudulent business practices.	The FTC act applies to nearly all businesses and organizations in the US that engage in commerce, regardless of size or revenue. The FTC act does not set explicit thresholds and enforces privacy standards based on other sector-specific regulations, such as the Children's Online Privacy Protection Act (COPPA) for children's data or the Gramm-Leach-Bliley Act (GLBA) for financial data.
Gramm-Leach-Bliley Act (GLBA)	A U.S. federal law that requires financial institutions to protect the privacy and security of consumers' personal financial information.	The GLBA act applies to businesses primarily engaged in financial activities. Any company engaged in these activities and collecting or maintaining nonpublic personal information (NPI) about individuals (customers and consumers) is generally required to comply.
The Personal Information Protection and Electronic Documents Act (PIPEDA)	A Canadian federal law that governs how private-sector organizations collect, use, and disclose personal information during commercial activities.	The PIPEDA act applies to any private-sector organization engaged in commercial activities involving personal information, regardless of organization's size or revenue.
Virginia Consumer Data Protection Act (VCDPA)	A data privacy law in Virginia that strengthens consumer rights and sets rules for businesses managing personal data.	Controls or processes personal data for at least 100,000 Virginia residents in a calendar year. Derives over 50% of gross revenue from the sale of personal data and controls or processes data for at least 25,000 Virginia residents.

The table below provides a comprehensive mapping of the key requirements across major privacy regulations. By aligning to these requirements, Guy Brown can gain clarity on common compliance obligations, such as consumer rights, data minimization, security measures, and transparency in data handling practices. This mapping serves as a valuable resource to develop a

unified compliance strategy that meets regulatory expectations, mitigates risk, and enhances data privacy practices.

Requirement(s)	CCPA	CPRA	VCDPA	CPA	FTC	GLBA	PIPEDA
Access and Correction							X
Accountability							X
Consent							X
Consumer Rights	X		X	X			
Contractual Requirements		X					
Data Disclosure	X						
Data Minimization		X				X	
Data Processing Agreements				X			
Data Protection Assessments			X	X			
Data Security				X	X		X
Enforcement					X		
Enhanced Rights		X					
Non-Discrimination	X						
Opt-Out	X					X	
Opt-Out for Sharing	X	X					
Privacy Notice						X	

Privacy Policy	X		X				
Prohibit Deceptive Practices					X		
Safeguard Rule						X	
Sensitive Data		X	X	X			
Transparency							X

## Regulatory Considerations

In addition to California and Virginia, several other US states have enacted or are considering privacy legislation to protect consumer data. It is essential for Guy Brown to monitor these evolving regulations and ensure compliance with applicable state laws to maintain a comprehensive data privacy framework. Although these state laws may not yet match the breadth of CCPA, CPRA, and VCDPA, they introduce critical requirements for data protection, transparency, and consumer rights that cannot be overlooked. The following states currently have privacy laws in place, setting foundational standards that must be addressed to align with regional privacy expectations:

Connecticut	Delaware	Florida
Indiana	Iowa	Kentucky
Maryland	Minnesota	Montana
Nebraska	New Hampshire	New Jersey
Oregon	Rhode Island	Tennessee
Texas	Utah	

Note that Guy Brown may also be subject to additional regulations, frameworks, and standards that impose further privacy and data protection requirements. Meeting these requirements not only ensures regulatory compliance but also strengthens Guy Brown's data governance and risk management practices.

Regulation/Standard/Framework	Description
Americans with Disabilities Act (ADA)	A U.S. civil rights law that prevents discrimination against people with disabilities in areas like jobs, public spaces, transportation, and government services, ensuring both physical and digital access.
EN 301 549	A European standard that specifies accessibility requirements for ICT (Information and Communication Technology) products and services in public procurement within the EU.
General Data Protection Regulation (GDPR)	A European Union regulation that protects individuals' personal data and privacy rights.
Healthcare Information Portability and Accountability Act (HIPAA) (Security and Privacy)	A U.S. law that establishes standards for protecting sensitive patient health information in healthcare and related industries.
Health Information Trust Alliance (HITRUST)	A certifiable framework that provides a comprehensive approach to regulatory compliance and risk management in the healthcare industry.
International Standards Organization (ISO) 27001- Information Security Management System (ISMS)	An internationally recognized standard that outlines the requirements for establishing, implementing, maintaining, and continuously improving an information security management system.



