OneSpan Product Data Protection Notice

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1. 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, users, end users, and other individuals whose Personal Data may be processed in connection with the use of OneSpan products.

This Product Data Protection Notice applies to OneSpan products and services and in particular describes how Personal Data is processed in connection with the provision and use of OneSpan's Products and Services) In particular, this Notice explains how OneSpan collects, uses, stores, transfers, and otherwise processes Personal Data of Users, End Users, project contacts, and other individuals whose Personal Data is handled in connection with the Products and Services.

This Notice does not describe OneSpan's data protection practices in relation to activities that are not connected to the Products and Services, such as corporate websites, marketing activities, recruitment, or other business operations where OneSpan acts as a controller independently of a customer relationship. Information on those processing activities is available in the OneSpan Corporate Data Protection Notice, accessible via the Privacy Center.

Customers, Users and End Users are not legally obliged to provide Personal Data to OneSpan. However, the provision and processing of Personal Data is necessary for OneSpan to deliver the Products and Services. Without such processing, OneSpan may be unable to provide access to, or ensure the proper functioning of, the Products and Services. Customers and Users remain responsible for the accuracy and completeness of the Personal Data they provide and are requested to inform OneSpan promptly of any changes.

Although the scope and application of data protection laws may vary depending on jurisdiction, this Notice applies to the extent permitted under the Applicable Data Protection Laws. OneSpan operates globally through affiliated entities; however, each Customer's contractual relationship exists with the OneSpan entity identified in the applicable customer agreement.

This Notice is reviewed and updated periodically to reflect changes in legal requirements, regulatory guidance, or OneSpan's products and services, including the introduction of new features, functionalities, or processing activities. The most recent version is always available via the OneSpan Privacy Center. Where legally required or otherwise appropriate, material changes will be communicated through the Products and Services, the Privacy Center, or other reasonable means.

2. What is in scope for this notice

This Notice applies to the processing of Personal Data in connection with:

1. The administration of the contractual relationship between OneSpan and the Customer, in respect of which OneSpan acts as an independent controller. This includes, without limitation: (i) onboarding, account set-up and user provisioning; (ii) invoicing, billing management and payment processing; (iii) contract lifecycle management, including renewals, amendments and terminations; (iv) service-level communications, including scheduled maintenance notices, product updates and security advisories; (v) license and entitlement management; and (vi) customer relationship management and escalation handling. Personal Data processed in this capacity is limited to what is strictly necessary for the administration of the contractual relationship and is not processed for any purpose incompatible with that relationship; and
   ;
2. The provision of the SaaS Services to Customers and their Users and End Users, where OneSpan acts as a processor on behalf of the Customer and processes Personal Data in accordance with the Customer's documented instructions; and
3. The delivery of Professional Services (including implementation, advisory, maintenance and long-term support engagements), Customer Support activities, and Distribution and Fulfilment services (including shipment of hardware authentication devices), in connection with which OneSpan may act as a controller or processor depending on the nature of the processing activity, as further described in this Notice.

Processing activities carried out by OneSpan as a controller entirely independently of any customer relationship—such as interactions with website visitors, online marketing, or recruitment activities—are governed by the OneSpan Corporate Data Protection Notice. Controller processing activities that arise directly in connection with the delivery of OneSpan products and services to Customers (including contract administration, Professional Services engagement management, and Customer Support operations) are covered by this Notice.

Where a Customer elects to participate in a product demonstration or trial, certain Personal Data may be shared with approved sub-processors as described in this Notice or in a demonstration-specific privacy notice made available prior to or in connection with the demonstration.

The Products and Services may contain links to third-party websites, services, or tools that are outside OneSpan's control. Such third-party services are governed by their own privacy practices, and OneSpan is not responsible for the content, security, or data protection practices of those third parties. Customers, Users, and End Users are encouraged to review the applicable third-party privacy notices before providing Personal Data.

Customers determine how and for what purposes Personal Data is collected, used, and retained in their use of the Products and Services. Customers may submit Personal Data of Users and End Users to OneSpan in the course of using the Products and Services and remain solely responsible for the accuracy, quality, and legality of that data, as well as for ensuring that they have an appropriate legal basis for its processing.

Customers agree not to process, transmit, or store within the Products and Services any Personal Data that is prohibited under applicable law or for which they do not have the required legal basis.

This Notice does not apply to applications, products, or services operated by Customers on or in connection with the Products and Services, to products or services sold by Customers, to electronic communications sent by Customers, or to any other Personal Data collected or processed directly by Customers through their use of the Products and Services. End Users should consult the relevant Customer's privacy notice for information on that Customer's data protection practices.

