



## OneSpan Corporate Data Protection Notice

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### I. Introduction to this Data Protection Notice

Protection of Personal Data is a core priority for OneSpan Inc. and its affiliated entities worldwide. OneSpan respects individual privacy and values the trust placed in us by our customers, job applicants, employees, suppliers, contractors, business partners, and members of the public. We are committed to collecting, using, and disclosing Personal Data in accordance with Applicable Data Protection Laws in the jurisdictions in which we operate, and to protecting such data against loss, unauthorized access, unlawful processing, errors, and security incidents.

This Corporate Data Protection Notice applies where OneSpan acts as a controller, meaning that OneSpan determines the purposes and means of processing Personal Data for its own internal business activities. In this context, the Notice explains how OneSpan collects, uses, stores, transfers, and otherwise processes Personal Data.

The Notice covers Personal Data processed when you interact with OneSpan, including:

- online or offline interactions;
- use of OneSpan websites and online platforms (Sites and Portals);
- marketing, sales, partner, recruitment, or corporate communications;
- participation in events, webinars, demonstrations, or trials; and
- any other direct interactions with OneSpan (Other Interactions).

Personal Data may be collected directly from you, obtained from publicly available sources (including professional social media), or received from third parties, where permitted under the Applicable Data Protection Laws.

This Notice does not apply to the processing of Personal Data carried out by OneSpan on behalf of customers in its role as processor in connection with the use of OneSpan products and services. Such processing is governed by the Applicable

Product Privacy Notice and the relevant contractual data processing arrangements, which are available via the Privacy Center.

The applicability of this Notice is subject to the Applicable Data Protection Laws in your jurisdiction. As OneSpan operates globally, certain legal references contained in this Notice may not apply to all individuals or in all countries.

Before accessing or using the Sites, or engaging in Other Interactions with OneSpan, you are encouraged to read this Notice together with the applicable Terms of Use. If you do not agree with OneSpan's privacy practices, you should refrain from using the Sites or participating in Other Interactions and should not provide Personal Data to OneSpan. Where permitted under Applicable Data Protection Laws, continued use of the Sites or participation in Other Interactions indicates that you have read and understood this Notice.

You are not legally required to provide Personal Data to OneSpan. However, if you choose not to provide certain information or do not consent to specific processing activities, OneSpan may be unable to provide access to certain content, services, support, or materials. You remain responsible for ensuring that the Personal Data you provide is accurate and up to date and are requested to notify OneSpan promptly of any changes.

The Sites may contain links to third-party websites or services that are outside OneSpan's control. OneSpan is not responsible for the privacy practices of such third parties, and you are encouraged to consult their respective privacy notices before providing any Personal Data.

This Notice is reviewed and updated periodically to reflect changes in legal requirements or OneSpan's processing activities. The most recent version is always available via the Privacy Center . Where legally required or otherwise appropriate, material changes will be communicated through the Sites, the Privacy Center, or other reasonable means.

## 2. Definitions

The following terms used in this Notice and Related Data Protection Documents have the meanings set out below:

Term	Definition
<b>Applicable Data Protection Laws</b>	Data protection and privacy laws applicable to OneSpan's processing of Personal Data in a specific jurisdiction and/or for a specific type of processing.
<b>Data Protection Laws</b>	Collectively: (i) applicable U.S. Data Protection Laws, (ii) the GDPR and corresponding laws in non-EU EEA countries that have adopted it, (iii) Brazil's Lei Geral de Proteção de Dados Pessoais, and (iv) any other applicable data protection legislation.
<b>GDPR</b>	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
<b>U.S. Data Protection Laws</b>	United States federal and state privacy and data protection laws applicable to the processing of Personal Data, including the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA), and other applicable state privacy laws.
<b>Personal Data</b>	Any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.
<b>Data Subjects</b>	Customers, job applicants, employees, suppliers, contractors, business partners, and members of the public whose Personal Data is processed by OneSpan.
<b>Cookie Technologies</b>	Passive data collection tools such as cookies, web beacons, pixels, tags, and similar technologies used to collect information automatically, as further described in the Cookie Statement.
<b>Sites</b>	Websites owned or controlled by OneSpan (including Portals) through which Personal Data is collected.
<b>Portals</b>	Online platforms owned or controlled by OneSpan, such as customer portal, partner portal, developer portal, training portal, support portal, or community portals.
<b>Chatbot</b>	The automated conversational application available on the OneSpan website in jurisdictions where it is activated, designed to simulate and process human

Term	Definition
	interactions and provide information, help, and assistance.
<b>Privacy Center</b>	The OneSpan website available at <a href="https://www.onespan.com/privacy-center">https://www.onespan.com/privacy-center</a> or any successor page serving the same purpose, containing privacy-related resources, notices, and information.
<b>Other Interactions</b>	Online or offline interactions through which OneSpan obtains Personal Data, other than via the Sites or Portals. This includes communications at events, trade fairs, telephone calls, and other direct interactions.
<b>OneSpan / we / us / our</b>	OneSpan Inc., a corporation organized under the laws of the State of Delaware, United States, and its affiliated entities worldwide. A list of OneSpan affiliates is available at the Privacy Center.
<b>Notice</b>	This Corporate Privacy Notice, as may be updated from time to time.
<b>Terms of Use</b>	The terms and conditions governing use of OneSpan websites, available at <a href="https://www.onespan.com/terms-of-use">https://www.onespan.com/terms-of-use</a> or any successor page.
<b>Preference Center</b>	Site at <a href="http://www.secure.onespan.com/Email-Validation-Web.html">www.secure.onespan.com/Email-Validation-Web.html</a> to view, manage, and update their OneSpan communication preferences.

