

# Privacy Policy

Effective date: July 02, 2026

At VR EVAL, Inc. [“We”, “Us”, “Our”, or “Coming Home”], We take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. **By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that We will collect, use and share your information as described in this Privacy Policy.**

Remember that your use of Coming Home’s Services is at all times subject to our [Terms of Use](#), which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

You may print a copy of this Privacy Policy by clicking here. If you have a disability, you may access this Privacy Policy in an alternative format by contacting [customersupport@cominghome.ai](mailto:customersupport@cominghome.ai).

## **What this Privacy Policy Covers**

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services. “Personal Data” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don’t own or control or people we don’t manage.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to various laws in the United States and the General Data Protection Regulation which applies across the European Union (including in the United Kingdom), and We are responsible as “controller” of that personal information for the purposes of those laws.

## **What are the basics of using Coming Home?**

Coming Home partners with various organizations (“Care Providers”) who provide access to their users (“Client Users”). Not all Care Providers are licensed mental health professionals and Coming Home makes no assurances of the quality of care or services that a Care Provider will provide. These terms apply to both Care Providers and Client Users.

## **Personal Data**

### *Categories of Personal Data We Collect*

This chart details the categories of Personal Data that we collect and have collected over the past 12 months:

<b><u>Category of Personal Data</u></b>	<b><u>Examples of Personal Data We Collect</u></b>	<b><u>Categories of Third Parties With Whom We Share this Personal Data:</u></b>
<b>Profile or Contact Data</b>	First and last name; Email; Phone number; Unique identifiers such as passwords	<ul style="list-style-type: none"><li>● Service Providers;</li><li>● Analytics Partner;</li><li>● Business Partners;</li></ul>

## Privacy Policy

		<ul style="list-style-type: none"> <li>● Parties You Authorize, Access or Authenticate</li> </ul>
<b>Payment Data</b>	<ul style="list-style-type: none"> <li>● Payment card type;</li> <li>● Last 4 digits of payment card;</li> <li>● Billing address, phone number, and email</li> </ul>	<ul style="list-style-type: none"> <li>● Service Providers (specifically our payment processing partner, currently Stripe, Inc.)</li> </ul>
<b>Commercial Data</b>	<ul style="list-style-type: none"> <li>● Purchase history;</li> <li>● Consumer profiles;</li> </ul>	<ul style="list-style-type: none"> <li>● Service Providers;</li> <li>● Analytics Partners;</li> <li>● Business Partners;</li> <li>● Parties You Authorize, Access or Authenticate</li> </ul>
<b>Device/IP Data</b>	<ul style="list-style-type: none"> <li>● IP address;</li> <li>● Device ID;</li> <li>● Domain server;</li> <li>● Type of device/operating system/browser used to access the Services</li> </ul>	<ul style="list-style-type: none"> <li>● Service Providers;</li> <li>● Analytics Partners</li> <li>● Business Partners</li> <li>● Parties You Authorize, Access or Authenticate</li> </ul>
<b>Web Analytics</b>	<ul style="list-style-type: none"> <li>● Web page interactions;</li> <li>● Referring webpage/source through which you accessed the Services;</li> <li>● Non-identifiable request IDs;</li> <li>● Statistics associated with the interaction between device or browser and the Services</li> </ul>	<ul style="list-style-type: none"> <li>● Service Providers</li> <li>● Analytics Partners</li> <li>● Business Partners</li> <li>● Parties You Authorize, Access or Authenticate</li> </ul>
<b>Consumer Demographic Data</b>	<ul style="list-style-type: none"> <li>● Age / date of birth;</li> <li>● Zip code;</li> <li>● Gender;</li> <li>● Race;</li> <li>● Ethnicity;</li> </ul>	<ul style="list-style-type: none"> <li>● Service Providers</li> <li>● Analytics Partners</li> <li>● Business Partners</li> <li>● Parties You Authorize, Access or Authenticate</li> </ul>
<b>Geolocation Data</b>	<ul style="list-style-type: none"> <li>● IP-address-based location information;</li> </ul>	<ul style="list-style-type: none"> <li>● Service Providers</li> <li>● Analytics Partners</li> <li>● Business Partners</li> <li>● Parties You Authorize, Access or Authenticate</li> </ul>
<b>Inferences Drawn From Other Personal Data Collected</b>	<ul style="list-style-type: none"> <li>● Profiles reflecting user attributes;</li> <li>● Profiles reflecting user behavior;</li> </ul>	<ul style="list-style-type: none"> <li>● Service Providers</li> <li>● Analytics Partners</li> <li>● Business Partners</li> <li>● Parties You Authorize, Access or Authenticate</li> </ul>
<b>Other Identifying Information that You Voluntarily Choose to Provide</b>	<ul style="list-style-type: none"> <li>● Identifying information in emails or letters you send us</li> </ul>	<ul style="list-style-type: none"> <li>● Service Providers</li> <li>● Analytics Partners</li> <li>● Business Partners</li> <li>● Parties You Authorize, Access or Authenticate</li> </ul>