3. Definitions

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

Term	Definition
Applicable Data Protection Laws	Data protection and privacy laws that apply in a specific jurisdiction and/or to a particular type of data or processing activity, depending on the context of the processing.
Cookie Technologies	Passive data collection technologies such as cookies, web beacons, tags, pixels, and similar tools, as further described in OneSpan's Cookie Statement.
Customer	Any legal entity that enters into a contract with OneSpan. for access to or use of the Products and Services.
Data Protection Laws	Collectively: (i) applicable data protection and privacy laws of the United States of America (including state laws), (ii) the GDPR and the laws of non-EU EEA countries that have formally adopted the GDPR, (iii) Brazil's Lei Geral de Proteção de Dados Pessoais (LGPD), and (iv) any other data protection or privacy laws applicable to OneSpan's Processing of Personal Data.
Data Subject	Any identified or identifiable natural person whose Personal Data is processed in connection with the use of the OneSpan Products and Services. Depending on the context, Data Subjects may include Customer representatives, Users, and End Users.
End User	Any natural person who accesses or uses the Products and Services as an end user through or on behalf of a Customer, for example a customer or prospective customer of a financial institution that uses OneSpan Products and Services.
OneSpan, we, us, our	OneSpan Inc. and its affiliated entities worldwide.
Personal Data	Any information relating to an identified or identifiable natural person, as defined under Applicable Data Protection Laws. 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.
Privacy Center	The OneSpan website available at https://www.onespan.com/privacy-center, or any successor website serving the same purpose.
Processing / Processing of Personal Data	Any operation or set of operations performed on Personal Data, whether or not by automated means, as defined under Applicable Data Protection Laws.
Products and Services	Products and services, including SaaS Services, Professional Services, Customer Support, and Distribution and Fulfilment activities.
SaaS Services	Software and technology made available by OneSpan in a cloud-based model, together with related maintenance, support, or ancillary services, or any other product or service that links to this Product Data Protection Notice.
Notice	This Product Data Protection Notice.
User	Any natural person acting on behalf of a Customer who is authorized to access and use the Products and Services for that Customer, such as an employee, contractor, or agent of the Customer.

Abbreviation	Full Form	Abbreviation	Full Form
GDPR	General Data Protection Regulation	**EEA**	European Economic Area
DPA	Data Protection Authority	**EU**	European Union

4. 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, so that it can be investigated and addressed.

5. 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, including the list of sub-processors applicable to the Products and Services, all of which form an integral part of this Notice. You are encouraged to read this Notice carefully together with the Related Data Protection Documents made available in the Privacy Center, including the list of sub-processors and approved third-party logistics providers applicable to each of OneSpan's services and processing activities (Products and Services), all of which form an integral part of this Notice.

Document	Scope
Corporate Data Protection Notice	Personal Data processed by OneSpan as a controller for business functions
Global Biometric Data Protection Notice	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
Privacy Center	The OneSpan website available at https://www.onespan.com/privacy-center or any successor page serving the same purpose, containing privacy-related resources, notices, and information.
Cookie Statement	OneSpan's use of Cookie Technologies and available controls are described in detail in the Cookie Notice, accessible at www.onespan.com/cookie-statement
List of Regulatory Contacts and Representatives in the Privacy Center	Channels to contact OneSpan
Data Processing Addendum	The agreement entered into between OneSpan and its Customer that governs the processing of Personal Data, including the respective rights, obligations, and responsibilities of each party under applicable data protection laws.

6. Data Processing

For transparency and clarity, detailed information on the processing of Personal Data in connection with the Products and Services is set out in Annex 1 (Data processing overview). This annex describes, for each relevant category of Data Subject, the categories of Personal Data processed, the purposes of processing, the applicable legal bases, the sources of the data, applicable retention periods, and the safeguards applied.

7. Data Sharing and International Transfers

For transparency and clarity, detailed information on how and with whom Personal Data may be shared is set out in Annex 2 (Data sharing overview). Annex 2 identifies the relevant categories of recipients, describes the circumstances in which Personal Data may be disclosed or transferred—including international transfers—and explains the applicable transfer mechanisms and safeguards. Annex 2 forms an integral part of this Product Data Protection Notice and should be read together with it.

Personal Data processed by OneSpan in connection with its Products and Services,) is primarily handled internally and accessed only by authorized employees and personnel who require such access for legitimate business purposes. Where necessary to deliver, operate, secure, and support those services, Personal Data may be shared within the OneSpan group. All employees, contractors, sub-processors, logistics partners, and service providers are bound by confidentiality and data protection obligations designed to safeguard Personal Data and to limit its processing to documented instructions and applicable law.

