



GRAY[™]
DECISION INTELLIGENCE

Gray DI Privacy Policy

Policy Owner: COO

Effective Date: November 24, 2025

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 Applications: Applies when you use our AI-powered applications, such as the College Companion[™] Apps and Economics Agent.

General Privacy Information

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

Data Retention and Disposal

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

- For marketing information, that is until you choose to unsubscribe.
- For information within our AI applications, data is retained for the duration of user access to the service, or for College Companions[™] apps as otherwise required by the subscribing institution.

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.

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 each 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 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, 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 certain gatekeeping and content monitoring 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 obtained through our public website (GrayDI.us), related social media channels (e.g., LinkedIn), and other marketing activities, such as event sign-ups.

Information Attributes

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.

Use of 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.

Data Inputs

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 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 are "grounded" on predetermined source materials and system prompts that we define and control.

- Economics Agent and Course Companion™ operate within closed systems.
- Career Companion™ 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, and AI models do not search the 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 underlying large language model's general knowledge or future training.

PES Economics: 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.
- 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. User activity may be used to improve the service; however, Economics Agent chat interactions are not shared further and are not used to train any Large Language Models.

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

Information Attributes

We obtain the minimum personal information necessary to fulfill the intended purpose. These are provided both by the student and by the subscribing institution and include:

- Account and institution information: First and last name, email address, and username provided by the student, as well as school name, course, course section information provided by the subscribing institution.
- User Generated Content: This includes:
 - User input provided in the chat.
 - Voluntarily uploaded files, such as PDFs or images.
- Data about app usage, including the features users interact with and the time spent using the app
- User feedback and ratings

Use of Information

This information is used to authenticate user access, provide the service, monitor the usage of, maintain, and improve the app. For our AI apps, we use certain gatekeeping and content monitoring tools (e.g., Google Model Armor) that screen, filter, and protect the app from malicious prompts and users from out-of-bounds responses. User activity may be reviewed to maintain and improve our service.

Data Inputs

Inputs are processed by our third-party AI partners to generate responses for the user.

- Instructors, advisors, and authorized college staff may view student chats and ratings for academic, guidance, and support purposes.
- Ratings from students and authorized college staff may be used to tune the applications.

User Control and Responsibilities

- Career Companion™ creates "memories" based on user conversations. You have the ability to view, edit, or delete memories at any time.
- The intent, design, and configuration of our applications is to enhance and support academic and career-related purposes. Do not share or submit confidential or 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 user information are governed by Yoodli's privacy practices, as described below.

Information Attributes

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

The Yoodli Privacy Policy defines information they collect to include:

- User-Generated Content: Video and audio recordings of user practice sessions, and the resulting AI-generated transcripts and analytics.
- Account Information: Basic information required to create and manage user profile within the App, which may include 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 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 speech and communication patterns to provide the user with personalized feedback and coaching.
- Improve its AI models, products, and services.
- Troubleshoot technical issues and provide customer support for the App.

Gray DI does not have access to individual user recordings or performance data and does not use this information for any purpose. Please refer to Yoodli's Privacy Policy for detailed information on their handling of user data.

Data Inputs

Since Gray DI does not obtain or possess the data generated from 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 provides details on 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

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. 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. The application is designed as a communication practice and coaching service. Do not record, recite, or share any sensitive personal information, such as financial details, health information, or government-issued identifiers, that is not relevant to these purposes.

Changes to This Privacy Policy

This Privacy Policy will be reviewed and approved annually by Gray DI. Additionally, if necessary, Gray DI may update this Privacy Policy 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.
355 Sudbury Rd
Concord, MA 01742