

Synthetikos Privacy Policy

Last modified: 17 March, 2024

1. INTRODUCTION

- 1.1. Synthetikos Inc. (“**Synthetikos**”, “**we**”, “**us**”) respect your privacy and are committed to protecting it by complying with this policy.
- 1.2. This policy describes how we collect, use, disclose, and protect the personal information of subscribers to our mailing list, recipients of innovation and strategy resources, prospective clients, clients, and participants in client projects (“**you**”).
- 1.3. Please note that this Privacy Policy only applies where your personal information is collected, used, or processed for purposes determined by Synthetikos, and does not apply to our collection, use or processing of personal information in the course of preparing client delivery projects as a service to our clients. In such circumstances, our clients are responsible for processing information in accordance with their own privacy policies and practices, and otherwise complying with applicable data protection laws. When we act as a services provider to our clients, we will only process personal information according to the client’s instructions in accordance with our services agreements, or as otherwise required by applicable law. In the spirit of openness, we have nevertheless shared information about how personal information is generally collected, used and processed to provide such services. If you have any questions about the processing of your personal information in this context, or would like to make any requests regarding your information, you may contact the client or us (and we will forward your request or inquiry to the client on your behalf).
- 1.4. We will only use your personal information in accordance with this policy unless otherwise required by applicable law.
- 1.5. Privacy laws in Canada generally define "Personal Information" as any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact, or locate a single person.

This policy applies to information we collect, use, or disclose about you through our provision of services to businesses or organizations that disclose your personal information to us.

- 1.6. Please read this policy carefully to understand our policies and practices for collecting, processing, and storing your information. This policy may change from time to time (see [Changes to Our Privacy Policy](#)).

2. PRIVACY BY DESIGN

- 2.1. We adhere to the principles of Privacy by Design (PbD), which guides all the information we collect:
 - (a) **Proactive not Reactive; Preventative not Remedial.** Anticipate, identify and prevent privacy invasive events before they occur.
 - (b) **Privacy as the Default Setting.** Build in the maximum degree of privacy into the default settings for any system or business practice. Doing so will keep a user’s privacy intact, even if they choose to do nothing.
 - (c) **Privacy Embedded into Design.** Embed privacy settings into the design and architecture of information technology systems and business practices instead of implementing them after the fact as an add-on.
 - (d) **Full Functionality — Positive-Sum, not Zero-Sum.** Accommodate all legitimate interests and objectives in a positive-sum manner to create a balance between privacy and security because it is possible to have both.
 - (e) **End-to-End Security — Full Lifecycle Protection.** Embed strong security measures to the complete lifecycle of data to ensure secure management of the information from beginning to end.

- (f) **Visibility and Transparency — Keep it Open.** Assure stakeholders that privacy standards are open, transparent and subject to independent verification.
 - (g) **Respect for User Privacy — Keep it User-Centric.** Protect the interests of users by offering strong privacy defaults, appropriate notice, and empowering user-friendly options.
- 2.2. In addition to the seven PbD principles, we adhere to the practice of **Data Minimization**. Collection of data should be minimized as much as possible, and technologies should default to have users be non-identifiable and non-observable, or, if absolutely necessary, minimized.

3. INFORMATION WE COLLECT ABOUT YOU

- 3.1. We collect, store and use certain information from or about you for the purposes described below – and only when the purpose cannot be achieved without your information:
- (a) For the purpose of maintaining an opt-in **Mailing List** for the Synthetikos newsletter, we collect and use the name and email address of members.
 - (b) For the purpose of sharing physical copies of **Innovation and Strategy Resources**, including the Methods for Messes method cards, we collect and use the name, email address and mailing address of those who request these resources.
 - (c) For the purpose of **Business Development** with prospective clients, we collect and use prospective clients' name, title, email address and phone number.
 - (d) For the purpose of **Project Delivery** with clients, we collect and use clients' name, title, email address and phone number.
 - (e) For the purpose of **Participatory Co-Design** with participants in client delivery projects, we collect and use prospective participants' name, email address, phone number. For prospective participants who consent to participate in co-design activities, we collect and use information in anonymous surveys, de-identified interview transcripts, and co-design workshops run according to Chatham House Rules.