### Categories of Sources of Personal Data

## Privacy Policy

We collect Personal Data about you from the following categories of sources:

- **You**
  - When you provide such information directly to us.
    - When you create an account or use our interactive tools and Services.
    - When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires.
    - When you send us an email or otherwise contact us.
  - When you use the Services and such information is collected automatically.
    - Through Cookies (defined in the “Tracking Tools, Advertising and Opt-Out” section below).
    - If you download our mobile application or use a location-enabled browser, we may receive information about your location and mobile device, as applicable.
    - If you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Services, such as information regarding when you are logged on and available to receive updates or alert notices.
  - When you enable access to a third-party application or device.
    - If you enable access to a third-party device that collects or shares data with us.
    - When you log into the services from a third-party account, such as a social media account or mobile phone account.
  - When you purposely share your information.
    - You may choose to share information with other users including achievements, content, or personal information about your health and wellness.
- **Third Parties**
  - Care Providers
    - Your usage of the Services at this time is expressly dependent on a Care Provider relationship.
  - Vendors
    - We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.
    - We may use vendors to obtain information to generate leads and create user profiles.

### Our Commercial or Business Purposes for Collecting Personal Data

- **Providing, Customizing and Improving the Services**
  - Creating and managing your account or other user profiles.
  - Processing orders or other transactions; billing.
  - Providing you with the products, services or information you request.
  - Meeting or fulfilling the reason you provided the information to us.
  - Providing support and assistance for the Services.
  - Improving the Services, including testing, research, internal analytics and product development.
  - Personalizing the Services, website content and communications based on your preferences.
  - Doing fraud protection, security and debugging.

## Privacy Policy

- o Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the “CCPA”) and the General Data Protection Regulation “GDPR”
- **Corresponding with You**
  - o Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Coming Home or the Services.
  - o Sending emails and other communications according to your preferences or that display content that we think will interest you.
- **Meeting Legal Requirements and Enforcing Legal Terms**
  - o Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
  - o Protecting the rights, property or safety of you, Coming Home or another party.
  - o Enforcing any agreements with you.
  - o Responding to claims that any posting or other content violates third-party rights.
  - o Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

### **PHI Data**

Protected Health Information (PHI) collected is limited solely to information you provide directly with our application to speak directly to your Care Providers. No PHI is ever used in marketing, analytics, error logs or AI training. All PHI remains encrypted and access is limited solely to those needed to provide the Services to you. All Care Providers and vendors are subject to Business Associate Agreements that follow strict HIPAA compliance and procedures. You may request deletion or access your data at any time.