Personal Data is shared only to the extent necessary to provide, operate, maintain, and secure the Products and Services, , to support customer-initiated transactions and workflows, to deliver and manage project and support engagements, to fulfil and ship hardware devices, to provide technical support and incident response, to comply with applicable legal, regulatory, accounting, or reporting obligations (including trade control and sanctions screening for Distribution activities), and to protect the security, integrity, availability, rights, property, or legitimate interests of OneSpan, its customers, Users, End Users, or other individuals. When Personal Data is disclosed for business purposes, OneSpan enters into appropriate contractual arrangements that define the purpose of the disclosure, require recipients to maintain confidentiality, and prohibit the use of Personal Data for any purpose other than performing the relevant contractual obligations. OneSpan does not sell, rent, or otherwise permit Personal Data to be used by third parties for their own direct marketing purposes.

Where required by law or justified by a legitimate business need, OneSpan may share limited professional information with suppliers, contractors, outsourcing partners, and business partners, strictly to the extent necessary to comply with applicable legal, financial, accounting, or administrative obligations; respond to valid legal processes or binding requests from courts, law enforcement authorities, or other public bodies; organize, manage, and facilitate contractual collaborations and operational interactions related to OneSpan's products and services, including Products and Services, or protect the rights, property, or legitimate interests of OneSpan.

OneSpan may also access, retain, transfer, or disclose Personal Data where required by law or valid legal process, or where it believes in good faith that such action is necessary to comply with legally binding requests from competent authorities; prevent, investigate, or respond to fraud, misuse, or security incidents; protect the safety of individuals, including against threats to life or physical integrity; operate, maintain, and secure its services, systems, and networks; or enforce contractual rights and defend legal claims. In this context, OneSpan does not proactively monitor or inspect private customer content for intellectual property infringements, but may refer matters to competent authorities where required by law.

Any such disclosure is limited to what is legally required and proportionate to the relevant purpose, and where legally permitted and applicable to a specific customer, OneSpan will notify the customer in advance and cooperate in responding to such requests.

OneSpan operates globally, and Personal Data may be processed or stored in countries outside the country or region in which it was originally collected, including outside the European Economic Area. Where Personal Data is transferred internationally, OneSpan applies appropriate safeguards in accordance with Applicable Data Protection Laws, which may include European Commission Standard Contractual Clauses or equivalent contractual mechanisms, adequacy decisions where available, and supplementary technical and organizational measures where required. Further information on international transfers and applicable safeguards is available in the Privacy Center and the applicable Data Processing Addendum.

Customer data submitted to the SaaS Services is stored on OneSpan-hosted servers or on infrastructure provided by approved third-party data centers, unless otherwise agreed in the applicable contract. Certain functionalities, such as SMS or telecommunications-related services, may involve routing data through telecom providers in different jurisdictions, depending on network efficiency and availability. Personal Data processed in connection with Distribution and Fulfilment activities is stored on infrastructure located within the European Union (for EU distribution) and within the United States (for US-based Customers). Where such processing involves international transfers, appropriate safeguards are applied in accordance with Applicable Data Protection Laws, including Standard Contractual Clauses where required.

OneSpan may also share data with third parties where such data has been anonymized, pseudonymized, or aggregated so that it no longer identifies individual Data Subjects. This may include anonymized or pseudonymous usage data shared with service providers or sub-processors for analytics, service improvement, product development, or security purposes, as well as aggregated statistical data shared publicly to illustrate general usage trends. Such data does not constitute Personal Data under Applicable Data Protection Laws, and OneSpan does not attempt to re-identify anonymized or de-identified data.

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

Finally, 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, the processing of that data will be governed by their respective privacy notices. In the event of any conflict between this Product Data Protection Notice and the terms of a separate agreement entered into with OneSpan, the terms of that agreement shall prevail.

8. How long do we keep your personal data?

OneSpan acting as a controller

Where OneSpan processes Personal Data in its capacity as a controller, Personal Data is retained only for as long as necessary to fulfil the purposes for which it was collected. Applicable retention periods are determined by reference to the nature of the processing and relevant legal and regulatory requirements, including statutory 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 use of such Personal Data, in accordance with Applicable Data Protection Laws.

Website monitoring and security-related log data processed by OneSpan as a controller are generally retained for up to one year, unless a longer retention period is required by applicable law. Personal Data processed as a controller in the context of Professional Services engagements (including project records and business contact information) and Customer Support operations (including case management records and operational logs) is retained for the duration of the relevant Customer relationship and for such additional period as may be required to comply with applicable legal, contractual, audit, or dispute resolution obligations, after which it is securely deleted or anonymized.

OneSpan acting as a processor

Where OneSpan processes Personal Data on behalf of a Customer in its capacity as a processor—including in connection with the SaaS Services

Unless otherwise instructed by the customer or required by applicable law, the following standard retention periods apply after termination or expiry of the customer contract:

- General SaaS Services: up to 90 days;
- OneSpan Sign: up to 60 days; and
- Identity Verification services: up to 60 days.
- Distribution and Fulfilment services: live shipment data for approximately 14 days; encrypted backup data for up to one year, after which it is automatically deleted in accordance with applicable backup lifecycle policies.

