

GUARDIAN CENTERS

Privacy Policy

Last updated July 10, 2023.

Guardian Centers of Georgia, LLC (“**Guardian Centers**”, “**Company**”, “**us**”, “**our**”, or “**we**”) is committed to protecting your privacy, and as a result, has developed the following Privacy Policy (“**Policy**”). This Policy describes how we [collect](#), [process](#), and [share](#) Personal Data, your [Rights & Choices](#), and other important information about how we handle your Personal Data. Please read this policy carefully. If you do not understand any aspects of this privacy policy, please [contact us](#).

Scope of this Policy

This Policy applies to your use of our “**Services**,” which include the following:

Our “**Offline Services**”

- In-person services, such as when you visit our campus or when you participate in one of our in-person training courses or full-scale exercises.

Our “**Digital Services**”

- Our website, <https://www.guardiancenters.com/>; and
- Our social media accounts and any content available through these various platforms or otherwise sent by us using digital means.

Unless explicitly stated otherwise, any new features that augment or enhance the current Service shall be subject to this Privacy Policy.

This Policy does not apply to third party websites, products, or services. Third parties may operate or develop parts of the Guardian Centers website. In these cases, the terms, conditions, and privacy practices of the third party, not those of Guardian Centers, may govern your transactions, and we may have no control over the Personal Data collected.

How to Contact Us

The controller of your Personal Data under this Policy is Guardian Centers, LLC. You may contact our data privacy team as follows:

Physical Address: **Guardian Centers of Georgia, LLC**
600 Perry Parkway
Perry, GA 31069

Data Request (where available
under applicable law);
Marketing Choices; Data
Updates; and General

Inquiries: Email info@guardiancenters.com , or visit our [Contact Us](#) page.

Categories and Sources of Personal Data

The following describes how we **collect** data relating to identified or identifiable individuals and households (“**Personal Data**”).

Categories of Personal Data We Process

The categories of Personal Data we collect, and process may include:

Audio/Visual Data-Video or image recordings of training courses or exercises, as well as audio files and records, such as voicemails, call recordings, and the like.

Biographical Data-Data relating to professional and employment history, qualifications, and similar biographic information.

Contact Data-Identity Data we can use to contact you, such as email, physical addresses, or phone number.

Device / Network Data-Browsing history, search history, and information regarding your interaction with a website, application, or advertisement (e.g. IP Address, MAC Address, SSIDs, application ID/AdID/IDFA, session navigation history and similar browsing metadata, and other data generated through applications and browsers, including cookies and similar technologies or other device identifiers or persistent identifiers), online user ID, device characteristics (such as browser/OS version), web server logs, application logs, first party cookies, third party cookies, web beacons, clear gifs and pixel tags.

General Location Data- Non-precise location data, e.g., location information derived from an IP address or social media tags/posts.

Identity Data-Information such as your name; address; email address; telephone number; gender; date of birth, age and/or age range; account login details, e.g. username and password.

Inference Data-Personal Data generated reflecting your preferences, characteristics, predispositions, behavior, demographics, household characteristics, market segments, likes, favorites and other data or analytics.

Payment Data-Payment information, such as bank account details, payment card information, and relevant information in connection with a financial transaction.

Transaction Data-Information about the Services we provide to you or the contracts or other transactions you enter into with us.

User Content-Unstructured/free-form data that may include any category of Personal Data, e.g., data that you give us in free text fields such as comment boxes.

Sources of Personal Data We Process

We collect Personal Data from various sources, which include:

Data you provide us-We receive Personal Data when you provide them to us, when you complete a transaction with us, or when you otherwise use our Services.

Data we collect automatically-We collect Personal Data about or generated by any device used to access our Digital Services.

Customers-We receive Personal Data from certain customers, including law enforcement agencies, government departments, and other first responder organizations, who transfer Personal Data to us when they sign you up for our Services, or when you use our Services pursuant to our relationship with that entity.

Service Providers-We receive Personal Data from third-party service providers, who provide us with Personal Data through the services they provide for us.

Social media companies-We receive Personal Data from Meta (e.g., Facebook) and other social media companies when you interact with that social media company on or in connection with our Services.

Data we create or infer-We may create and infer Personal Data such as Inference Data or Aggregate Data based on our observations or analysis of other Personal Data processed under this Policy, and we may correlate this data with other data we process about you.

Data Processing Contexts / Notice at Collection

The following describes how we **process** Personal Data.

Offline Services

We process Identity Data, Contact Data, and User Content when you visit our campus or when you register to participate in one of our in-person training courses or full-scale exercises. We may process Audio/Visual Data such as if we make recordings of certain courses or exercises. We may also process Transaction Data and Payment Data when you engage us to provide our Services to you and/or your team.

We process this Personal Data to provide full scale, personalized, and accurate curriculum and scenario development, exercise design, technical assistance, and consultation, provide you with updates about your training or exercises, as well as for our [Business Purposes](#).

Digital Services

General

We process Device/Network Data, Contact Data, Identity Data, General Location Data, and Inference Data when you engage with us through our website or social media accounts.