### **AI Usage**

We utilize AI to help provide suggestions within the application. These services are driven by an automated chat agent provided by third party vendor that can answer user questions automatically and is subject to their privacy policy. Data provided is not utilized to train AI agents and remains personal to you. Data you provide is utilized solely to answer the questions you are asking to help provide the services requested. This AI agent does not impact your ability to utilize other services and is not a mandatory feature you must use. Your data is only retained for as long as it is necessary for the purposes set out in this Privacy Policy. You are explicitly requested to not provide any information that might be deemed sensitive personal information including health sensitive information covered by HIPPA or any similar privacy laws. Depending on your settings and permissions, certain high-risk messages may be shared with Care Providers if Val detects language suggesting possible risk of harm to yourself or others.

### **How We Share Your Personal Data**

## Privacy Policy

Coming Home does not sell personal information to advertisers or data brokers. We may share information as described below.

We disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may constitute a “sale” of your Personal Data. For more information, please refer to the state-specific sections below.

- **Service Providers.** These parties help us provide the Services or perform business functions on our behalf. They include:
  - Hosting, technology and communication providers.
  - Product fulfillment and delivery providers.
  - Payment processors.
  - AI chat agents
- **Analytics Partners.** These parties provide analytics on web traffic or usage of the Services. They include:
  - Companies that track how users found or were referred to the Services.
  - Companies that track how users interact with the Services.
- **Business Partners.** These parties partner with us in offering various services. They include:
  - Businesses that you have a relationship with.
  - Companies that we partner with to offer joint promotional offers or opportunities.

### Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

### Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

### Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you.

### Notice to Corporate Partner Employee Users

We may from time-to-time partner with companies to provide services to their employees as part of a corporate benefit plan. If we engage in such activities, you will be provided with discounted access to premium Services on behalf of your employer should you choose to opt-in. In these scenarios, We provide Your employer with aggregated summary reports that are fully anonymized showing how often

## Privacy Policy

employees use our services, such as the number of logins, duration of sessions, and general engagement metrics. We do not share the content of your communications or any Personal Information beyond what is necessary for reporting and performance purposes. We share this information to help your employer understand service usage and to improve access and support for employees.

### **Tracking Tools, Advertising and Opt-Out**

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data— usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Services do not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- **Essential Cookies.** Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- **Functional Cookies.** Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Retargeting/Advertising Cookies.** Retargeting/Advertising Cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. For more information about this, please see the section below titled “Information about Interest-Based Advertisements.”

You can decide whether or not to accept Cookies through your internet browser’s settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To explore what Cookie settings are available to you, look in the “preferences” or “options” section of your browser’s menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/>.

### **Information about Interest-Based Advertisements:**

We may serve advertisements, and also allow third-party ad networks, including third-party ad servers, ad agencies, ad technology vendors and research firms, to serve advertisements through the Services. These advertisements may be targeted to users who fit certain general profile categories or display certain preferences or behaviors (“Interest-Based Ads”). Information for Interest-Based Ads (including Personal Data) may be provided to us by you, or derived from the usage patterns of particular users on the Services

## Privacy Policy

and/or services of third parties. Such information may be gathered through tracking users' activities across time and unaffiliated properties, including when you leave the Services. To accomplish this, we or our service providers may deliver Cookies, including a file (known as a "web beacon") from an ad network to you through the Services. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Web beacons allow ad networks to view, edit or set their own Cookies on your browser, just as if you had requested a web page from their site.

We comply with the Digital Advertising Alliance ("DAA") Self-Regulatory Principles for Online Behavioral Advertising. Through the DAA and Network Advertising Initiative ("NAI"), several media and marketing associations have developed an industry self-regulatory program to give consumers a better understanding of, and greater control over, ads that are customized based on a consumer's online behavior across different websites and properties. To make choices about Interest-Based Ads from participating third parties, including to opt-out of receiving behaviorally targeted advertisements from participating organizations, please visit the DAA's or NAI's consumer opt-out pages, which are located at <http://www.networkadvertising.org/choices/> or [www.aboutads.info/choices](http://www.aboutads.info/choices).

### **Data Security and Retention**

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Data about you for as long as you have an open account with us or as otherwise necessary to provide you with our Services. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

### **Country Data Disclosures**

Your Personal Data may be disclosed to service providers outside of the immediate country or region You reside within. We are based within the United States and may use service providers within the United States, EU, Canada, UK, and Australia in order to provide services to those regions. At all times, Your Personal Data will be kept in accordance with the principles and terms of this Privacy Policy.

