



SYNAPTITUDE BRAIN HEALTH INC.: Privacy Policy Statement

This Privacy Policy Statement applies exclusively to Synaptitude Brain Health Inc., the Synaptitude Brain Health website (www.synaptitudebrainhealth.com) and the Synaptitude Brain Health program. Synaptitude Brain Health Inc. is located at 701 West Georgia Street, Suite 1500, Vancouver, BC, Canada V7Y 1C6 and is referred to as “Synaptitude”, “we”, “us” or “our” within this Privacy Policy Statement.

This Privacy Policy Statement outlines how Synaptitude Brain Health Inc. collects, uses, stores, processes and generally handles your personal and brain health information. When you use the Synaptitude website, you agree to the policies and procedures outlined in this Privacy Policy Statement. If you would like to participate in the Synaptitude Brain Health program, please review this Privacy Policy Statement and the Participant Consent Form. When you consent to participate in the Synaptitude Brain Health program, you agree to all policies and procedures including, but not limited to, your consent to the collection, use, analysis and transfer of your personal information and health-related data as described in the Privacy Policy Statement and the Participant Consent Form.

This Privacy Policy Statement describes:

- Why Synaptitude collects your personal information and how it is used
- How Synaptitude secures your personal information
- Who Synaptitude allows to access your personal information
- How Synaptitude provides notice of any changes to the privacy policy
- Who you should contact if you have any questions.

1. Purposes of collecting your personal information

a. For general communication

Synaptitude Brain Health Inc. will collect your information for communication purposes, such as providing you with general information and distributing newsletters to you via our mailing list. This information includes, but is not restricted to, the following items:

- Name
- Email address

b. For account registration

If you consent to participate in the Synaptitude Brain Health program, Synaptitude will collect additional contact information to register you in the program, to establish your participant portal account and to provide you with information relating to your participation in the program. This information includes, but is not restricted to, the following items:

- Address
- Telephone number(s)
- Security questions and answers

c. For construction of your brain health profile

If you consent to participate in the program, Synaptitude will also collect biological samples and other health-related information to construct your brain health profile. This information includes, but is not restricted to, the following items:

- Date of birth
- Race/ethnicity/ancestry
- Personal medical history
- Lifestyle habits
- Dietary information
- Blood samples
- Genetic information
- Brain imaging scans
- Cognitive and emotional assessments
- Sensory and motor functional assessments
- Other self-reported assessments such as surveys, questionnaires and personality tests.

d. For referral purposes

If you refer anyone to the Synaptitude Brain Health program, we will request their name and email address so that we contact them directly. We will inform the person that you referred them to us and requested that we contact them regarding the program.

e. For customer service

If you contact us about the Synaptitude Brain Health program, we may collect information about your communication so that we can track and address your requests.

f. For tracking website activity

We may use cookies and other internet technologies to help us provide security, authenticate participants and customize your experience with the Synaptitude website. These cookies are data sent from our website and stored in your internet browser while you browse our site to help us track your activity and preferences on the site. You may control how cookies are used through your internet browser. However, if you reject cookies from our website, you may not be able to access all the features of the site. Third parties, which provide services to Synaptitude, may also use cookies through the Synaptitude website. You should review the policies of these third party sites to learn about how they use cookies.

2. Security of your personal information

Although it is impossible to absolutely guarantee the safety of your data, Synaptitude Brain Health Inc. is committed to ensuring the security, privacy, confidentiality and ethical use of your personal information and the contents of your brain health profile by implementing organizational, technical and physical safeguards. These include, but are not limited to:

- De-identification of your brain health profile and its contents so that third parties and external partners will not have access to personal information that could identify you, such as your name, address, email address or other contact details;
- Separation of your blood sample and your brain health profile from your name and personal information. Your name and personal information will not be stored with your

brain health profile or with your blood sample. Your brain health profile and your blood sample will be identified by unique alphanumeric codes which will be linked to your personal information in a separate and secure database. The database and its contents will not be accessible to any third party or external partner;

- Storage of your personal information and the data in your brain health profile on secure computer servers;
- Requirement that all Synaptitude employees sign an agreement to protect your privacy and confidentiality, to respect the sensitive nature of your information and to use your personal information appropriately;
- Informing all third parties and external partners about and making reasonable attempts to ensure that all third parties and external parties adhere to the security procedures outlined in the Privacy Policy Statement;
- Use of Secure Socket Layer (SSL) technology to encrypt all data transmission to and from our website and through the Synaptitude participant portal; and
- Use of anti-virus and internet security software to reduce the risk of security breaches and other online threats.

We strongly advise you to protect your login and account information that you use to access the Synaptitude participant portal. You should not disclose your participant account information to anyone who you do not trust. If you suspect or confirm unauthorized access to your participant account, you should notify Synaptitude immediately. You are also strongly advised to ensure that the anti-virus and internet security software on any computer you use to access your participant account is kept up-to-date.

Synaptitude is not responsible or liable for any personal information you release on your own, any information you indirectly release because of a security breach on a computer you use to access your participant account, or any information that you ask us to release to a third party.

3. Access to your personal information

a. Access by third parties

Synaptitude Brain Health Inc. may share your personal information and data in your brain health profile with third parties for the purposes of conducting scientific analyses and with external partners. To ensure that you remain anonymous, any data that is shared with any third party or external partner will not include any personal information that could identify you, such as your name or contact information. Your personal information and brain health profile will be kept confidential and will not be shared with other agencies unless required by law. Please note that any data collected by Synaptitude may be stored and processed in Canada or any other country in which Synaptitude, any third party or external partner maintains facilities and, therefore, your information may be subject to the laws of those other jurisdictions which may differ from the laws of the country where you live.

If Synaptitude merges with, is acquired by or has all or a portion of its assets sold, your information will likely be among the transferred assets if you are a current or former program participant at the time of the business transaction. In this event, your information would remain subject to the terms and conditions outlined in any pre-existing Privacy Policy Statement. Synaptitude will not otherwise sell, transfer or otherwise disclose your name or contact information to any third party without your explicit consent.

b. Access through your participant account

You will be provided access to your own data and reports through your participant account via the Synaptitude Brain Health Inc. website. However, you will not be allowed to delete content from your participant account. If you choose to share your data and reports with any third party, Synaptitude is not responsible or liable for any consequences that may arise from your disclosure of your information. You should always exercise caution when accessing your data and reports through your participant account and sharing your data and reports with others.

c. Updates to your personal information, communication or program status

If you wish to update your contact or registration information, you may send an email to communications@synaptitude.info.

If you wish to unsubscribe from the Synaptitude mailing list, you may send an email to communications@synaptitude.info.

If you wish to withdraw from the Synaptitude Brain Health program, you may send an email to communications@synaptitude.info. Once the email request has been processed, Synaptitude will delete your participant account. However, Synaptitude will retain a de-identified copy of your data after your withdrawal from the program.

4. Changes to the Privacy Policy Statement

When significant changes are made to this Privacy Policy Statement, a notice will be posted in this Privacy Policy Statement. You will be notified of the changes and when they take effect by email.

5. Contact Information

If you have any questions about this Privacy Policy Statement, please contact the Synaptitude Communications Officer by email at communications@synaptitude.info or by regular mail at:

Synaptitude Brain Health Inc.
Attn: Communications Officer
701 West Georgia Street, Suite 1500
Vancouver, BC
Canada V7Y 1C6

***This Privacy Policy Statement was last updated on January 17, 2017.**