Abbreviation	Full Form	Abbreviation	Full Form
<b>GDPR</b>	General Data Protection Regulation	<b>EEA</b>	European Economic Area
<b>CCPA</b>	California Consumer Privacy Act	<b>EU</b>	European Union

### 3. Information Security and Vulnerability Reporting

OneSpan recognizes the importance of protecting its information assets, including information relating to customers, job applicants, employees, pricing, strategy, management, and other sensitive business data. OneSpan maintains and continuously improves an information security management framework designed to safeguard the confidentiality, integrity, and availability of Personal Data and information systems. Additional details regarding OneSpan’s security program are available via the Privacy Center.

Despite appropriate safeguards, security incidents or vulnerabilities may occur. If you believe you have identified a security weakness or vulnerability affecting OneSpan systems, you are encouraged to report it to: [security@onespan.com](mailto:security@onespan.com), so that it can be investigated and addressed.

### 4. Related Data Protection Documents

You are encouraged to read this Notice carefully together with the Related Data Protection Documents made available in the Privacy Center all of which form an integral part of this Notice.

Document	Scope
Product Data Protection Notice	Personal Data processed in connection with customer use of OneSpan products and services
Employee Data Protection Notice	Internal Notice for OneSpan personnel (not published on the Privacy Center)
Talent Acquisition Data Protection Notice	Job candidates and recruitment activities
Global Biometric Data Protection	Biometric data for demonstrations, testing, proof of concept
Preference Center	Marketing communication preferences and opt-out
OneSpan Entity List	List of OneSpan affiliates/group companies and countries of operation
Cookie Statement	OneSpan’s use of Cookie Technologies and available controls are described in detail in the Cookie Notice, accessible at <a href="http://www.onespan.com/cookie-statement">www.onespan.com/cookie-statement</a> .
List of Regulatory Contacts and Representatives in the Privacy Center	Channels to contact OneSpan

## 5. Data Processing and Data Sharing

For transparency and clarity, detailed information on OneSpan's processing of Personal Data as a controller is provided in Annex 1 (Data Processing Overview). This annex sets out, for each category of Data Subject, the relevant categories of Personal Data, purposes of processing, applicable legal bases, sources of the data, retention periods, and applicable safeguards.

Information on how and with whom Personal Data may be shared, including categories of recipients, international transfers, and associated transfer mechanisms and protections, is described in Annex 2 (Data Sharing Overview). Both annexes form an integral part of this Notice and should be read together with it.

Personal Data processed by OneSpan is primarily handled internally and accessed only by employees and authorized personnel who require such access for legitimate business purposes. Where necessary for the purposes described in this Notice, Personal Data may be shared within the OneSpan group. All employees, contractors, and service providers are subject to confidentiality and data protection obligations designed to safeguard Personal Data.

Where OneSpan has a legitimate interest or a legal obligation, it may share limited professional information with suppliers, contractors, outsourcing partners, and business partners. Such sharing is restricted to what is necessary and may take place, in particular, to:

- comply with applicable legal, financial, accounting, or administrative obligations;
- respond to valid requests or legal processes from courts, law enforcement authorities, or other public bodies;
- organize, manage, and facilitate contractual collaborations and operational interactions between relevant parties; and
- protect the rights, property, or legitimate interests of OneSpan.

OneSpan may access, retain, transfer, or disclose Personal Data where necessary to:

- comply with applicable laws or respond to legally binding requests from competent authorities;
- protect customers and other individuals, including for the prevention of fraud, spam, or threats to life or physical safety;
- operate, maintain, and secure its services, systems, and networks, including preventing or responding to cybersecurity incidents; and
- protect OneSpan's legal rights or property, including the enforcement of contractual terms.

OneSpan may share data with third parties where such data has been anonymised, pseudonymised, or aggregated so that it does not identify individual Data Subjects. This may include:

- anonymised or pseudonymous usage data shared with service providers and sub-processors for analytics, service improvement, and security purposes; and
- aggregated statistical data shared publicly to illustrate general trends in the use of OneSpan's Sites or services.

Personal Data may be disclosed or transferred to third parties in the context of corporate or organizational changes, including a reorganization, merger, sale, joint venture, assignment, transfer of activities or assets, or insolvency or similar proceedings.

Some OneSpan services may include links to third-party services or platforms that operate under their own data protection practices. If you choose to provide Personal Data to such third parties, their privacy notices will govern the processing of your data. In the event of a conflict between a OneSpan data protection Notice and the terms of a separate agreement between you and OneSpan, the terms of that agreement shall prevail.

