

Data Protection Officer GDPR and NIS2 Representative

I. DATA PROTECTION COMPLIANCE

OneSpan has designated a Data Protection Officer at group level as per the requirements of the 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) (https://eur-lex.europa.eu/eli/reg/2016/679/oj).

For Data Subjects located in the EU or for any questions about our data protection program or cookie statement, written data subject request or inquiries to the OneSpan EU Data Protection Officer or the GDPR Representative maybe emailed to <u>privacy@onespan.com</u> or addressed to:

I.I. DATA PROTECTION OFFICER

Stéphanie Heyman

Tel. +32 471 11 75 26

Address:

OneSpan NV De Kleetlaan 12 box A 1831 Machelen

Belgium

1.2. GDPR REPRESENTATIVE

OneSpan NV

De Kleetlaan 12 box A 1831 Machelen Belgium

1.3. REPRESENTATIVE FOR NON-EU COMPANIES IN THE EUROPEAN UNION (EU)

For the OneSpan entities subject to article 27 of the GDPR, OneSpan NV is to be considered the GDPR Representative for non-EU based OneSpan entities in the EEA, including its United Kingdom group companies.

1.4. REPRESENTATIVE IN THE UNITED KINGDOM (UK)

For the OneSpan entities subject to the United Kingdom GDPR/Data Protection Act which do not have an office in the United Kingdom but do conduct activities in the United Kingdom market, OneSpan NV is to be considered the GDPR Representative for non-UK based OneSpan entities.

1.5. REPRESENTATIVE IN SWITZERLAND

The Data Protection Officer was also registered at the "Eidgenössischer Datenschutz- und Öffentlichkeitsbeautragter (EDÖB)" for the following entities: OneSpan International GmbH and OneSpan Solutions GmbH

1.6. Data Protection Officer for other jurisdictions

The Data Protection Officer (DPO) for Canada and any other jurisdiction requiring the appointment of a DPO or similar function may be reached at the e-mail address and postal address indicated in section 1 above.

2. NIS2 COMPLIANCE AND REPRESENTATION

In accordance with Article 26.2 of the Directive (EU) 2022/2555 of the European Parliament and of the Council of 14 December 2022 on measures for a high common level of cybersecurity across the Union, amending Regulation (EU) No 910/2014 and Directive (EU) 2018/1972, and repealing Directive (EU) 2016/1148 (NIS 2 Directive) ("NIS2") (https://eur-lex.europa.eu/eli/dir/2022/2555), OneSpan NV, established in Belgium, is identified as the main establishment within the European Union where decisions regarding cybersecurity risk management measures are predominantly made.

As such, OneSpan adheres to Belgian law for matters related to cybersecurity within the EU.

For our entities outside the EU, including those in Switzerland, the UK, and the US, OneSpan NV (Belgium) has been designated as the representative as per Article 26.3 of NIS2.

This designation ensures compliance with NIS2 for services offered within the Union, placing OneSpan under the jurisdiction of Belgian law.