



GRAYTM
DECISION INTELLIGENCE

Gray DI Privacy Policy

Effective Date: August 18, 2025

Purpose and Scope

At Gray Decision Intelligence, Inc. ("we," "our," "us," "Gray DI"), we value privacy and are committed to protecting the limited personal information we collect. This Privacy Policy explains how we collect, 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 Applications:** Applies when you use our AI-powered applications, such as College CompanionTM Apps.

General Privacy Information

This section applies to all interactions with Gray DI that involve the collection of personal data described above.

Data Retention and Disposal

We keep your personal information for as long as needed to achieve the purposes for which it was collected. For marketing information, that is, until you choose to unsubscribe. Upon request or when no longer needed, your information is securely and permanently deleted.

Your Privacy Rights & Responsibilities

- **Opting Out of Marketing:** You can stop receiving marketing emails from us at any time by using the "unsubscribe" link included in every message.
- **All Users:** You 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. To exercise these rights, please email us at info@GrayDI.us or contact us at the mailing address listed below.

Children's Privacy

Our website and services are not directed to individuals under the age of 16. We do not knowingly collect personal information from children. If we become aware that we have inadvertently collected such information, we will take steps to delete it promptly.

Data Security

Gray DI has implemented, matured, and continuously improved an information security management system aligned with the highest standards of security, confidentiality, and privacy. We leverage our ISO 27001:2022 certification and SOC 2 Type 2 attestation (including Security, Confidentiality, Privacy, and Processing Integrity Trust Services Criteria) to define and implement these controls. For our AI apps, we use specific gatekeeping tools (e.g., Model Armor) that screen, filter, and protect interactions. However, please note that no method of transmitting or storing data is completely secure.

Privacy for our Marketing Activities

This section applies to information collected through our public website (GrayDI.us), related social media channels (e.g., LinkedIn), and other marketing activities, such as event sign-ups.

Information We Collect

We collect only the minimum personal information necessary to fulfill the intended purpose, and you provide this information to us voluntarily. This includes:

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

Use of Information

We use this information solely to communicate with you about our offerings. These uses include:

- Sending you the information you have requested.
- Managing your registration for events and sending you related updates.
- Contacting you about future events or product opportunities that may be relevant to you.

Data Sharing

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

Privacy for our Applications

This section applies to users of our AI applications.

Our Approach to Data and AI

- Gray DI does not train its own large language models. We use pre-trained, third-party generative AI models (e.g., Gemini, OpenAI).
- Our AI applications operate within closed systems and are "grounded" on predetermined source materials and system prompts that we define and control, rather than having an AI model access or search the open internet for information.
- The third-party AI models that we use do not learn from, or retain, any of the data you input when interacting with the service. The data from these inputs remain isolated in a licensed, secure enclave, with logical access restrictions, and are not used to inform the AI's general knowledge or future training.

College Companion™ Apps: Course Companion™ and Career Companion™

Information We Collect

We collect only the minimum personal information necessary to fulfill the intended purpose, and you provide this information to us voluntarily. This includes:

- First and last name, email address, school name, course, course section (Course Companion™)
- User input you provide in the chat, which may include
 - Your questions about course content (Course Companion™)

- Employment and education-related information shared by you (Career Companion™)
- Data about your app usage, including the features you interact with and the time you spend using the app
- User feedback and ratings

Use of Information

- We collect this information to authenticate your access, provide the service to you, monitor the usage of, maintain, and improve the app
- For our AI apps, we use specific gatekeeping tools (e.g., Google Model Armor) that screen, filter, and protect the app from malicious prompts and users from out-of-bounds responses. Our developers may review activity and alerts to maintain and improve the app

Data Sharing

- Your inputs are processed by our third-party AI partners to generate responses to you
- Instructors and authorized college staff can view your chats and ratings for academic, guidance, and support purposes.
- Ratings from students and authorized college staff are used to tune the app

User Control and Responsibilities

- Career Companion™ creates "memories" based on your conversations. You have the ability to view, edit, or delete memories at any time.
- Our applications are designed for academic and career-related purposes. We advise you to consider what is appropriate to share and not to submit sensitive personal information (such as financial details, health information, or government-issued identifiers) that is not relevant to these purposes.

College Companion™ App: Communication Companion™

The Communication Companion™ application ("the App") is a specialized service powered by our third-party partner, Yoodli Roleplays ("Yoodli"). When you use the App, the collection, use, and sharing of your information are governed by Yoodli's privacy practices, as described below.

Information We Collect

Gray DI does not directly collect, process, or store the personal data you provide when using the Communication Companion™ App. All data, including any video or audio recordings, transcripts, and performance feedback, is collected directly by Yoodli.

According to Yoodli, the types of information they collect to operate the App may include:

- **User-Generated Content:** Video and audio recordings of your practice sessions, and the resulting AI-generated transcripts and analytics.
- **Account Information:** Basic information required to create and manage your user profile within the App, which may include your name and email address.
- **Usage and Technical Data:** Information about how you interact with the App, such as features used, time spent, and device information.

For a complete and authoritative description of the data Yoodli collects, please review Yoodli's Privacy Policy here: <https://yoodli.ai/privacy>

Use of Information

As the data controller for the App, Yoodli uses the information it collects to:

- Provide, operate, and maintain the functionality of the Communication Companion™ App.
- Analyze your speech and communication patterns to provide you with personalized feedback

- and coaching.
- Improve its AI models, products, and services. According to Yoodli, this is often done using de-identified or aggregated data.
- Troubleshoot technical issues and provide customer support for the App.

Gray DI does not have access to your individual recordings or performance data and does not use this information for any purpose.

Please refer to Yoodli's Privacy Policy for detailed information on how they use your data.

Data Sharing

Since Gray DI does not collect or possess the data generated from your use of the Communication Companion™ App, we do not share this specific data with any other parties.

Yoodli is responsible for its own data-sharing practices. Yoodli may share data with its own service providers (sub-processors), such as cloud hosting providers (e.g., AWS, Google Cloud), to operate the App. Yoodli's Privacy Policy will detail their data-sharing practices, including the categories of third parties with whom they may share information and the conditions under which they might disclose data, such as for legal compliance.

User Control and Responsibilities

Because your data within the Communication Companion™ App is controlled by Yoodli, any requests to exercise your data rights—such as the right to access, correct, or delete your personal information—must be directed to Yoodli. Their Privacy Policy will provide instructions on how to submit such requests.

While Gray DI can assist in directing you to the appropriate Yoodli contact, Yoodli is ultimately responsible for responding to and processing your data subject requests related to the App.

You are responsible for the content you choose to submit while using the App. We advise you not to record, recite, or otherwise share any sensitive personal information that is not necessary for the communication practice and coaching service.

Changes to This Privacy Policy

We may update this Privacy Policy from time to time 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 our collection, use, or protection of your 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