### **State Law Privacy Rights**

#### **California Resident Rights**

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at [customersupport@cominghome.ai](mailto:customersupport@cominghome.ai)

#### **Nevada Resident Rights**

## Privacy Policy

Coming Home does not sell any Personal Data. If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at [customersupport@cominghome.ai](mailto:customersupport@cominghome.ai) with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account.

### **Your Rights Under the CCPA**

You have the following rights as a California consumer:

- **Right to know** what personal information the business has collected about you, including:
  - The categories of personal information we have collected
  - The categories of sources from which the personal information is collected
  - The business or commercial purpose for collecting, selling, or sharing personal information
  - The categories of third parties to whom we disclose personal information –and–
  - The specific pieces of personal information we have collected about you.
- **Right to delete** personal information that we have collected from you with certain exceptions, including where the information is necessary to complete our transaction with you. [Subject to the exceptions set out below, on receipt of a verifiable request from you, we will:
  - Delete your personal information from our records;
  - Direct any service providers or contractors to delete your personal information from their records;
  - Direct third parties to whom the business has sold or shared your personal information to delete your personal information unless this proves impossible or involves disproportionate effort.

Please note that we may not delete your personal information if it is reasonably necessary to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;
- Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;

## Privacy Policy

- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
  - Comply with an existing legal obligation; or
  - Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.]
- 
- **Right to correct inaccurate personal information that we maintain about you.** Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate personal information.
  - **Right to opt-out of the sale or sharing** of your personal information
  - **Right to limit the use or disclosure** of your sensitive personal information
  - **Right not to receive discriminatory treatment** for exercising any of these rights. This means we cannot, among other things:
    - o Deny goods or services to you;
    - o Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
    - o Provide a different level or quality of goods or services to you; or
    - o Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.
    - o Please note that we may charge a different price or rate or provide a different level or quality of goods and/or services to you, if that difference is reasonably related to the value provided to our business by your personal information. We may also offer loyalty, rewards, premium features, discounts, or club card programs consistent with these rights or payments as compensation, for the collection of personal information, the sale of personal information, or the retention of personal information.

### **Your rights under PIPDEA**

To deliver services to you, it is sometimes necessary for us to share your personal information outside of Canada, e.g.:

- With our offices outside the Canada
- With your and our service providers located outside the Canada;
- If you are based outside the Canada; or

## Privacy Policy

- Where there is an international dimension to the services we are providing to you.

These transfers are subject to special rules under Canada data protection law.

You have the right to request access to and correction of the personal information we hold about you. To exercise these rights, please contact our Privacy Officer using the details provided below.

### **How to Exercise Your Rights.**

If you would like to exercise any of your rights as described in this Privacy Policy, please:

- Email us at [customersupport@cominghome.ai](mailto:customersupport@cominghome.ai)
- Please note that you may only make a CCPA-related data access or data portability disclosure request twice within a 12-month period.
- If you choose to contact directly by email/phone/in writing, you will need to provide us with:
  - o • Enough information to identify you (e.g., your full name, address and customer or matter reference number));
  - o • Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill); and
  - o • A description of what right you want to exercise and the information to which your request relates.
- We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on such person's behalf.
- Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

### **Keeping Your Personal Information Secure.**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so. PHI use and disclosure will be limited to the minimum amount required to accomplish the purpose

### **Changes to this Privacy Policy**

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on the Coming Home website, by

## Privacy Policy

sending you an email and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

### **Contact Information:**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact our privacy officer at:

- [www.cominghome.ai](http://www.cominghome.ai)
- [customersupport@cominghome.ai](mailto:customersupport@cominghome.ai)
- Care Of: Privacy Officer, Coming Home
- **1025 S Semoran BLVD**  
**STE 1-1089**  
Winter Park, FL 32792