

OneSpan PRIVACY NOTICE

OneSpan Inc. and its affiliated entities worldwide (“OneSpan”, “we”, “us” or “our”) value your privacy and the protection of your personal and personally identifiable information (collectively “Personal Data”).

In this Privacy Notice, we describe how OneSpan uses Personal Data obtained by OneSpan from or about you both online and offline. You will find below quick links to the material contents of OneSpan’s Privacy Statement that describe OneSpan’s privacy practices on your use of OneSpan websites (the “Site”), OneSpan applications (including mobile applications) (the “Application”), and OneSpan products, software and cloud solutions, and services made available on the Site (collectively “OneSpan Services”).

- [OneSpan Privacy Statement](#)

- [Personal Data that OneSpan Collects as Controller](#)
- [Information We Collect & Process on Behalf of Customers](#)
- [Why OneSpan Collects Personal Data](#)
- [Passive Collection of Personal Data Collected Through the Site or the Application](#)
- [Third-Party Tracking Technologies and Services](#)
- [User Profile, Preferences, and Opt-Out](#)
- [Other Important Privacy Information](#)
- [Personal Data in Community Forums](#)
- [Links to Third-Party Websites or Application](#)
- [Do Not Track](#)
- [Collection, Use, and Processing of Personal Data Collected Online and Offline](#)
- [Storage, Transfer, Disclosure, and Retention of Personal Data](#)
- [Intra-Company Transfer](#)
- [Additional Communication](#)
- [Customer Reference](#)
- [Access, Correction, and Deletion of Personal Data](#)
- [Data Security](#)
- [Anonymisation, Pseudonymisation, or Encryption and Use of De-identified Data](#)
- [Your Rights as Data Subject under GDPR](#)
- [OneSpan Data Protection Officer](#)
- [Contact Us](#)

For detailed privacy information related to where a OneSpan Customer and/or a Customer affiliate who uses the OneSpan (cloud) Products and Services is the controller, please reach out to the respective Customer directly. We are not responsible for the privacy or data security practices of our Customers which may differ from those set forth in this Privacy Statement or the OneSpan Product and Services Privacy Statement.

Please read the respective Privacy Statements in or linked to this Notice and the [Terms of Use](#) before you continue browsing the Site. If you disagree with OneSpan’s privacy practices, please do not access or use the Site and do not transfer Personal Data to OneSpan. By accessing or otherwise using the Site, you indicate that you have read the revised Privacy Statement and consent to its terms.

We may update OneSpan’s Privacy Statements from time to time to reflect changes to OneSpan’s Personal Data handling practices. We may require that you expressly opt-in and acknowledge that you agree to the respective Privacy Statements and the Terms of Use applicable to the Site or the Application.

We encourage you to review the Privacy Statements on a regular basis and whenever you elect to provide personal information to OneSpan. You will be notified of material revisions to this Privacy Statement electronically or by other means that OneSpan deems sufficient to reach your attention, such as a prominent post on the Site, the Application, or the OneSpan Services.

OneSpan Privacy Statement

This Privacy Statement describes privacy practices of OneSpan in the collection, processing, use, storage, transfer, and disclosure of Personal Data obtained from or about you online or offline when collected by other means than via the Site or the Application. This Privacy Statement supplements every other Privacy Statements that apply to the Application and to OneSpan Services.

OneSpan collects, uses, and processes your Personal Data as legally permitted under applicable Data Privacy Laws.

Definitions

“Contract Party” is an organization or individual that is a principal in a contract with OneSpan.

“Data Protection Laws” means data protection laws applicable to the Processing of Personal Data under this Privacy Statement, including but not limited to the [General Data Protection Regulation \(EU\) 2016/679](#) (“GDPR”).

OneSpan may process your Personal Data under the following legal bases:

- Contracts – in case you are a Contract Party, or you represent one: OneSpan collects and processes your Personal Data and those of your representatives to the extent necessary to create the contract or to fulfill OneSpan's obligations under the contract with you or with the person or entity you represent, as well as for billing, reporting, or other legitimate business purposes.
- Consent – when you give your explicit consent, such as when you apply for a job, create a user account, subscribe to a newsletter, access any OneSpan webcast, forum, information or materials from the Site or Application; or when you visit our branded social media pages; use or access OneSpan Services as a Contract Party or by authority of a Contract Party; or if you do not exercise your right to opt-out of marketing communications to the extent permitted by applicable law.
- Compliance with a legal obligation – in case OneSpan is required by law to process Personal Data for a particular purpose.
- Legitimate interest – in case you are a Site or Application user or you are a Contract Party or a representative of the Contract Party, OneSpan may process Personal Data without your explicit consent if OneSpan has a genuine and legitimate reason, unless outweighed by harm to your rights and interests.