We use this Personal Data as necessary to operate our Digital Services, such as keeping you logged in, delivering pages, for our [Business Purposes](#), and our other legitimate interests, such as:

- ensuring the security of our websites and other technology systems; and
- analyzing the use of our Services, including navigation patterns, clicks, etc. to help understand and make improvements to the Services.

Cookies and other tracking technologies

We process Identity Data, Device/Network Data, Contact Data, Inference Data, and General Location Data, in connection with our use of cookies and similar technologies on our Digital Services. We may collect this data automatically.

We and authorized third parties may use cookies and similar technologies for the following purposes:

- for “essential” purposes necessary for our Digital Services to operate (such as maintaining user sessions, CDNs, and the like);
- for “functional” purposes, such as to enable certain features of our Digital Services (for example, to allow a customer to maintain an online shopping cart);
- for “analytics” purposes and to improve our Digital Services, such as to analyze the traffic to and on our Digital Services (for example, we can count how many people have looked at a specific page, or see how visitors move around the website when they use it, to distinguish unique visits/visitors to our Digital Services, and what website they visited prior to visiting our website, and use this information to understand user behaviors and improve the design and functionality of the website);
- for “retargeting,” [Targeted Advertising](#), or other advertising and marketing purposes, including technologies that process Inference Data or other data so that we can deliver, buy, or target advertisements which are more likely to be of interest to you; and
- for “social media” e.g. via third-party social media cookies, or when you share information using a social media sharing button or “like” button on our Services or you link your account or engage with our content on or through a social networking website such as Facebook or Twitter.

We may also process this Personal Data for our [Business Purposes](#). See your [Rights & Choices](#) for information regarding opt-out rights for cookies and similar technologies.

Contact Us; Support

We collect and process Identity Data, Contact Data, and User Content when you contact us, e.g. through a contact us or training solution inquiry form, for support, or when you report a problem with our Website. If you call us via phone, we may collect Audio/Visual Data from the call recording.

We process this Personal Data to respond to your request, and communicate with you, as appropriate, and for our [Business Purposes](#).

Employment

We process Identity Data, Contact Data, Biographical Data, Inference Data, User Content, and Payment Data in connection with your application for an internship or employment.

We process this Personal Data as necessary to evaluate, establish, and maintain the employment or internship relationship, and for our [Business Purposes](#). We do not sell or share Personal Data processed in this context.

Processing Purposes

Business Purposes

We and our Service Providers process Personal Data we hold for numerous business purposes, depending on the context of collection, your [Rights & Choices](#), and our legitimate interests. We generally process Personal Data for the following “Business Purposes.”

Service Delivery

We process Personal Data as necessary to provide our Services and the products and services you purchase or request. For example, we process Personal Data to develop and deliver accurate and

personalized training courses and exercises, for curriculum development and exercise design, or as otherwise necessary to fulfill our contractual obligations to you, provide you with the information, features, and services you request, and create relevant documentation.

Internal Processing and Service Improvement

We may use any Personal Data we process through our Services as necessary in connection with our legitimate interests in improving the design of our Service, understanding how our Services are used or function, for customer service purposes, for internal research, technical or feature development, to track service use, QA and debugging, audits, and similar purposes.

Security and Incident Detection

We may process Personal Data in connection with our legitimate interest in ensuring that our Services are secure, identify and prevent crime, prevent fraud, verify or authenticate users/individuals, and ensure the safety of our users. Similarly, we process Personal Data on our Digital Services as necessary to detect security incidents, protect against, and respond to malicious, deceptive, fraudulent, or illegal activity. We may analyze network traffic, device patterns, and characteristics, maintain and analyze logs and process similar Personal Data in connection with our information security activities.

Aggregated Data

We may process Personal Data in order to identify trends, including to create aggregated and anonymized data about use of our Services, and other similar information ("**Aggregated Data**"). Aggregated Data that does not contain Personal Data is not subject to this Privacy Policy.

Compliance, Health, Safety, Public Interest

We may also process Personal Data as necessary to comply with our legal obligations, such as where you exercise your rights under data protection law, for the establishment and defense of legal claims, where we must comply with requests from government or law enforcement officials, and as may be required to meet national security or law enforcement requirements or prevent illegal activity. We may also process data to protect the vital interests of individuals, or on certain public interest grounds, each to the extent required or permitted under applicable law. Please see the [Disclosure/Sharing of Personal Data](#) section for more information about how we disclose Personal Data in extraordinary circumstances.

Targeted Advertising

In some jurisdictions, we may engage in advertising targeted to your interests based on Personal Data that we obtain or infer from your activities across non-affiliated websites, applications, or services in order to predict your preferences or interests ("**Targeted Advertising**"). This form of advertising includes various parties and service providers, including third party data controllers, engaged in the processing of Personal Data in connection with advertising. These parties may be able to identify you across sites, devices, and over time.

We generally use Targeted Advertising for the purpose of raising awareness and fundraising for our Services, marketing our Services and third-party goods and services, and to send marketing communications, including by creating custom marketing audiences on third-party websites or social media platforms. For more information, please review your [Rights & Choices](#).