Following the expiry of the applicable retention period, Personal Data is securely deleted or returned in accordance with the customer's instructions and contractual arrangements. Where complete deletion is not technically feasible, appropriate measures are implemented to restrict access and further processing, as required by Applicable Data Protection Laws.

Additional information regarding retention periods applied by sub-processors, including any deviations from the standard periods described above, is available in the relevant sub-processor lists for each SaaS Service, accessible via the Privacy Center.

9. Artificial Intelligence (AI) Systems and Data Processing

OneSpan may use artificial intelligence (AI), including machine-learning–based technologies, within certain OneSpan products and related services. These technologies are used to support defined product functionalities such as security monitoring, fraud detection, risk assessment, analytics, customer support features, and service optimization. AI may also be used for internal operational purposes related to customer relationship management and the delivery, protection, and improvement of OneSpan products.

Where AI is used in OneSpan products, OneSpan will carry out any processing of Personal Data in compliance with Applicable Data Protection Laws and applicable artificial intelligence regulations.

OneSpan designs, deploys, and operates AI systems using a risk-based governance approach aligned with the EU Artificial

Intelligence Act (AI Act) and comparable international AI laws and standards. Depending on the nature and purpose of the AI system, this includes:

- identifying and documenting the intended use and risk profile of the AI system;
- implementing appropriate internal governance, documentation, and accountability measures;
- maintaining meaningful human oversight proportionate to the potential impact of the AI system; and
- applying measures to promote accuracy, robustness, cybersecurity, and traceability.

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

Where AI systems used in OneSpan products process Personal Data, such processing is limited to what is necessary for the specific, explicit, and legitimate purpose of the relevant product functionality. All AI-related processing remains subject to core data protection principles, including lawfulness, fairness, transparency, data minimization, purpose limitation, accuracy, and storage limitation.

Personal Data processed in connection with AI features may include data provided by users, data generated through interactions with OneSpan products, or data obtained from other lawful sources, as further described in the applicable product notices and annexes. Where feasible and appropriate, OneSpan applies safeguards 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 datasets that include Personal Data, OneSpan implements 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 processed within its products to train general-purpose AI models.

OneSpan does not use AI systems within its products to make decisions that produce legal effects concerning Data Subjects or similarly significantly affect them, unless such processing is expressly permitted by Applicable Data Protection Laws and appropriate safeguards are in place. Where applicable, these safeguards include the right to obtain human intervention, to express one's point of view, and to contest the decision.

Where required by law, OneSpan provides users with meaningful information about AI-enabled product features that materially interact with them, including the role of automation, the general logic involved, and the rights available to Data Subjects. Further details are provided in product-specific privacy notices and agreements.

Where OneSpan relies on third-party AI technologies or service providers as part of its products, OneSpan conducts appropriate due diligence and puts contractual safeguards in place to address data protection, confidentiality, security, and compliance with applicable AI regulations, including international data transfer requirements where relevant.

OneSpan actively monitors developments in AI regulation and standards worldwide and updates its AI governance framework, technical controls, and documentation as necessary to remain compliant with evolving legal and regulatory requirements.

10. Your rights as a data subject

In the context of OneSpan's products and services, OneSpan processes Personal Data in different capacities depending on the activity. For the SaaS Services, Professional Services conducted within a Customer's environment, Customer Support, and Distribution and Fulfilment operations, each Customer acts as the controller of the Personal Data of its authorized users and end users (together, Users), while OneSpan acts as a processor. For certain controller activities arising in direct connection with the delivery of these services—including project engagement management, support operations management, and contract administration—OneSpan acts as a controller in its own right, as further described in this Notice.

Accordingly, where OneSpan acts as a processor, Users should direct any requests relating to their Personal Data—including requests to access, rectify, delete or erase, restrict processing, object to processing, or exercise data portability rights—to

the relevant Customer, as the controller of their Personal Data. Where OneSpan processes Personal Data in its own capacity as a controller (for example, in the context of Professional Services engagement records, Customer Support case management records, and contract administration), Data Subjects may direct their requests directly to OneSpan at privacy@onespan.com.

Where a Customer does not have direct access to the relevant Personal Data or requires assistance to respond to a valid data subject request, OneSpan will provide reasonable assistance to the customer, in accordance with Applicable Data Protection Laws and the terms of the applicable data processing agreement. Such assistance may include enabling access to, correction of, deletion of, restriction of, or objection to processing of Personal Data, to the extent technically feasible and legally permitted.

If a User submits a data subject request directly to OneSpan in relation to Personal Data processed within a OneSpan SaaS product, OneSpan will not respond to the request on the customer's behalf but will, where appropriate, redirect the request to the relevant Customer or inform the User to contact the Customer directly.