OneSpan does not direct or promote the Site, Application, or OneSpan Services to persons under 18. OneSpan does not knowingly solicit or collect Personal Data from persons under 18.

OneSpan strives to handle your Personal Data in a manner consistent with applicable Data Protection Laws.

If you submit Personal Data of or about other persons, you represent that you have their consent or authority to consent to this Privacy Statement. To comply with Data Protection Laws, OneSpan may require that you signify in writing your consent or authority to consent to this Privacy Statement. If you believe that your Personal Data has been provided to us improperly, or if you would like to otherwise exercise your rights relating to your Personal Data, please notify us by sending an email to privacy@onespan.com.

OneSpan may have entered into separate written agreements with you or the Contract Party that contain specific data protection provisions, in which case, the more restrictive terms of such other written agreements prevail over general terms of this Privacy Statement in the context of the agreement.

Personal Data that OneSpan Collects as Controller

Personal Data that OneSpan collects as Personal Data controller may include:

- your name, business title and/or occupation, salutation, contact details such as telephone, mobile, or fax, email and/or postal address, username, password, photograph and/or biographical information, social media profile, and/or areas of expertise when you: (i) communicate in person, electronically, by telephone, or in writing with any OneSpan employee or representative; (ii) purchase any OneSpan product or service from OneSpan or a OneSpan channel partner; (iii) apply or register for or attend any training, certification program, or event, webinar, or contest involving a OneSpan product, service, or promotional activity; (iv) subscribe to the OneSpan newsletter or download Site content; (v) are the Contract Party, or director, officer, employee, or representative of a Contract Party in the preparation, execution, and/or performance of a contract with OneSpan; or (vi) register for an online community that we host;
- corporate and billing Personal Data of the Contract Party;
- Contract Party bank account details when entitled to receive payment from OneSpan or payment service Personal Data when required to make payment to OneSpan;
- biometric data that you elect to submit to us for demonstration or other agreed purposes, subject to separate [Data Protection Notice](#) as to OneSpan's collection and use;
- your consent to OneSpan's processing of your Personal Data if applicable;
- your consent to marketing permissions on the use of cookies and other data collection techniques;
- passive Personal Data about your device and usage of the Site or the Application as further detailed [below](#);
- if you apply for a job position or inquire about career opportunities, your résumé or curriculum vitae, your areas of interest or message topic, your language preferences, or such similar Personal Data that OneSpan requests. For more information on our recruitment activities, please consult our [Talent Acquisition Privacy Statement](#)

Information We Collect & Process on Behalf of Customers

When OneSpan Customers use OneSpan Services, depending on the nature of the Service it is possible that OneSpan processes and stores certain information on their behalf as a data processor. For example, in Services where a Customer (or the Customer's authorized users) uploads contracts or other documents for handling, reviewing, authentication, automation, review or signature, OneSpan is to be considered as a data processor and process information on the Customer's behalf and in accordance with Customer's instructions. The Customer, as the data controller has the responsibility over the processing of the information.

Why OneSpan Collects Personal Data

OneSpan collects and uses Personal Data collected online

(1) in the operation of OneSpan's business, such as:

- to create a contract and to carry out our obligations arising from any contract between you as Contract Party and OneSpan;
- to allow access and use of the Site, Application, or the Developer Portal, Customer Portal, Partner Portal, Online Training Services and similar sites;
- to provide OneSpan products, services, technical support, and to resolve Site user problems;
- to perform data analysis for product, service, and/or privacy enhancement;
- to develop aggregate analysis and business intelligence that enable OneSpan to operate, protect, make informed decisions, and report on the performance of our business and the services our customers' desire
- to allow access to downloadable materials and third-party resources;
- to perform accounting, auditing, billing, reconciliation, and collection activities;
- to process online applications for job vacancies and spontaneous job applications;
- to verify user compliance with the [OneSpan Terms of Use](#);
- to test, improve, and develop products and services;
- to monitor your use of the Site, Application, and any apps and tools in our systems
- to enhance security, and to protect OneSpan from fraud or other inappropriate conduct.