## 6. How long do we keep your personal data?

OneSpan retains Personal Data only for as long as necessary to fulfil the purposes for which it was collected and processed. Retention periods are determined by reference to the nature of the data, the purposes of processing, and applicable legal and regulatory requirements, including statutory retention obligations and limitation periods. Once the applicable retention period has expired, Personal Data is securely deleted or anonymized. Where complete deletion is not technically feasible, OneSpan applies appropriate technical and organizational measures to restrict access to, and further processing of, such data in accordance with Applicable Data Protection Laws. Unless a longer retention period is required by law, website monitoring and security-related log data are generally retained for up to one year.

## 7. User profiles, preferences, and opt-out options

Certain areas of the Sites, downloadable materials, or OneSpan programs may require you to create a user account and maintain a user profile. Through your account or the Preference Center, you can manage your communication preferences and decide whether to opt in or out of marketing communications and specific programs. Where you have provided consent, OneSpan may use your Personal Data to send you information about its products and services, events, webinars, and related offerings via electronic or other legally permitted communication channels. You may withdraw your consent at any time by using the unsubscribe or opt-out mechanisms included in OneSpan communications, by adjusting your preferences in the Preference Center, or by contacting OneSpan at [privacy@onespan.com](mailto:privacy@onespan.com). Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal and may limit access to certain Sites or services. Some OneSpan Sites require separate registrations, while others may enable single sign-on functionality across multiple Sites.

## 8. Participation in Portals

OneSpan provides access to certain Portals, such as partner, customer, or community Portals, which allow registered users to post content, respond to messages, and interact with other users.

When you choose to publish content or Personal Data in a Portal, you do so at your own discretion and remain solely responsible for the information you make available. Depending on your account settings, any Personal Data you voluntarily disclose may be accessible to other users of the Portal and, in some cases, may become publicly available on the internet. OneSpan does not control how other users may further use or process information that you choose to share.

By posting content or Personal Data in a Portal, you represent and warrant that you have the right to do so. You grant OneSpan a non-exclusive, worldwide, royalty-free license to host, display, transmit, copy, distribute, and otherwise technically process such content for the purpose of operating and managing the Portal.

OneSpan reserves the right to remove, in whole or in part, content that is unlawful, inappropriate, or inconsistent with applicable rules of use, and to suspend or terminate a user's access to the Portals where necessary to protect other users, OneSpan, or the integrity of the platform.

## 9. Chatbot interactions

The Chatbot is designed to provide general information, respond to questions, and offer assistance regarding OneSpan and its products or services. When using the Chatbot, you may choose to identify yourself and submit Personal Data, such as your name or contact details, although this is not mandatory.

When you submit information via a Chatbot, OneSpan processes the content of your interaction (including questions, comments, and inputs), together with certain technical data such as your IP address and device or browser information. This processing is carried out for the purpose of providing information, assistance, and responses through an efficient and accessible communication channel. The legal basis for this processing is OneSpan's legitimate interest in offering modern customer interaction tools.

You are strongly discouraged from submitting Personal Data relating to third parties through a Chatbot. Chatbots are not intended for the submission of sensitive categories of Personal Data, and any such data should not be provided. Where third-party or sensitive data is submitted inadvertently, OneSpan may delete it in accordance with applicable law.

In addition to information that directly identifies you, a Chatbot may collect technical, usage, or statistical information that does not directly identify an individual, such as browser or device data, interaction metrics, or aggregated usage statistics. Such information may be derived from Personal Data but is used in an aggregated or anonymized manner where possible.

Data collected via Chatbots may be used for the following purposes:

- communicating with you via the Chatbot;
- providing information and answers to common questions;
- responding to requests for assistance related to OneSpan products or services;
- maintaining and improving customer interaction and support processes; and
- subject to applicable law, enriching OneSpan's customer and marketing management systems with professional contact information relating to the organization you represent.

Where permitted by law, Personal Data collected via the Chatbot may also be used for limited follow-up activities, such as prospecting communications, marketing development, or internal business analytics, provided that such use is compatible with the original purpose of collection and does not involve automated decision-making or profiling with legal or similarly significant effects.

The Chatbot functionality is provided using a third-party service provider that processes data in the United States. Further

information on this provider's data processing practices is available [on](#) the Privacy Center.

Personal Data collected via the Chatbot is retained only for as long as necessary to fulfil the purposes for which it was collected, in particular while the organization you represent remains an interested prospect or an existing customer.

## **10. Cookies and Similar Technologies**

The Sites use cookies and similar technologies to enable functionality, analyze usage, personalize content, and support marketing activities. These technologies may collect identifiers and technical data such as IP addresses, navigation data, user preferences, and account-related information. You can manage cookie preferences through your browser settings or relevant opt-out tools. Disabling certain cookies or similar technologies may affect the availability or functionality of parts of the Sites. More detailed information is available in OneSpan's Cookie Statement. OneSpan may also use remarketing tags, web beacons, and similar technologies to analyze Site usage and reach previous visitors with relevant communications, subject to Applicable Data Protection Laws. The introduction of new passive tracking technologies will be carried out in accordance with applicable legal requirements.

## **11. Artificial Intelligence (AI) Systems and Data Processing**

OneSpan may use artificial intelligence-based systems, including machine learning-enabled tools, to support and enhance certain internal business operations, product functionalities, security, analytics, customer interactions, and service improvements. Where such systems are used, OneSpan is responsible processing Personal Data in compliance with Applicable Data Protection Laws and applicable artificial intelligence regulations.