For Data Subject rights relating to Personal Data processed by OneSpan in its capacity as a controller entirely independently of a customer relationship (for example, in connection with corporate websites, marketing communications, or recruitment activities), reference is made to the applicable section of the OneSpan Corporate Data Protection Notice available in the Privacy Center.

11. 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 or via any other channel in the list of Regulatory Contacts and Representatives in the Privacy Center. 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.

Information regarding OneSpan's Data Protection Officer, EU and non-EU data protection representatives, and other legally required representatives, including their contact details and jurisdictional scope, is maintained and kept up to date in the Digital Law Representatives document on the Privacy Center.

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

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.

12. Technical and organisational measures

OneSpan implements appropriate technical, physical, and organizational measures designed to protect Personal Data processed in connection with all of its products and services—including Products and Services—against accidental or unlawful

destruction, loss, alteration, unauthorized disclosure, or unauthorized access, as well as against any other form of unlawful processing.

Security measures for product-related processing (processor role)

When processing Personal Data on behalf of its Customers in the context of OneSpan products and services—including SaaS Services, Professional Services engagements conducted within the Customer's environment, Customer Support activities, and Distribution and Fulfilment operations—OneSpan acts as a processor. Access to Personal Data is strictly limited to authorized employees and trusted partners (including sub-processors, logistics providers, and service providers) who require such access to perform services under the applicable customer agreement. All such persons are subject to confidentiality and data protection obligations.

The specific technical and organizational measures applicable to OneSpan's Products and Services may be further described in the relevant product agreements and supporting security documentation. Detailed information on OneSpan's processor-level safeguards is available in the applicable Data Processing Addendum between the Customer and OneSpan. Global security and privacy obligations are detailed in the applicable agreement between Customer and OneSpan.

OneSpan cannot be held responsible for the unlawful or improper use of Personal Data by Customers, End Users, or third parties acting outside OneSpan's control.

Security measures for controller processing

Where OneSpan processes Personal Data in its capacity as a controller entirely independently of a customer relationship (for example, in connection with corporate websites or marketing activities), the applicable technical and organizational measures are described in the OneSpan Corporate Data Protection Notice, available in the Privacy Center. Where OneSpan processes Personal Data as a controller in direct connection with the delivery of its Product and Services, the applicable technical and organizational measures are as set out in this Notice, the applicable product agreements, and OneSpan's information security documentation available via the Privacy Center. Security incidents and suspected unauthorized processing are promptly assessed and addressed. Where required by Applicable Data Protection Laws, OneSpan will notify customers, affected individuals, and competent authorities of Personal Data breaches within the applicable legal timeframes, in accordance with its contractual and legal obligations.

Additional information regarding OneSpan's information security program, including an Information Security Overview, is available via the Privacy Center.

13. Annex 1-Personal Data Processing Overview

FROM WHOM AND WHICH PERSONAL DATA IS PROCESSED

Data Subject category	Categories of Personal Data	Source of data	Role of OneSpan
Customer representatives	Business contact information (name, email, telephone number, job title), account identifiers, transactional and billing data, payment method details, consent records	Provided directly by Customer; generated through contract administration	Controller
Users	User credentials (username, password), role and permission data, usage data for billing, product configuration data, authentication data	Provided by Customer or User; generated through use of Products and Services	Processor
End Users	Transaction-related data, identity and verification data, authentication data, transaction results	Provided by Customer or End User; generated through SaaS workflows	Processor
All Users and End Users	Documents uploaded to the Products and Services containing Personal Data	Uploaded by Customer, Users or End Users	Processor
Users / End Users (identity services)	Biometric data (e.g. facial features, voice patterns, fingerprints, iris or retina structures) for identity or document verification services	Submitted by Customer, User or End User	Processor

Data Subject category	Categories of Personal Data	Source of data	Role of OneSpan
All Users and End Users	Device identifiers, cookie IDs, IP address, geolocation data, browser and device information, log files	Collected automatically via Cookie Technologies and system logs	Processor
All Users and End Users	Product usage data (pages viewed, content clicked, search terms, navigation paths, performance metrics, behavioral and biometric usage data)	Observed during use of Products and Services	Processor
Prospective Customers (demos / trials)	Biometric data and other Personal Data submitted for demonstrations, testing, proofs of concept	Submitted voluntarily for demo or trial purposes	Processor

Biometric and other Personal Data submitted for demonstrations, trials, testing, or proofs of concept are used exclusively for the agreed purpose and are erased after completion of the relevant activity.