International Standards Organization (ISO) 27701 - Privacy Information Management System (PIMS)	An international standard that outlines specific requirements and guidance for establishing, implementing, maintaining, and improving a PIMS to manage personal data and ensure compliance with global privacy regulations.
National Institute of Standards and Technology (NIST) Privacy Framework	A voluntary framework providing guidance for managing privacy risks and protecting individuals' data.
Rehabilitation Act Section 508	A U.S. federal law under the Rehabilitation Act that requires federal agencies to make their electronic and information technology accessible to people with disabilities.
Web Content Accessibility Guidelines 2.1	An international set of guidelines created by the World Wide Web Consortium (W3C) for making web content accessible to people with disabilities.

## Policy Requirements

This Privacy Policy ("**Policy**") describes how Guy Brown LLC ("**Guy Brown LLC**," "**we**" or "**us**") collects, uses, and discloses information related to our customers and prospective customers, visitors to Guy Brown LLC, and users of our websites and mobile applications, as well as associated services (collectively, the "**Services**"). Your use of our Sites is subject to the Terms of Use, which include applicable terms governing limitations on liability and the resolution of disputes.

Please see the Your Rights and Choices section below for a description of the choices we provide and the rights you have regarding your personal information, as well the Additional Privacy Information for Certain Jurisdictions section, which includes information about privacy rights for residents of certain states. If you are a California resident, please be sure to review the section below for important information about the categories of personal information we collect and disclose and your California privacy rights.

**Personal Information.** In general, personal information includes any information that identifies, relates to, describes, or is reasonably capable of being associated, linked, or linkable with a particular individual.

**Not Covered by this Notice.** This Privacy Policy does not apply to job applicants or to Guy Brown LLC employees and non-employee workers, whose personal information is subject to different privacy notices.

**By disclosing your personal information to us, interacting with us, or using our Services, you understand and agree that Guy Brown LLC may collect, use, and disclose your personal information in accordance with this Privacy Policy. If required by applicable law, we will obtain your consent to our collection, use, transfer, and disclosure of your personal information.**

## Collection of Personal Information

The personal information we collect varies depending upon the nature of the Services provided or used and our interactions with individuals.

**Sources of Personal Information.** We may collect personal information about individuals:

- *Directly from you:* such as when you create an online account with us, make a purchase, participate in contests and promotions we offer, attend our events, or register to receive marketing and other communications from us, or contact us for customer support purposes.
- *From third parties:* such as affiliate and other third-party retailers that sell our products, public records, third party providers of services to us (e.g., fraud detection, identity verification and security), consumer data resellers, social networks, joint marketing partners and affiliate companies.
- *Related to your use of our Services:* including information we collect automatically when you use our Sites, or interact with us, or information we derive about you and your preferences or interests based on the personal information we collect and our interactions with you.

**Information We Collect from You.** We may collect personal information from you related to:

- *Registration, accounts, and profiles:* when you register for an account with us, we collect your name, email, and password; we may also collect additional information such as your preferences, location, and payment details.
- *Purchases, orders, and payments:* if you make a purchase, submit an order, return items, or sign up for certain Services, we collect information to process your payment, order or refund,

fulfill your order, including name, billing and shipping address and details, payment type, as well as credit card number or other payment account details (e.g., PayPal).

- *Marketing, surveys, and events:* if you sign up to receive news, updates, offers and other marketing communications from us, we may collect your name and contact information about your preferences. We may also collect your name, email address, and other information when you participate in contests, sweepstakes, events, or activities offered by us (collectively, "events") or submit surveys or feedback to us.
- *Your communications and requests:* when you email us, call us, or otherwise send us communications, we collect and maintain a record of your contact details, communications, and our responses.
- *User content:* if you post content or submit reviews and comments to us ("User Content"), we may maintain a record of your User Content, including the location, date, and time of submission.
- *Mobile applications:* if you use our mobile applications, we collect information on and/or through these mobile applications, which may include (with your permission) access to your location, camera, photos, and contacts, as well as permission to send you push notifications.