OneSpan designs, deploys, and operates AI systems in accordance with a risk-based governance approach aligned with the EU Artificial Intelligence Act (AI Act) and comparable international AI laws and standards. This includes, where applicable:

- classification of AI systems according to their intended purpose and risk profile;
- implementation of appropriate governance, documentation, and oversight measures;
- human oversight proportional to the risk and impact of the AI system; and
- measures to ensure accuracy, robustness, cybersecurity, and traceability.

OneSpan does not intentionally deploy AI systems for prohibited practices under applicable AI laws, including systems that exploit vulnerabilities of individuals or that involve unlawful profiling or social scoring.

Where AI systems process Personal Data, such processing is limited to what is necessary for the specified and legitimate purpose of the AI system and is subject to data protection principles, including lawfulness, fairness, transparency, data minimization, purpose limitation, accuracy, and storage limitation.

Personal Data used in connection with AI systems may include data provided directly by Data Subjects, data generated through interactions with OneSpan systems, or data derived from lawful sources, as further described in the relevant privacy notices and annexes. Where feasible and appropriate, OneSpan applies techniques such as pseudonymization, anonymization, aggregation, or data masking to reduce privacy risks.

Personal Data is not used to train or further develop AI systems unless there is a valid legal basis under Applicable Data Protection Laws and such use is compatible with the original purpose of collection. Where AI models are trained or tested using data sets that include Personal Data, OneSpan applies safeguards to prevent unintended memorization, re-identification, or misuse of Personal Data.

Unless explicitly stated otherwise in a product-specific notice or agreement, OneSpan does not use customer content or confidential business data to train general-purpose AI models.

OneSpan does not use AI systems to make decisions producing legal effects concerning Data Subjects or similarly significantly affecting them, unless such processing is permitted by Applicable Data Protection Laws and appropriate safeguards are in place, including the right to obtain human intervention, to express one's point of view, and to contest the decision.

Where required by law, OneSpan provides meaningful information about the use of AI systems that materially interact with Data Subjects, including the role of automation, the nature of the processing, and available rights.

Where OneSpan relies on third-party AI service providers or components, OneSpan conducts appropriate due diligence and maintains contractual safeguards to address data protection, confidentiality, security, and compliance with applicable AI regulations, including international transfer requirements where relevant.

OneSpan monitors developments in AI regulations and standards globally and updates its AI governance, controls, and documentation as necessary to maintain compliance with evolving legal and regulatory requirements.

**12. Your rights as a data subject**

Under Applicable Data Protection Laws, you have specific rights regarding the Personal Data that OneSpan processes about you. The overview below outlines those potential rights, explains what they mean in practice, and describes any applicable limitations.

Right	What This Means in Practice	When It Applies / Limitations
<b>Right of Access</b>	You may ask OneSpan to confirm whether we process your Personal Data and, if so, to provide you with a copy of that data together with information on how and why it is used, the categories of data concerned, recipients or categories of recipients, the envisaged retention period, and information about your rights.	Applies to all processing. Access may be limited where disclosure would adversely affect the rights and freedoms of others, or conflict with legal obligations (e.g., legal privilege, trade secrets).
<b>Right to Rectification</b>	You may request that inaccurate Personal Data be corrected without undue delay, or that incomplete Personal Data be completed, including by means of providing a supplementary notice.	Applies where the data held is factually inaccurate or incomplete. OneSpan will inform recipients to whom data was disclosed, unless impossible or disproportionate effort.
<b>Right to Erasure ("Right to be Forgotten")</b>	You may request that OneSpan delete your Personal Data without undue delay, for example where it is no longer necessary for the purposes for which it was collected, you withdraw consent, you object to processing, or the data was unlawfully processed.	Does not apply where OneSpan must retain data to: (a) comply with a legal obligation; (b) perform a contract; (c) exercise freedom of expression/information; (d) public health purposes; (e) archiving in public interest, scientific/historical research, statistics; (f) establish, exercise, or defend legal claims.
<b>Right to Restriction of Processing</b>	You may ask OneSpan to temporarily limit the use of your Personal Data, for example while a request for correction is being assessed, where you contest accuracy, where processing is unlawful but you oppose erasure, or where you need data for legal claims.	During restriction, data may generally only be stored and not actively processed, except: (a) with your consent; (b) for legal claims; (c) to protect another person's rights; (d) important public interest. OneSpan will inform you before lifting restriction.
<b>Right to Data Portability</b>	You may request to receive the Personal Data you have provided to OneSpan in a structured, commonly used, and machine-readable format (e.g., CSV, JSON), and to transmit that data to another controller without hindrance, or request direct transmission where technically feasible.	Applies only where: (a) processing is based on consent or contract; AND (b) processing is carried out by automated means. Does not apply to data derived or inferred by OneSpan. Must not adversely affect rights of others.
<b>Right to Object</b>	You may object to the processing of your Personal Data based on OneSpan's legitimate interests (including profiling), or where processing is for a task in the public interest. For direct marketing, you may object at any time and OneSpan must cease processing for that purpose.	For legitimate interest processing: OneSpan may continue if it demonstrates compelling legitimate grounds that override your interests, rights and freedoms, or where required for legal claims. For direct marketing: objection is absolute with no grounds required.
<b>Right to Withdraw Consent</b>	Where processing is based on your consent, you may withdraw that consent at any time. It shall be as easy to withdraw as to give consent. Upon	Withdrawal does not affect the lawfulness of processing carried out before the consent was withdrawn. OneSpan is not required to

