



GRAY[™]
DECISION INTELLIGENCE

Gray DI Privacy Policy
Effective Date: May 15, 2026

Purpose and Scope

At Gray Decision Intelligence, Inc. ("we," "our," "us," "Gray DI"), we value privacy and are committed to safeguarding any privileged information we may obtain. This Privacy Policy explains how we gather, use, and protect your information.

This policy is divided into sections based on how you interact with us:

- **General Privacy Information:** Applies to everyone.
- **Privacy for our Marketing Activities:** Applies when you visit our website, engage with us on social media, or sign up for events.
- **Privacy for our AI-Powered Applications:** Applies when you use our AI-powered applications, such as the College Companion[™] ("CoCo[™]") App Suite (including CoCo Courses[™], CoCo Careers[™], and CoCo Communicate[™]) and Economics Agent[™].

General Privacy Information

This section applies to all interactions with Gray DI, encompassing the collection and processing of personal data detailed in the sections that follow.

Your Privacy Rights and Responsibilities

- **Opting out of Marketing:** You can stop receiving marketing emails from us at any time by using the "unsubscribe" link included in each message.
- **Access and Corrections:** All users have the right to request access to a copy of your personal information, the right to request correction of inaccurate information, and the right to request the permanent deletion of your information from our systems.
- **Exercise of Rights:** To exercise these rights, please email us at info@graydi.us, or contact us at the mailing address listed below. Exception: CoCo Communicate[™] users, please see instructions for contacting Yoodli below.

Data Retention and Disposal

We keep personal information for as long as needed to achieve the purposes for which it was obtained.

- **Marketing Information:** Data is retained until you request account deletion.
- **AI Application Data:** Data is retained for the duration of user access to the service or as required by the subscribing institution.

- **Deletion Requests:** Users may request account deletion. Upon request or when no longer needed, user information is securely and permanently deleted or segregated until such time deletion is possible.

In certain instances, we retain data for legal, regulatory, or law enforcement purposes. Upon conclusion of those instances, we delete the data.

Children’s Privacy

Our website and services are not directed to individuals under the age of 16. We do not knowingly store, process, or transmit personal information from children. At such time Gray DI is able to review and confirm the existence of information from a minor, it will be securely deleted in a timely manner.

Data Security

Gray DI has implemented and continuously improves an information security management system aligned with ISO 27001:2022 and SOC 2 Type II standards.

- **Safety Monitoring:** For our AI apps, we use certain gatekeeping and content monitoring tools that screen and protect interactions.
- **Customer Support:** We link encrypted identifiers to our customer service platform to allow our team to assist students with questions about the CoCo application.

However, please note that no method of transmitting or storing data is completely secure.

Privacy for our Marketing Activities

This section applies to information obtained through our public websites (graydi.us, robertgrayatkins.com), related social media channels (e.g., LinkedIn), and other marketing activities, such as event sign-ups.

Information We Obtain

We obtain the minimum personal information necessary to fulfill the intended purpose, which you provide voluntarily. This includes:

- **Contact Information:** First name, last name, and email address when signing up for our events or requesting information about our products and services.
- **Other Voluntary Information:** When you engage with us, we may also obtain other information you choose to provide, such as company or institution, role, and/or phone number.

How We Use Your Information

The information is used to communicate about our offerings and services. These uses include:

- Sending the requested information.
- Managing registration for events and sending related updates.
- Making you aware of future events or product opportunities that may be relevant to you.

No Outside Selling or Sharing

We do not sell or divulge your contact information. We do not share your personal information with third parties for their direct marketing purposes.

Privacy for our AI-Powered Applications

This section applies to users of AI-powered applications originated by Gray DI: CoCo Courses™, CoCo Careers™, and Economics Agent™. For privacy related to CoCo Communicate™, please see that separate section below.

Gray DI's Approach to AI-Powered Applications

For our AI-powered applications, we use pre-trained, third-party generative AI models like Gemini and Open AI. Our AI-powered applications are grounded on source materials you supply, and system prompts that we define and control.

- Economics Agent™ and CoCo Courses™ operate within closed systems.
- CoCo Careers™ is connected to the internet to generate responses to provide relevant links for the user.

In all cases, our applications do not share user inputs with the open internet.

The third-party AI models that we use do not learn from or retain any data you input when interacting with the services. Your inputs remain isolated in a licensed, secure enclave, with logical access restrictions; they are not used to inform the underlying language model's general knowledge or future training.

PES Economics and Outcomes™: Economics Agent™

- The Economics Agent™ connects authorized users directly to their institution's specific instance of PES Economics and Outcomes™. There is no direct connection to the institution's systems, and data have been deidentified, aggregated, and reviewed by our analysts and your institutional representatives.
- Access to PES Economics and Outcomes™ and Economics Agent™ is limited to non-student users who have been authorized by the subscribing institution.
- Economics Agent™ does not obtain personal information from users other than the specific queries entered into the chat.
- Individual users can view only their own chat queries and responses.

CoCo™ Apps: CoCo Courses™ and CoCo Careers™

- We obtain name and email provided by the student, and school and course information provided by the institution.
- Students may have the ability to upload files and to share their microphone and camera to interact with the application.
- Instructors, advisors, and authorized college staff may view student chats and ratings for academic, guidance, and support purposes
- To provide full application functionality, we may process your inputs using OCR (e.g., for PDFs) and maintain chats within original and translated languages. When microphone and camera features are utilized, speech may be converted to text and stored within the chat history; audio and video data are not saved.
- CoCo Careers™ only:
 - CoCo Careers™ creates summarized "memories" from your conversations. These snapshots persist between sessions to personalize future interactions. Users can view, edit, or delete these memories at any time.

- Coco Careers™ may look up anonymized data by occupational code in our proprietary database to retrieve relevant market information; this process does not involve the sharing of personal information.

User Responsibilities: The intent, design, and configuration of CoCo™ applications is to enhance and support academic and career-related purposes. **Do not share or submit any confidential or sensitive personal information, such as financial details, health information, or government-issued identifiers.**

CoCo™ App: CoCo Communicate™

CoCo Communicate™ is powered by our third-party partner, Yoodli Roleplays ("Yoodli"). Gray DI does not directly obtain or store the video/audio recordings or performance feedback for this specific app; this data is collected directly by Yoodli. Use of the CoCo Communicate™ application is governed by Yoodli's privacy practices, which can be reviewed at <https://yoodli.ai/privacy>. Any requests to access, correct, or delete information within CoCo Communicate™ must be directed to Yoodli.

Changes to This Privacy Policy

This Privacy Policy will be reviewed annually by Gray DI and may be updated more to reflect changes in our practices or to comply with legal requirements. We will notify you of any changes by updating the "Effective Date" at the top of this policy.

Contact Us

If you have any questions or concerns about this Privacy Policy or how we safeguard personal information, please contact us by email at info@GrayDI.us, or write to us at the following address:

Gray Decision Intelligence, Inc.
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Concord, MA 01742