**Information We Collect from Third Parties.** We may collect personal information about you from third party sources (which may be combined other personal information we have collected about you), such as:

- *Third party retailers:* if you purchase our products from a third-party retailer, we receive information from that third party for order processing and fulfillment, returns and refunds processing, warranty, and related purposes, which may include name, contact information, shipping, and other order details.
- *Social media:* if you choose to link, create, or log in to your Services account with a social media service (e.g., Twitter, Facebook, Instagram, etc.), we collect your permission to access certain information from your profile with that social media service. If you post or if you engage with a separate social media service or interact with us on our page with any social media service, we may collect personal information about you related to those interactions.
- *Other:* we may obtain personal information, such as demographic information or updated contact details, from third parties; we may also collect information from public records.

**Information We Collect or Derive About You.** We may collect or derive personal information about you, your use of our Sites and Apps, visits to our Stores, or other interactions with us:

- *Sites and Apps:* We and our third party providers may use cookies, pixels, tags, log-files, and other technologies to collect information about a user from their browser or device, including, without limitation, your browser type, device type, operating system, software version, phone model, phone operating system, platform-dependent information, requested document,



referring URL, date and time of your visit, clickstream data (e.g. about the pages you view, links you click and date and time stamps for your activities on our Sites) and the IP address associated with your transactions in the system. This information that we collect automatically may be linked with other personal information we have collected. For more information, see the Cookies and Tracking section below.

- *Profile and Interests:* we may create profiles relating to you to show you the content that we think you might be interested in and reach you with more relevant ads and marketing.

## Use of Personal Information

Guy Brown LLC may use personal information collected from you and other information collected automatically for a variety of purposes, including, without limitation, to:

- *Providing support and services:* including to provide our Services, operate our Sites, Apps, and online services; to communicate with you about your access to and use of our Services; to respond to your inquiries; to provide troubleshooting, fulfill your orders and requests, process your payments, and provide technical support; and for other customer service and support purposes.
- *Analyzing and improving our business:* including to better understand how users access and use our Services and Sites, to evaluate and improve our Sites, Services and business operations, and to develop new features, offerings and services; to conduct surveys and other evaluations (such as customer satisfaction surveys); to monitor consumer interest in our products and Services; to troubleshoot problems that may arise on the Sites; to improve the accuracy of our customer database; to increase our understanding of our customer database; to increase our understanding of our customers; and for other research and analytical purposes.
- *Personalizing content and experiences:* including tailoring content we send or display on our Sites and other Services; to offer location customization and personalized help and instructions; and to otherwise personalize your experiences. To assist in these purposes, as well as the other purposes identified in this Policy, at certain times, we create a profile relating to you to show you the content that we think you might be interested in and to display the content according to your preferences.
- *Advertising, marketing and promotional purposes:* including to reach you with more relevant ads and to evaluate, measure and improve the effectiveness of our ad campaigns; to send you newsletters, offers or other information we think may interest you; to contact you about our services, products, or other information we think may interest you; to identify potential new customers; and to administer promotions, sweepstakes, contests or other special promotions.
- *Securing and protecting our business:* including to protect and secure our business operations, assets, services, network and information and technology resources; to investigate, prevent, detect, and take action regarding fraud, unauthorized access, situations involving potential threats to the rights or safety of any person or third party, or other unauthorized activities or misconduct.

- *Defending our legal rights:* including to manage and respond to actual and potential legal disputes and claims, and to otherwise establish, defend or protect our rights or interests, including in the context of anticipated or actual litigation with third parties.
- *Auditing, reporting, corporate governance, and internal operations:* including relating to financial, tax and accounting audits; audits and assessments of our operations, privacy, security and financial controls, risk, and compliance with legal obligations; our general business, accounting, record keeping and legal functions; and related to any actual or contemplated merger, acquisition, asset sale or transfer, financing, bankruptcy or restructuring of all or part of our business.
- *Complying with legal obligations:* including to comply with the law, our legal obligations and legal process, such warrants, subpoenas, court orders, and regulatory or law enforcement requests.