Right	What This Means in Practice	When It Applies / Limitations
	withdrawal, OneSpan will cease the relevant processing activities.	reverse processing already completed. Some services may no longer be available after withdrawal.
<b>Rights Related to Automated Decision-Making</b>	You have the right not to be subject to a decision based solely on automated processing, including profiling, that produces legal effects concerning you or similarly significantly affects you. You have the right to obtain human intervention, express your point of view, and contest the decision.	Applies only where such automated decision-making: (a) is used; AND (b) produces legal or similarly significant effects. Does not apply where decision is: (a) necessary for contract; (b) authorized by law; (c) based on explicit consent - but in these cases, safeguards including human intervention must be available.
<b>Right to Lodge a Complaint</b>	You have the right to lodge a complaint with the competent supervisory authority (Data Protection Authority) in your country of residence, place of work, or place of alleged infringement if you believe your Personal Data has been processed unlawfully or in violation of your rights.	This right applies at any time and does not prevent you from seeking other administrative or judicial remedies. You also have the right to an effective judicial remedy against a controller or processor.
<b>Right to Notification of Rectification, Erasure, or Restriction</b>	OneSpan will communicate any rectification, erasure, or restriction of processing to each recipient to whom Personal Data has been disclosed, and will inform you about those recipients upon request.	Unless this proves impossible or involves disproportionate effort.

### 13. Contacting OneSpan and supervisory authorities

OneSpan is committed to handling Personal Data in a careful, transparent, and lawful manner in accordance with Applicable Data Protection Laws. If you wish to exercise any of your data protection rights, or if you have questions, concerns, or requests regarding OneSpan's processing of Personal Data, you are encouraged to contact OneSpan in the first instance.

You may contact OneSpan regarding privacy matters by email at [privacy@onespan.com](mailto:privacy@onespan.com). This contact point is available for Data Subject requests, privacy-related questions, and general communications concerning the protection of Personal Data. To enable OneSpan to process your request efficiently and securely, please clearly indicate which right or rights you wish to exercise, provide sufficient information to allow us to verify your identity, specify the Personal Data concerned where relevant, and indicate your preferred format for receiving a response, where applicable.

If you are not satisfied with OneSpan's response, or if you believe that your Personal Data has been processed unlawfully, you have the right to lodge a complaint with a competent supervisory authority. Within the EU/EEA, this may include the supervisory authority in your Member State of habitual residence, your place of work, or the place where the alleged infringement occurred. As OneSpan's main establishment in the EU is located in Belgium, the Belgian Data Protection Authority may act as lead supervisory authority:

Belgian Data Protection Authority  
Drukpersstraat 35, 1000 Brussels, Belgium  
Telephone: +32 2 274 48 00  
Email: [contact@apd-gba.be](mailto:contact@apd-gba.be)

Depending on the circumstances, another supervisory authority in the EU/EEA may be competent where the matter relates exclusively to a OneSpan entity established in that Member State or substantially affects Data Subjects in that jurisdiction. A list of EU/EEA supervisory authorities is available on the website of the European Data Protection Board.

### 14. Technical and organizational measures

OneSpan implements appropriate technical and organizational measures to process Personal Data securely and in accordance

with this Notice and Applicable Data Protection Laws. These measures are designed to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. The Sites use industry-standard encryption technologies, including Transport Layer Security (TLS). OneSpan also takes steps to reduce risks arising from human error, misuse, fraud, or unauthorized access, including through staff training, internal policies, and confidentiality obligations. Security incidents and suspected unauthorized processing are promptly assessed and addressed. Where required by law, OneSpan will notify affected individuals and competent authorities of Personal Data breaches within the applicable legal timeframes. OneSpan cannot be held responsible for the unlawful or improper use of Personal Data by third parties acting outside OneSpan’s control.

## 15. Annex I-Personal Data Processing Overview

### DATA SUBJECT CATEGORIES

OneSpan processes Personal Data from the following categories of individuals:

Category	Description
Customers	Prospective/potential customers, existing customers and clients, their staff, employees, appointees, and other useful contacts within the framework of OneSpan's services and activities.
Suppliers, Contractors & Business Partners	Suppliers, outsourcing partners, service providers, advisors, brokers, agents, consultants, contractors, subcontractors, and certain of their staff, employees, appointees, and other useful contact persons.
Personnel	OneSpan employees - processing regulated by internal Employee Data Protection Notice due to its specific nature.
Job Candidates	Individuals who apply for jobs at OneSpan, including via temporary work agencies or recruitment agencies - regulated by Talent Acquisition Data Protection Notice.
Other Persons	Useful contacts within the sector, network contacts, contacts with government agencies, regulators, expert contacts, and others.