(2) in facilitating delivery of OneSpan information, such as:

- to communicate with you and other users, send OneSpan notifications and communication to users on current and new products or services and related news updates, programs or events;
- to respond to inquiries, send administrative Personal Data and service notifications;
- to allow participation in a survey, community discussion, blogs, chat forums, or message boards;
- to tailor content and improve Site quality and user experience and notify users of changes or updates to the Site or the Application;
- to tailor marketing to users' and subscribers' needs; remarket and advertise to previous Site users; and
- to customize, measure, and enhance effectivity of promotional events and communications to customers; and
- to track marketing campaign results and responses.

OneSpan collects Personal Data offline:

- to create or perform a contract;
- to respond to a request or to perform a required activity;
- to communicate news and updates on OneSpan products and services;
- to enhance OneSpan's business programs and the relevance of OneSpan's marketing activities, product and service offerings.

Passive Collection of Personal Data Through the Site or the Application

Passive Personal Data that OneSpan may automatically receive as you navigate through the Site or the Application or through your use of certain browsers, applications, or devices, and without you actively providing the Personal Data, include your IP address, browser and device Personal Data and identifier, operating system type and version, location, date, time and time zone, network routing Personal Data, equipment versions, and similar Personal Data. OneSpan employs third-party service providers of various technologies that gather select passive Personal Data to enable OneSpan to conduct statistical analysis for marketing and Site and service enhancement purposes.

Third-Party Tracking Technologies and Services

OneSpan and third-party service providers of tracking technologies gather non-personal information using passive data collection techniques such as cookies, web beacons, tags, and other tools that provide OneSpan with Site activity data reflecting how you enter, navigate, and leave the pages you visit on and through the Site or the Application, the frequency of your visit and length of stay on any part of the Site or the Application or third-party websites, application or device usage data, and your product or service preference indicated by the number of times and the length of time you view a product.

Cookies are small and sometimes encrypted text files sent from the Site or the Application to your browser or hard drive that store bits of Personal Data about you and your use of the Site or the Application. Cookies allow OneSpan to remember the products and services you request, to assist with the downloading or uploading of documents and other materials from and to the Site or the Application, to create a more personalized user experience, to analyze Site traffic, and to improve Site content and display. Cookies may last until you close your browser, or until you delete them manually or until they expire. Cookies may collect a unique identifier and store user Personal Data such as IP addresses, navigational data, server Personal Data, data transfer times, user preferences, and Personal Data including username and password you provide for a user account you establish.

To manage your privacy preferences, you may configure your Internet browser using the “help” function in order to alert you when a cookie is sent or used and allow you the option to accept, reject or remove cookies. You can, in general, manage interest-based advertising or completely opt-out by indicating your choice in www.aboutads.info/choices. If you reject, disable or remove cookies, you might not be able to access certain pages or important functions on the Site or the Application.

You may configure your Internet browser using the “help” function to alert you when a cookie is sent or used and allow you the option to accept, reject or remove cookies. You may opt-out of interest-based advertising at www.aboutads.info/choices. If you reject, disable or remove cookies, you might not be able to access certain pages or important functions on the Site or the Application.

You may review OneSpan’s [Cookie Policy](#) describing OneSpan’s use of cookies in more detail.

Remarketing tags such as a pixel tag or a clear GIF, and universal website tag are snippets of code that OneSpan adds on certain pages of the Site or the Application. A tag is a “web beacon” that appears as a clear graphic image of a 1x1 pixel delivered through a web browser or an HTML compliant e-mail client application to a user’s device. OneSpan uses these remarketing tags together with cookies to reach previous Site visitors for marketing activities.

Use of data collected with cookies and remarketing tags is governed by this Privacy Statement as to OneSpan’s use, and by the respective service providers’ Privacy Policies as to their data use.

Locally shared objects, also called “flash cookies,” are pieces of data that websites using Adobe Flash may store on your computer. OneSpan will use the Personal Data collected to find out how you navigate the Site or the Application. You may disable this function by referring to www.adobe.com for Personal Data. If you disable or disallow locally shared objects, you might not be able to access certain pages or important functions on the Site or the Application.

Internet Protocol (IP) addresses and log files are used to identify server problems, improve Site content, and compile aggregated statistics about Site usage and click-stream data. The Site also uses electronic images, known as web beacons, to help personalize your experience and perform standard Site traffic analysis in a manner similar to the use of cookies. OneSpan reserves the right to introduce new passive tracking technologies and techniques related to the use of the Site or the Application, subject to and in accordance with applicable data protection laws and regulations.

Third-Party Web Analytics Tools

The table below shows third-party tools and tracking technologies that OneSpan employs for marketing activities, with links to the respective Privacy Policies and Opt-out/Preferences Settings.