HOW PERSONAL DATA IS USED (PURPOSES OF PROCESSING)

OneSpan acting as a controller (customer relationship management)

Purpose	Description
Contract administration	Account creation, contract performance, billing, accounting, auditing, reconciliation, collection, compliance, enforcement
Communications	Communicating with Customers and Users regarding Products and Services, order status, updates, and account information
Security and fraud prevention	Protecting OneSpan, Customers, and End Users from fraud, misuse, and unauthorized activity
Legal compliance	Compliance with applicable laws, regulations, court orders, and lawful requests
Business intelligence	Analytics and reporting relating to performance, security, and operation of Products and Services
Product improvement	Use of professional contact data for quality control, analytics, and transaction reporting
Marketing communications	News, updates, industry events, promotions, surveys (subject to opt-out via Preference Center)
Marketing	Use of customer name in presentations, marketing activities, investor meetings and government filings. Press releases relating to Customer's status as a customer of OneSpan (with Customer's prior written consent)

OneSpan acting as a processor (delivery of Products and Services)

Purpose	Description
Service provision	Providing access to, operating, monitoring, configuring, testing, maintaining, supporting, and improving Products and Services
Authentication and identification	Verifying and authenticating Users and End Users
Personalization and analytics	Analyzing usage and performance to improve products and services
Contract performance	Performing contractual obligations towards Customers
Customer support	Communicating with Users regarding service functionality, updates, and support
Compliance assistance	Assisting Customers with compliance obligations and notifying Customers of unlawful instructions
Data protection by design	Masking identifiers; anonymization, pseudonymization, and encryption performed on behalf of Customers

OneSpan applies anonymization and pseudonymization techniques as part of its privacy by design and data minimization strategy. Anonymized, aggregated, or de-identified data may be used for analytics, testing, product development, service provisioning, and business development purposes, subject to applicable law. OneSpan does not re-identify such data.

LEGAL BASES FOR PROCESSING

OneSpan acting as a controller

Legal basis	Application
Consent	Where expressly obtained; withdrawal possible without affecting prior processing
Legal obligation	Compliance with applicable laws (e.g. taxation, AML, anti-corruption)
Vital interests	Protection of life or physical integrity
Legitimate interests	Customer communications, service improvement, analytics, and security, subject to balancing test
Third-party legitimate interests	Interests of service providers and sub-processors necessary to deliver Products and Services

OneSpan acting as a processor

Legal basis	Application
Contractual necessity	Processing required to perform the contract with the Customer
Customer instructions	Processing carried out on documented instructions of the Customer
Special categories of data	Processed only where Customer confirms existence of valid legal basis (e.g. consent or legal exception)

Where required by law, processing is governed by the OneSpan Data Processing Addendum, available via the Privacy Center.

ROLE OF SUB-PROCESSORS

OneSpan may engage sub-processors, specialist service providers, and approved logistics partners to support the provision of its products and services, including Products and Services. All such parties act only on documented instructions, are bound by contractual confidentiality and data protection obligations, and are listed per service in the Privacy Center. For Distribution and Fulfilment activities, certain external logistics providers and postal services may act as independent controllers for their own transport and delivery operations; their details are available in the applicable sub-processor and logistics provider lists in the Privacy Center.

Annex 1-Personal Data Processing Overview

1. SaaS Services-Personal Data Processing

Category of data subject	Categories of personal data	Purpose(s) of processing	Role of OneSpan	Legal basis (indicative)	Recipients / access	International transfers	Retention
Users (administrators)	Identification data (name, professional contact details), account credentials, role and permission data	Account creation, authentication, access management, administration of SaaS products	Processor	Performance of contract (Customer); legitimate interest (security)	Authorized OneSpan personnel; sub-processors providing hosting, support, security	As applicable; subject to safeguards (e.g. SCCs)	Duration of customer contract + post-termination retention as agreed
End Users (e.g. signers, verifiers)	Identification and contact data, transaction-related data, authentication or verification data	Execution of customer-initiated transactions, identity verification, fraud prevention, audit trails	Processor	Performance of contract (Customer–End User); legal obligation (where applicable)	Customer; authorized OneSpan personnel; relevant sub-processors	As applicable; subject to safeguards	As defined by Customer instructions and applicable law
Customer representatives	Professional contact details, communication records	Contract management, customer support, billing, relationship management	Controller	Performance of contract; legitimate interest	Authorized OneSpan personnel; CRM and support providers	As applicable	Contract term + statutory limitation periods

Category of data subject	Categories of personal data	Purpose(s) of processing	Role of OneSpan	Legal basis (indicative)	Recipients / access	International transfers	Retention
Website or product interface users	Technical identifiers (IP address, device/browser data), usage logs	Security monitoring, service performance, troubleshooting, analytics	Processor	Legitimate interest (security, service reliability)	Authorized OneSpan personnel; security and analytics providers	As applicable	Generally short-term; security logs per legal requirements
Support requesters	Contact data, support content, diagnostic information	Provision of technical support and incident handling	Processor	Performance of contract	Support teams; support tooling providers	As applicable	Duration necessary to resolve request + audit needs
Prospective customers (product-related)	Professional contact data, interaction history	Product demonstrations, trials, pre-contractual communications	Controller	Legitimate interest or consent	Sales and marketing teams; CRM providers	As applicable	Until prospect disengages or legal retention expires