### PERSONAL DATA CATEGORIES PROCESSED

#### Persons Interacting with OneSpan (Email, Phone, Webinars, Events, In-Person)

Personal Data Categories
<ul style="list-style-type: none"> <li>Name, salutation</li> <li>Professional information (business title, occupation)</li> <li>Contact details (telephone, mobile, fax, email, postal address)</li> <li>Username, password</li> <li>Photograph and/or biographical information</li> <li>Social media profile</li> <li>Areas of expertise</li> <li>Consent to processing for agreed purposes (if applicable)</li> <li>Consent to marketing permissions and use of cookies/data collection techniques</li> </ul>

**Collected when:** (i) communicating in person, electronically, by telephone, or in writing with OneSpan; (ii) applying/registering for training, certification, events, webinars, or contests; (iii) subscribing to newsletters or downloading Site content; (iv) registering for online communities.

#### Website Users (Including Portal Users)

Personal Data Categories
<ul style="list-style-type: none"> <li>Device and usage information</li> <li>Portal registration and usage information (customer portal, community portal, developer portal, partner portal, support portal)</li> </ul>

### Personal Data Categories

- Unique IDs (cookie ID, device identifiers)
- Geolocation data
- Browser information (IP address, browser type and language, access times)
- Referring and exit URLs
- Site activity data (navigation patterns, visit frequency, length of stay)
- Data from Cookie Technologies
- Data from security monitoring or SSL decryption (name, email, phone, date of birth, or any submitted data)

### Demonstration/Trial Participants

#### Personal Data Categories

- Biometric data (if elected to submit for demonstration, testing, or proof of concept)
- Other Personal Data submitted for agreed demonstration purposes

**Note:** Refer to Global Biometric Data Protection Notice for detailed information.

### Representatives of Customers

#### Personal Data Categories

- First name, last name
- Professional contact information (employer, job title, email address, telephone number)
- Employment information (employer, function title, address)
- Involvement in incidents, complaints, and problems in contract/payment execution (including content)
- All other information shared during business interactions

### Representatives of Suppliers, Contractors & Business Partners

#### Personal Data Categories

- First name, last name
- Professional contact information (employer, job title, email address, telephone number)
- For individual suppliers/contractors/partners: bank account number, bank name, account holder name, transaction/transfer details, billing information
- All other information shared for contract execution and financial/accounting/legal obligations

### OneSpan Personnel

#### Personal Data Categories

- All information required and permitted under applicable law for employment relationship
- Legal obligations towards employees
- Salary/employee benefits payment
- Related administration and financial matters

### Job Candidates

### Personal Data Categories

- First name, last name
- Professional contact information (employer, job title, email address, telephone number)
- Education and employment history
- Job preferences
- Professional qualifications
- Jobs you wish to apply for
- Résumé or curriculum vitae
- Diploma
- Employment references and related information
- Compensation expectations or requests
- Background check and screening results (if required for function)
- Areas of interest or message topic
- Language preferences
- All other information shared during application process and interviews

**Note:** Refer to Talent Acquisition Data Protection Notice for detailed information.

### Other Persons

#### Personal Data Categories

- First name, last name
- Professional contact information (employer, job title, email address, telephone number)
- All other information shared for contract execution (if any) and legal/financial/regulatory obligations

## HOW ONESPAN COLLECTS PERSONAL DATA

### Data Collection Methods

**Active Data Processing:** Data requested directly from the Data Subject, who must actively provide it.

**Passive Data Processing:** Data collected without asking the Data Subject (e.g., cookies collecting information about site visitors without active input). May also include receiving, storing, or passing on data without analysis, modification, or operation.

Collection Method	Details
Direct Communication	Verbal or written communication to OneSpan
Website Visits	Visiting OneSpan Sites
Portal Accounts	Creating accounts in OneSpan Portals and using functions/services directly or indirectly
Events & Campaigns	Participating in webinars, events, commercial promotions, or marketing campaigns
Research & Surveys	Participating in market research, surveys, or other evaluation actions
Web Forms	Contacting OneSpan via webforms
Electronic Communication	Contacting via email, chatbot, social media, or telephone
Demonstrations & Trials	Participating in demonstrations, trials, or specific projects
Public Sources	Public channels and professional social media (e.g., LinkedIn)
Third Parties	Partners and third parties who can demonstrate consent was given to transfer data to OneSpan
Telephone Recordings	Calls may be recorded for educational, quality, and security reasons. Limited

Collection Method	Details
Passive Collection	employee access. Auto-deleted after 60 days. Browser/device info, automated electronic interactions, app usage data, demographic info, geographic/geo-location info, statistical and aggregated information (derived from Personal Data but not directly identifying)

## PURPOSE OF PROCESSING

### Website Users and Visitors

Processing Purpose	Legal Basis
Allow access to downloadable materials and third-party resources	Legitimate interest
Allow access and use of Sites, including Portals	Contract execution / Legitimate interest
Verify user compliance with OneSpan Terms of Use	Contract execution
Monitor use of Site, apps, and tools in systems	Legitimate interest
Enhance security and protect from fraud or inappropriate conduct	Legitimate interest
SSL decryption of corporate firewalls to visualize/analyze encrypted traffic and screen for malicious data (viruses, spyware, malware) - monitoring purposes only	Legitimate interest (security)
Other functions as disclosed at point of collection or required/permitted by law	Various (as applicable)