Third-Party Analytics Tool and Service Provider	Description of Purpose and Use	Link to Privacy Policy	Link to Opt-Out and Settings Preferences
Google Ads and DoubleClick by Google	<p>Cookie IDs target OneSpan advertising that is relevant to the Site, to control the frequency of ads shown to the visitor, and to help OneSpan monitor, improve, and evaluate its online advertising and campaign performance. Cookies allow OneSpan to remarket to previous visitors of the Site and other OneSpan websites by targeting or excluding such users in relation to specific marketing activities, and allows OneSpan to advertise on third-party websites and on a Google search results page or a site in the Google Display Network.</p> <p>Google Ads and DoubleClick cookies contain no personally identifiable Personal Data. With the Site visitor’s consent, Personal Data associated with the DoubleClick cookie may be added to the visitor’s Google account.</p>	http://www.google.com/policies/privacy/	<p>To adjust Google Ad Preferences: http://www.google.com/settings/ads/onweb/. Manage your Ad Settings by installing Google’s advertising cookie Opt-out plugin: www.google.com/settings/ads/plugin</p>
Google Analytics (including Google Universal Analytics) by Google	<p>Analyzes web traffic and enables Google and OneSpan to monitor Site use across multiple devices and browsers as well as on online and offline devices, for the purpose of optimizing the services and simplifying the registration process. The cookie generates Personal Data that is communicated to and saved in a Google server. Google and OneSpan use this Personal Data to evaluate Site use, generate Site traffic reports, and provide additional services associated with the use of the websites and the Internet. If applicable, Google will pass this Personal Data to third-party data processors acting on behalf and for the</p>	http://www.google.com/policies/privacy/ http://www.google.co.uk/intl/en/analytics/privacyoverview.html	<p>To set your preferences or opt-out of Google Analytics: https://tools.google.com/dlpage/gaoptout</p>

	account of Google and/or OneSpan, or when required by law.		
Google Optimize by Google	Uses Google Analytics to improve conversions. The tool uses automatic data collection technologies to collection certain information about a Site user's equipment, browsing actions, and patterns of a Site user's visit, traffic data, geolocation data, logs, and information about the computer and internet connection, IP address, operating system and browser type.	https://policies.google.com/privacy?hl=en	To set your preferences or to opt-out: https://policies.google.com/privacy?hl=en#infochoices
Hotjar by Hotjar	A technology service that helps us better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our website). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor OneSpan will use this information to identify individual users or to match it with further data on an individual user.	https://www.hotjar.com/legal/policies/privacy	To opt-out of Hotjar tracking: https://www.hotjar.com/legal/compliance/opt-out
Facebook Tag API and Custom Audience Pixel by Facebook	Tags collect data about activities of Site users and visitors of certain parts of www.onespan.com that are sent to Facebook to track conversions and to allow OneSpan to create custom audiences for the products or service that OneSpan may advertise on Facebook.	https://www.facebook.com/about/privacy/	To adjust Facebook ad settings: https://www.facebook.com/about/ads/
Universal website tag of Twitter	Allows Twitter to measure conversions across multiple devices and platforms, which conversion data OneSpan uses in aggregated and anonymous form for optimized OneSpan advertising campaigns at Twitter, and to improve and tailor remarketing to Site visitors with Twitter accounts.	https://twitter.com/privacy?lang=en	To opt-out of interest-based advertising or adjust Twitter ad settings: https://support.twitter.com/articles/20170405#
Demandbase Website Platform Services by Demandbase	Uses cookies and web beacons such as invisible tracking pixels to gather non-personally identifiable Personal Data such as browser version, operating system, IP address, cookie Personal Data, time stamps, from which OneSpan gathers company and other firmographic data associated with your IP address. Cookies are readable only by Demandbase, with identifiers that may be linked to certain non-personally identifiable Personal Data or non-personally identifiable advertising IDs from third parties.	https://www.demandbase.com/privacy-policy/	To opt-out of cookie-based advertising: http://a.company-target.com/opt-out To opt-out of personalized advertising delivered by other participating companies: www.aboutads.info/choices
Yahoo Gemini by Yahoo	Uses web beacons and persistent cookies for digital advertising, and serves digital ads to both new Site users and to customers of https://www.esignlive.com/ on Yahoo pages.	http://info.yahoo.com/privacy	To adjust Yahoo Ads Settings: http://info.yahoo.com/privacy/us/yahoo/opt_out/targeting/details.html To opt-out of Yahoo Ads: https://aim.yahoo.com/aim/us/en/optout/index.htm
Flurry Analytics by Yahoo	OneSpanSign employs mobile device analytics software development kits (SDK) allowing OneSpan to track and measure how you interact with associated mobile applications, and to collect data that include app usage, the number of sessions running on an app and how long the sessions run, user location, number of app crashes and errors, operating systems and devices running the app, the number of times certain app features are used. Flurry uses analyzed user data to deliver tailored mobile advertisements.	https://termsfeed.com/blog/privacy-policy-flurry/	To opt-out of Yahoo Ads: https://aim.yahoo.com/aim/us/en/optout/index.htm