2. Professional Services – Personal Data Processing

Scope of processing. In addition to the processing activities described above in relation to SaaS Services, OneSpan processes limited Personal Data in connection with the delivery of Professional Services, including implementation, upgrade, maintenance, advisory, customer success and long-term support services for hardware, SaaS, mobile, and on-premise customers. These services may be delivered globally by OneSpan Professional Services teams and are performed on behalf of the relevant contracting OneSpan entity.

Categories of Data Subjects. Customer contact persons; members of customer project teams; and technical user identifiers generated during service delivery (which are strongly pseudonymized and may not constitute Personal Data where re-identification by OneSpan is not reasonably possible).

Categories of Personal Data. Professional contact information (name, business email address, telephone number, business role); project-related communications with customer representatives; and limited technical and operational metadata such as login timestamps, user identifiers or system interaction records (generally pseudonymized). OneSpan does not normally access customer production data. Access to identifiable Personal Data within customer environments occurs only exceptionally and where strictly necessary for the agreed service scope.

Purposes of processing. Delivery of implementation, upgrade, configuration and maintenance services; customer success, guidance and long-term support engagements; project management, documentation and service continuity; technical troubleshooting, system optimization and service improvement; contract administration and proof of engagement; and communication with customer project teams.

Role of OneSpan. OneSpan acts primarily as a controller for customer relationship and service engagement management. Where processing is performed on behalf of the Customer within the Customer's environment, OneSpan may act as a processor in accordance with Customer instructions and the applicable Data Processing Addendum.

Legal basis. Performance of a contract with the Customer; legitimate interests in delivering, maintaining and improving services and maintaining business continuity; and compliance with legal and contractual obligations.

Retention. Personal Data relating to Professional Services engagements is retained for the duration of the Customer relationship and any active contract, and is generally deleted within a defined period after the end of the Customer relationship, unless a longer retention period is required for legal, contractual, audit or dispute resolution purposes. Where technically feasible, deletion or anonymization measures are applied after expiry of the applicable retention period.

3. Customer Support and Service Delivery – Personal Data Processing

Scope of processing. OneSpan processes Personal Data in connection with the provision of customer support and service delivery activities, including incident resolution, information requests, configuration changes, technical troubleshooting and operational support for its Products and Services. Support services may be delivered globally through distributed customer support teams and may involve cross-border processing within the OneSpan group and approved service providers.

Categories of Data Subjects. Customer administrators and support contacts; Customer employees or authorized users; End Users of Products and Services; and OneSpan support personnel involved in service delivery.

Categories of Personal Data. Identification and professional contact data (name, email address, role, language preference);

communication history and support case information; user identifiers, transaction identifiers and correlation identifiers; limited transaction metadata and operational records; sender and signer identification data (name, email address, mobile number, where relevant); portal access information and authentication-related metadata; and configuration and account-related information necessary for support resolution. No Special Categories of Personal Data are processed in standard customer support activities. For OneSpan Sign products, Customer support does not normally access Customer document content and processes only the data necessary to resolve support requests.

Purposes of processing. Providing technical support and incident resolution; handling Customer requests and configuration adjustments; managing Customer support tickets and case records; maintaining audit trails and operational logs; service delivery and continuous improvement of products and support services; managing portal access and authentication; and ensuring service continuity, troubleshooting and system reliability.

Role of OneSpan. OneSpan acts primarily as a controller for support operations, case management and service improvement. Where support activities involve processing Customer data within the SaaS Services, OneSpan may act as a processor on behalf of the Customer in accordance with the applicable Data Processing Addendum.

Legal basis. Legitimate interests in providing effective Customer support and maintaining service quality; performance of contract with Customers; and compliance with legal and operational obligations.

Retention. Personal Data processed for customer support is retained for the duration of the Customer relationship and applicable contract, and in accordance with OneSpan's data retention and deletion policies, unless a longer retention period is required for legal, audit, security or dispute resolution purposes. After expiry of the applicable retention period, data is deleted, restricted or anonymized where technically feasible.

4. Distribution and Fulfilment Services – Personal Data Processing

Scope of processing. OneSpan processes Personal Data in connection with the distribution and fulfilment of hardware authentication devices (including Digipass tokens) on behalf of its Customers. Processing activities may include receiving End User shipment data from Customers, performing required trade control and sanctions compliance checks, linking devices to recipients, printing personalized packaging materials and managing physical shipment. Distribution activities are performed from Belgium (EU distribution) and the United States (US distribution), depending on the Customer's region.