**Aggregate and De-identified Data.** We may de-identify information and create anonymous and aggregated data sets and reports to assess, improve and develop our business, products, and services, prepare benchmarking reports on our industry and for other research, marketing, and analytics purposes.

## Disclosure of Personal Information

We may share or disclose the personal information we collect as follows:

- *Service providers:* We may disclose personal information with third-party service providers who use this information to perform services for us, such as hosting providers, auditors, advisors, consultants, customer service and/or support providers.
- *Third parties:* We may share personal information with third parties that provide advertising, campaign measurement, online and/or mobile analytics, and related services. These third parties may receive or access browsing and/or other data about your use of the Services, to help us better reach individuals with relevant ads and/or measure our ad campaigns, and/or to better understand how individuals interact with our Sites and Services overtime and across devices. We may also transfer and/or sell personal information we collect and/or join with other businesses to bring selected opportunities to customers or potential customers.
- *Subsidiaries and affiliates:* We may share your personal information with our affiliated companies (i.e., our parent company and other companies under common ownership, control, or management with us); they may use such personal information for the purposes set out in this Policy.
- *Legal compliance:* We may be required to share personal information in response to a valid court order, subpoena, government investigation, or as otherwise required by law. We also reserve the right to report to law enforcement agencies any activities that we, in good faith, believe to be unlawful. In addition, we may share certain personal information when we believe that doing so is reasonably necessary to protect the rights, property, and safety of our company and/or others.

- **Business transfers:** We may disclose and/or transfer personal information as part of any actual or contemplated merger, sale, transfer of assets, acquisition, financing and/or restructuring of all or part of our business, bankruptcy, or similar event, including related to due diligence conducted prior to such event where permitted by law.
- **Protect our rights:** We may disclose personal information where we believe it necessary to respond to claims asserted against us, to enforce or administer our agreements and terms, for fraud prevention, risk assessment, investigation and/or to protect the rights, property or safety of Guy Brown LLC or our affiliates, clients, customers and/or others. Regarding audiovisual recordings of online lessons, the recordings are accessible only by approved Guy Brown LLC employee administrators and may be shared with legal counsel to protect our rights.

**Aggregated and De-identified Data.** We may share aggregate or de-identified information with third parties for research, marketing, advertising, analytics, and/or other purposes.

## Cookies and Analytics

We use cookies, pixels, tags, and other technologies, which may be provided by third parties, on our Sites to enable certain functionality and for security and fraud detection and prevention, as well as to collect usage information about our Sites and the emails that we send and to personalize content and provide more relevant ads and information. We may combine the information we collect via these technologies with other information, including personal information that we collect.

**Cookies.** Cookies are alphanumeric identifiers that are transferred to your computer through your web browser for record-keeping purposes. Some cookies enable you to log-in to our Sites or save certain settings and preferences, while others allow us to track usage and activities on our Sites, personalize content on our Sites, or deliver more relevant ads on our Sites and third-party sites. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The "Help" tab on the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you block cookies, however, certain features on our Sites may not be available or function properly.

**Log files.** Most browsers collect certain information, such as your IP address, device type, screen resolution, operating system version and internet browser type and version. This information is gathered automatically and stored in log files.

***Pixel tags and embedded script*** (aka clear GIFs and web beacons). Pixel tags are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, pixel tags are embedded invisibly on web pages. We may use these, in connection with our Sites to, among other things, track the activities users of our Services, improve ads, personalize, and manage content, and gather usage information about our Sites. We may also use these in HTML emails too, to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

***Third Party Analytics Tools.*** Our Sites use automated devices and applications operated by third parties, such as Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Sites and report on activities and trends. This service may also collect information regarding the use of other websites, apps, and online resources.

## Contact Us

If you have any questions about this Privacy Policy or our data practices, please [contact us](#).