4. INFORMATION WE COLLECT IN THE PUBLIC DOMAIN

- 4.1. For the purpose of Business Development with prospective clients, we collect and use prospective clients' name, title, email address and phone number through sites such as LinkedIn and government contact directories.
- 4.2. For the purpose of **Literature Review Research** during client project delivery, we collect and use the name, title, and email address of authors and participants in relevant innovation projects. These projects are presented in the public domain including but not limited to peer reviewed articles, conference proceedings, blogs and podcasts.

5. HOW WE COLLECT INFORMATION ABOUT YOU

- 5.1. We directly collect information for our Mailing List and to share Innovation and Strategy Resources through our web site <http://synthetikos.com>.
- 5.2. With your express consent, we directly collect information for Business Development, Project Delivery and Participatory Co-Design that you share with us during virtual meetings with us using AI-generated summaries, transcripts, and highlights.
- 5.3. We provide services to other businesses and organizations, who may provide us with your name, title, email address and phone number for the purpose of inviting you to participate in the client delivery project.
- 5.4. We indirectly collect information through the public domain via web searches, social media and sites such as Google Scholar.

6. HOW WE USE YOUR INFORMATION

- 6.1. We use information that we collect about you or that you provide to us, including any personal information:

- (a) To provide you with information, products, or services that you request from us.
- (b) To fulfill the purposes for which you provided the information or that were described when it was collected.
- (c) To carry out our obligations and enforce our rights arising from any contracts with you, including for billing and collection or to comply with legal requirements.
- (d) For any additional purpose only with your additional informed consent.

7. DISCLOSURE OF YOUR INFORMATION

- 7.1. We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.
- 7.2. We may disclose personal information that we collect or you provide as described in this privacy policy:
 - (a) To contractors, service providers, and other third parties we use to support our business (such as workshop facilitators) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.
 - (b) To fulfill the purpose for which you provide it.
 - (c) With your informed consent.
- 7.3. We may also disclose your personal information:
 - (a) To comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law.
 - (b) To enforce any of our rights or apply our terms of agreements, including for billing and collection purposes.
 - (c) If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Synthetikos, our customers, or others.

8. TRANSFERRING YOUR PERSONAL INFORMATION

- 8.1. We may transfer personal information that we collect or that you provide as described in this policy to contractors, service providers, and other third parties we use to support our business and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.
- 8.2. We may process, store, and transfer your personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. This includes but is not limited to the use of major cloud storage services based in the United States. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country. Whenever we engage a service provider, we require that its privacy and security standards adhere to this policy and applicable Canadian privacy legislation.

9. DATA SECURITY

- 9.1. The security of your personal information is very important to us. We maintain appropriate physical, organizational, and technological safeguards against unauthorized access, unauthorized disclosure, theft, or misuse appropriate to the sensitivity of such personal information.

10. DATA RETENTION

- 10.1. Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve

the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

11. ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

- 11.1. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes. By law you have the right to request access to and to correct the personal information that we hold about you.
- 11.2. If you want to review, verify, correct, or withdraw consent to the use of your personal information you may send us an email at eleanor@synthetikos.com to request access to, correct, or delete any personal information 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.
- 11.3. We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.
- 11.4. We will provide access to your personal information, subject to exceptions set out in applicable privacy legislation. Examples of such exceptions include:
 - (a) Information protected by solicitor-client privilege.
 - (b) Information that is part of a formal dispute resolution process.
 - (c) Information that is about another individual that would reveal their personal information or confidential commercial information.
 - (d) Information that is prohibitively expensive to provide.
- 11.5. If you are concerned about our response or would like to correct the information provided, you may contact our Privacy Officer at eleanor@synthetikos.com.

12. WITHDRAWING YOUR CONSENT

- 12.1. Where you have provided your consent to the collection, use, and transfer of your personal information, you have the right to withdraw your consent. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. To withdraw your consent, contact us at eleanor@synthetikos.com.

13. CHANGES TO OUR PRIVACY POLICY

- 13.1. We reserve the right to amend this Privacy Policy for any or no reason, at any time, and from time to time in accordance with the terms of this Privacy Policy. If we make material changes to how we treat your personal information, we will notify you through a notice on the Website home page. You are responsible for ensuring we have an up-to-date, active, and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

14. CONTACT INFORMATION AND CHALLENGING COMPLIANCE

- 14.1. We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information, our compliance with this policy, and with applicable privacy laws. To discuss our privacy practices or compliance with this policy please contact our Privacy Officer by emailing eleanor@synthetikos.com