Role of OneSpan. The Customer acts as the controller of End User Personal Data. OneSpan acts as a processor providing logistics and fulfilment services on behalf of the Customer. Certain external logistics providers and postal services act as independent controllers for their own processing activities.

Categories of Data Subjects and Personal Data. End Users receiving hardware devices (first and last name, professional or private delivery address, email address and telephone number where provided, unique Customer-specific End User identifier, and device serial number); Customer contact persons managing logistics; and representatives of Customers or service providers involved in shipment coordination. No Special Categories of Personal Data, judicial data or biometric data are processed in this context.

Purposes of processing. Managing hardware distribution and shipment; linking devices to End Users; printing personalized labels and packaging documentation; performing trade control and sanctions screening where legally required; maintaining audit logs and operational records; and ensuring secure and traceable delivery of authentication devices. Distribution and fulfilment services are designed to minimize access to Personal Data. End-User data is processed solely for shipment purposes and is not used for marketing, profiling or any other secondary purpose.

Retention. Live shipment data processed in Belgium is retained for a short operational period (approximately 14 days) before deletion from the live system. Encrypted backups are retained for up to one year, after which they are automatically deleted in accordance with backup lifecycle policies. In certain contractual arrangements, retention may be adjusted in accordance with Customer instructions.

International transfers. EU distribution activities are hosted within the European Union. US distribution activities are performed within the United States for US-based Customers. Where cross-border transfers occur within the OneSpan group, appropriate safeguards are applied in accordance with Applicable Data Protection Laws, including Standard Contractual Clauses where required.se

Security measures. OneSpan applies encryption in transit and at rest (including hardware security modules for cryptographic protection), role-based and logical access controls, logging and monitoring of fulfilment activities, secure hosting in controlled data centre environments, and an annual SOC 2 audit of distribution services.

14. Annex 2-Data Sharing Overview

CATEGORIES OF RECIPIENTS AND PURPOSES OF SHARING

Recipient category	Who this includes	Purpose of sharing	Role of recipient	Safeguards applied
OneSpan group companies	OneSpan affiliates worldwide	Internal service delivery, support, security, compliance, and administration	Processor or controller (context-dependent)	Intra-group agreements; confidentiality obligations; security controls
Sub-processors	Cloud hosting providers, infrastructure providers, security, identity verification, analytics providers (as listed per product) Ticketing system Support system CRM system	Provision, operation, maintenance, support, and security of SaaS Services	Sub-processor	DPA; confidentiality; technical and organizational measures; audit rights
Service providers (may also be sub-processors)	IT, hosting, billing, reporting, analytics, managed services, auditing providers	Enable business functions related to the Products and Services	Processor / independent contractor	Contractual confidentiality and data protection clauses
Customers (controllers)	Contracting Customer entity	Enable Customers to manage Users, End Users, transactions, and compliance	Controller	Contractual access controls
Public authorities and government bodies	Courts, regulators, law enforcement, public authorities	Compliance with legal obligations, lawful requests, protection of rights and safety	Independent controller	Disclosure limited to legal requirement; customer notification where permitted
Other users / public	Community forums, blogs, chat rooms	User-initiated publication of content	Independent third parties	User-configurable settings; platform rules

An up-to-date list of sub-processors and approved service providers applicable to each Products and Services is available in the Privacy Center. For Distribution and Fulfilment services specifically, the following additional categories of recipients may be involved: (i) external logistics providers and postal or courier services, who may act as independent controllers for their own delivery operations; (ii) trade control and sanctions screening service providers; (iii) approved hosting and backup infrastructure providers for shipment data. Personal Data shared with these recipients is limited to what is strictly necessary for the relevant fulfilment or compliance purpose.

RESOURCES

The following resources are available via the Privacy Center (https://www.onespan.com/privacy-center):

Resource	Location	Contents
Sub-processor list (in the Data Processing Overview)	Privacy Center	List of approved sub-processors and processing jurisdictions.
Data Processing Addendum	Privacy Center	Standard Contractual Clauses and data protection terms
Global Biometrics Data Protection Statement	Privacy Center	Full notice of which this Annex forms an integral part
List of Regulatory Contacts and Representatives in the Privacy Center	Privacy Center	Channels to contact Onespan
Cookie Statement	Privacy Center	OneSpan's use of Cookie Technologies and available

Resource	Location	Contents
		controls are described in detail in the Cookie Notice, accessible at www.onespan.com/cookie-statement.
Preference Center	Privacy Center	Marketing communication preferences and opt-out
Corporate Data Protection Notice	Privacy Center	Personal Data processed in connection with customer use of OneSpan's business activities.
OneSpan Entity List	Privacy Center	List of OneSpan affiliates/group companies and countries of operation