Disclosure/Sharing of Personal Data

We may share Personal Data with the following categories of third-party recipients and/or for the following reasons:

Affiliates-We may share Personal Data internally with our current and future affiliated entities.

Service Providers- We may share your Personal Data with service providers who provide certain services or process data on our behalf in connection with our general business operations, service fulfillment and improvements, to enable certain features, and in connection with our [Business Purposes](#).

Sponsors, Advertisers, and Social Media Platforms- We may share certain Personal Data with social media platforms, advertisers, or sponsors in support of our [Business Purposes](#) and [Commercial Purposes](#). We may allow these third parties to operate through our Services.

Customers- We may share your Personal Data with our customers, including law enforcement agencies, government departments, or other first responder organizations, through which you may be able to participate in our Services.

Data Aggregators- We may share Personal Data with data aggregators in support of [Targeted Advertising](#). These disclosures/sales can help better personalize our Services the services of third parties, and help ensure that you see advertisements that are more relevant to your interests.

Successors- We may share Personal Data in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by the Company about our Users is among the assets transferred.

Lawful Recipients-In limited circumstances, we may, without notice or your consent, access and disclose your Personal Data, any communications sent or received by you, and any other information that we may have about you to the extent we believe such disclosure is legally required, to prevent or respond to a crime, to investigate violations of our Terms of Use, in the vital interests of us or any person (such as where we reasonably believe the use or disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual or to public health or safety) or in such other circumstances as may be required or permitted by law. These disclosures may be made to governments that do not ensure the same degree of protection of your Personal Data as your home jurisdiction. We may, in our sole discretion (but without any obligation), object to the disclosure of your Personal Data to such parties.

Your Rights & Choices

Rights

You may send us an e-mail via our contact link to request access to, correct, or delete any Personal Data that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

Your California Privacy Rights

California Civil Code Section § 1798.83 permits users of our Services that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please [Contact Us](#).

Your Nevada Privacy Rights

Nevada Revised Statutes (NRS 603A.300 et seq.) permits users of our Services that are Nevada consumer to direct an operator of an Internet website or online service to refrain from making any sale of any covered information the operator has collected or will collect about that consumer. To make such a request, please [Contact Us](#).

Choices

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

Withdrawing Your Consent/Opt-Out

You may withdraw any consent you have provided at any time. The consequence of you withdrawing consent might be that we cannot perform certain services for you, such as location-based services, personalizing or making relevant certain types of advertising, or other services conditioned on your consent or choice not to opt-out.

Cookies, Similar Technologies, and Targeted Advertising

General- If you do not want information collected through the use of cookies, you can manage/deny cookies (and certain technologies) using your browser's settings menu. You may need to opt out of third-party services directly via the third party. For example, to opt-out of Google's analytic and marketing services, visit [Google Analytics Terms of Use](#), the [Google Policy](#), or [Google Analytics Opt-out](#). If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

Targeted Advertising- You may opt out or withdraw your consent to Targeted Advertising by submitting requests to third parties, including for the vendors listed below:

- [Google Ads](#)
- [DoubleClick](#)
- [Facebook Custom Audience Pixel](#)
- [Digital Advertising Alliance's opt-out](#)
- [Network Advertising Initiative opt-out](#)

Do-Not-Track - Our Services do not respond to your browser's do-not-track request.

Data Security

We implement and maintain commercially reasonable security measures to secure your Personal Data from unauthorized processing. While we endeavor to protect our Services and your Personal Data from unauthorized access, use, modification and disclosure, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others.

Data Retention

We retain Personal Data for so long as it is reasonably necessary to achieve the relevant processing purposes described in this Privacy Policy, or for so long as is required by law. What is necessary may vary depending on the context and purpose of processing. We generally consider the following factors when we determine how long to retain data (without limitation):

- Retention periods established under applicable law;
- Industry best practices;
- Whether the purpose of processing is reasonably likely to justify further processing;
- Risks to individual privacy in continued processing;
- IT systems design considerations/limitations; and
- The costs associated continued processing, retention, and deletion.

We will review retention periods periodically and may pseudonymize or anonymize data held for longer periods.

Children

Our Services are neither directed at nor intended for use by persons under the age of 13 in the US. If a child under the age of 13 has provided us with Personal Data and if the parent or guardian of the child would like the information submitted by the child deleted from our database, we asks that a parent or guardian of the child [Contact Us](#). We will use reasonable efforts to delete such information from our Services. Further, if we learn that <https://guardiancenters.com/> has collected Personal Data from a child under the age of 13, we will take reasonable steps to promptly delete that information.

Changes to our Policy

We may update this Privacy Policy from time to time. If we decide to change our Policy, we will post an updated Policy on this page. We will notify you by revising the “Last Updated” date at the top of this Policy and, in some cases, we may provide you with additional notice, such as a statement on our homepage or sending you an email notification. Your continued use of our Services constitutes your acknowledgement of any revised Policy.

International Transfers of your Personal Data

We operate in and use service providers located in the United States. If you are located outside the U.S., your Personal Data may be transferred to the U.S. The U.S. may not provide the same legal protections guaranteed to Personal Data in foreign countries. Contact us for more information regarding transfers of data to the U.S.