### Customers

Processing Purpose	Legal Basis
Agreement execution, customer management, contract and account management	Contract execution
Provide products, services, updates/patching, maintenance, support, troubleshooting, reporting, logging, technical support	Contract execution
Customer support (replying to requests/inquiries, offering assistance, handling complaints)	Contract execution
Send contract-related messages and service notifications	Contract execution
Send analysis or reports as agreed in contract	Contract execution
Accounting operations	Contract execution / Legal obligation
Prospecting and direct marketing (surveys, promotional/commercial information)	Consent (where mandatory) / Legitimate interest
Data analysis for product, service, data protection, or information security enhancement	Legitimate interest
Develop aggregate analysis and business intelligence for informed decisions and business performance reporting	Legitimate interest
Improve user experience by analyzing user behavior and potential problems	Legitimate interest
Test, improve, and develop products and services	Legitimate interest
Service development, quality improvement, coaching and training of personnel (calls may be recorded)	Legitimate interest
Evaluate customer satisfaction and identify wishes via experience surveys	Legitimate interest (voluntary participation)
Market research and trend analysis involving customers	Legitimate interest (voluntary participation)
Detect and prevent internal or external fraud and criminal activities	Legitimate interest / Legal obligation
Profiling based on anonymized data for business analytics and reporting (no automatic decision-making)	Legitimate interest
Internal analytics and transaction reporting	Contract execution / Legitimate interest
Collect, verify, and store identification and transaction data; transfer to authorities upon official request	Legal obligation
Financial, accounting, and administrative compliance	Legal obligation

### Communications (All Data Subjects)

Processing Purpose	Legal Basis
Respond to requests or perform required activities	Contract execution / Legitimate interest

Processing Purpose	Legal Basis
Communicate news and updates on products and services	Consent / Legitimate interest
Enhance business programs and relevance of marketing activities	Legitimate interest
Send notifications on current and new products/services, news updates, programs, events	Consent / Legitimate interest
Respond to inquiries, send administrative data and service notifications	Contract execution / Legitimate interest
Allow participation in surveys, community discussions, blogs, chat forums, message boards	Consent / Legitimate interest
Tailor content, improve Site quality and user experience, notify of Site changes/updates	Legitimate interest
Tailor marketing to users' and subscribers' needs	Consent / Legitimate interest
Remarket and advertise to previous Site users	Consent / Legitimate interest
Customize, measure, and enhance effectiveness of promotional events and communications	Legitimate interest
Track marketing campaign results and responses	Legitimate interest
Link/combine information with third-party data for better, personalized products	Contract execution / Legitimate interest
Event attendance: scan attendee badge (with consent) to collect name, title, company, address, country, phone, email	Consent
Deliver personalized communications via email, SMS, or social media	Consent / Legitimate interest
Send promotional offers, surveys, industry events, promotions information	Consent / Legitimate interest
Disclose/transfer Personal Data to third party in merger, acquisition, or similar activities	Legitimate interest / Legal obligation

### Suppliers, Contractors & Business Partners

Processing Purpose	Legal Basis
Agreement execution and management of contractual relationship	Contract execution
Receive supplies, services, or works and manage contract execution	Contract execution
Administration	Contract execution / Legitimate interest
Assessments/audits	Contract execution / Legitimate interest
Payment execution	Contract execution
Financial and accounting matters	Contract execution / Legal obligation
Communications regarding contract execution, purchasing, tenders, assignments	Contract execution
Handling complaints, providing instructions, invoicing	Contract execution
Direct marketing	Legitimate interest
Financial, accounting, and administrative compliance	Legal obligation

### Personnel Management & Recruitment

Processing Purpose	Legal Basis
Personnel management	Contract execution / Legal obligation
Payroll administration	Contract execution / Legal obligation
Payment of salaries and benefits	Contract execution / Legal obligation
Compliance with employer legal obligations	Legal obligation
Process online applications for job vacancies and spontaneous applications	Consent / Pre-contractual measures
Communicate with candidates	Pre-contractual measures / Legitimate interest
Manage recruiting and hiring processes	Legitimate interest
Compliance with legal and regulatory requirements	Legal obligation
If hired: employment and personnel management, hiring analytics	Contract execution / Legitimate interest

### LEGAL BASES FOR PROCESSING

Where Applicable Data Protection Laws require a legal basis, OneSpan processes Personal Data on one or more of the following grounds:

Legal Basis	When Applied
Explicit Consent	Job applications; user account creation; newsletter subscription; webcast/forum/information access; visiting branded social media pages; using/accessing OneSpan services; marketing communications (where mandatory)
Contract Execution	Creating or fulfilling contractual obligations with you or the entity you represent; billing; reporting; service delivery; legitimate business purposes
Legal Obligation	Health and safety; taxation; anti-money laundering laws; anti-corruption laws; where required by law for a particular purpose; transfer to competent authorities upon official request
Vital Interests	Protecting vital interests of data subject or another person
Legitimate Interest	Adequate communication and responding to requests; analyzing, developing, improving and optimizing Sites, products and services; maintaining security of Sites, networks and systems; provision of products by OneSpan and service providers/sub-processors; marketing (where consent not required); processing data from public sources or third parties where genuine and legitimate reason exists (unless outweighed by harm to data subject rights)

## 16. Annex 2-Data Sharing Overview

### LEGAL BASES FOR DATA SHARING (GDPR)

Legal Basis	Condition for Transfer
Art. 6(1)(a) - Consent	Explicit consent given for one or more specific purposes
Art. 6(1)(b) - Contract	Permitted by law and necessary for fulfillment of contractual obligations
Art. 6(1)(c) - Legal Obligation	A legal obligation for disclosure exists
Art. 6(1)(f) - Legitimate Interest	Necessary for assertion, exercise, or defense of legal claims; no overriding interest in non-disclosure

### INTRAGROUP DATA SHARING

Aspect	Details	Safeguards
OneSpan Group Companies	Listed at Privacy Center (onespan.com/privacy-center)	Intragroup Data Processing Agreements
International Transfers	May transfer outside home country/EEA to countries with different protection levels	EU Standard Contractual Clauses (SCCs)
Purposes	Reporting, service delivery, business operations, direct marketing, communications	Contractual arrangements with affiliates and sub-processors

### CATEGORIES OF EXTERNAL RECIPIENTS

Recipient Category	Examples / Description
IT & Technology Providers	IT services companies, hosting partners, IT suppliers, platform providers
Cloud & Infrastructure	Cloud and hosting infrastructure services providers
Marketing & Analytics	Marketing companies, market analysts, event organizers, email campaign providers
Compliance Services	Providers of services and tools to assure regulatory compliance
Connectivity Providers	Telecommunication and internet providers
Customer Service	Companies providing customer service assistance
Security Services	Companies protecting and securing systems and services
Managed Service Providers	Third-party providers performing business functions on behalf of OneSpan (data analytics, infrastructure, auditing)
Professional Advisers	Lawyers, bankers, auditors, insurers, accountants, DPOs (as processors or joint controllers)
Government & Authorities	Criminal, fiscal, regulatory authorities; auditing authorities; public authorities for national security/law enforcement

### CUSTOMER DATA SHARING

Sharing Scenario	Legal Basis	Notice Required
Legal obligation (regulatory/government bodies, court orders, legal proceedings)	Legal obligation	Where legally permitted
With consent or to complete requested transaction/service	Consent / Contract	N/A (consent obtained)
Among OneSpan affiliates (reporting, service delivery, operations, marketing)	Legitimate interest	Privacy Notice
With suppliers, partners, processors, agents for stated purposes	Contract / Leg. interest	Privacy Notice
Reorganization, merger, sale, joint venture, bankruptcy	Legitimate interest	Reasonable efforts to notify
Subpoenas, legal process, rights protection, fraud investigation, government requests	Legal obligation / Leg. interest	Notify first where not prohibited
Anonymous/pseudonymous usage data for analysis	Legitimate interest	N/A (de-identified)
Aggregated data for public trend reporting	Legitimate interest	N/A (aggregated)
Marketing purposes with event organizers and marketing providers	Consent / Leg. interest	Privacy Notice

### SUPPLIER, CONTRACTOR & BUSINESS PARTNER DATA SHARING

Purpose	Legal Basis
Comply with applicable law (financial, accounting, administrative compliance)	Legal obligation
Respond to valid legal process from law enforcement or government agencies	Legal obligation
Organize/facilitate collaborations between suppliers, partners, subcontractors, and interfacing third parties	Legitimate interest
Protect the rights or property of OneSpan	Legitimate interest

### PROTECTIVE ACCESS, TRANSFER & DISCLOSURE

OneSpan will access, transfer, disclose, and preserve Personal Data when necessary to:

Purpose	Details
Legal Compliance	Comply with applicable law (financial, accounting, administrative) or respond to valid legal process
Customer Protection	Prevent spam, fraud, loss of life, or serious injury
Service Security	Prevent/stop attacks on computer systems or networks
Rights & Property Protection	Enforce terms of service; refer IP theft matters to law enforcement (no inspection of private customer content)

### DE-IDENTIFIED & AGGREGATED DATA SHARING

Data Type	Recipients	Purpose
Anonymous/Pseudonymous Usage Data	Third parties, sub-processors, service providers	Analysis and improvements
Aggregated Usage Data	Public (general business operations)	Show trends about general Site use
De-identified Data	Third parties	Cannot be used to identify individuals or end users

### SAFEGUARDS SUMMARY

Safeguard	Description
Confidentiality Obligations	Employees, contractors, and service providers must agree to confidentiality and data privacy obligations
Purpose Limitation	Recipients may only use Personal Data for the specific purpose for which it was provided
Data Protection Requirements	Third parties must abide by OneSpan's data protection and security requirements
No Unauthorized Use	Recipients are not allowed to use Personal Data for any other purpose
International Transfer Safeguards	Standard Contractual Clauses (SCCs) and other contractual arrangements for cross-border transfers

Safeguard	Description
Advance Notice	Reasonable efforts to inform data subjects in advance of transfers to third parties (where technically/commercially feasible and legally permitted)

**BUSINESS REORGANIZATION & TRANSFER SCENARIOS**

Scenario	Data Subject Notification
Business reorganization (all or part)	Reasonable efforts to inform in advance
Transfer of activities	Reasonable efforts to inform in advance
Bankruptcy declaration	Reasonable efforts to inform in advance
Court order or legal obligation	May not be feasible due to legal restrictions
Merger, sale, joint venture, assignment, disposition of business/assets/stock	Reasonable efforts to inform in advance