LinkedIn Marketing Solutions by LinkedIn	Allows OneSpan to deploy digital display ads and video ads across the LinkedIn platform to OneSpan customers who are registered members of LinkedIn.	https://www.linkedin.com/legal/privacy-policy	Ad preferences may be adjusted on your LinkedIn account
Visual Web Optimizer by Wingify	Uses web forms, technologies like cookies, web logging, and others to collect data in aggregated form for use such as in its conversion optimization services.	https://vwo.com/privacy-policy/	To opt out of VWO tracking: https://vwo.com/opt-out/
Marketo Social Marketing (MSM) by Marketo	MSM social tracking cookie tracks members/non-members of social media for behavioral advertising, analytics, market research. Cookie expires after 24 months.	http://www.marketo.com/trust/legal/privacy/	
Marketo Munchkin Cookie by Marketo	Munchkin cookies give OneSpan Personal Data on email open rates and click through rates. Site activity is tracked, such as when visitors download marketing white papers from the Site or the Application, Marketo cookies enable OneSpan to see who does this and if they visit other parts of the Site or the Application.	http://www.marketo.com/trust/legal/privacy	
Alexa web beacons, cookies, and pixels in Toolbar Service by Amazon	Alexa tools in the Toolbar Service you use allow Alexa to measure internet activity, such as the websites you visit, searches you perform, and pages you view.	http://www.alexa.com/help/privacy	You may disable the Toolbar Service on the Options Menu of your Amazon account
AddThis Tools (cookies and pixels) by AddThis	AddThis cookies or a third-party web beacon collect certain anonymous Personal Data when you visit the Site or the Application and other websites to provide advertisements about goods and services likely to be of interest to you. Cookies analyze Site audience to improve Site design and content.	http://www.addthis.com/privacy/privacy-policy	To opt-out: http://www.addthis.com/privacy/opt-out-saved To opt-out in US: http://www.aboutads.info/choices/ or http://www.networkadvertising.org/choices/ To opt-out in EU/EEA: http://www.youronlinechoices.eu/
One by AOL	Analyzes Site audience to improve Site design and content, and used by OneSpan for Site user retargeting.	http://privacy.aol.com/	To opt-out: http://www.youronlinechoices.com/opt-out-interface
Bing Ads by Microsoft	Bing Ads cookies collect Site usage data.	https://privacy.microsoft.com/en-us/privacystatement	To adjust Microsoft ads: https://choice.microsoft.com/en-US/opt-out

User Profile, Preferences, and Opt-Out

To gain full access to certain areas of the Site or the Application in order to obtain a service, request for Personal Data, download materials, or subscribe to or participate in certain OneSpan programs, OneSpan may require you to create a user account and maintain a user profile.

You can control your preferences for using the Site or the Application including opting into or out of marketing Personal Data and certain programs and interests in your user account or by informing OneSpan at privacy@onespan.com. You can opt-out of electronic communications by clicking the unsubscribe or opt-out link in OneSpan's marketing communication. You can access your user profile at any time to change your preferences or make other modifications.

Several OneSpan websites may require separate user registrations for you to obtain the services and Personal Data offered in those websites. Certain OneSpan websites will permit automatic access to other OneSpan websites so that by logging into one user account, you may automatically be signed in to other OneSpan websites. Other OneSpan websites may have different purposes, uses, and collection techniques than those indicated in this Privacy Statement. Please always review the Privacy Statement of the OneSpan website that you access before providing your Personal Data.

Other Important Privacy Information

Personal Data in Community Forums

When you participate in a OneSpan Community Forum in the Site, Application, or third-party websites, you take sole responsibility for Personal Data and content that you publish, and you acknowledge that any Personal Data you volunteer will be accessible to and may be collected and used by the community of users. OneSpan has no control over Personal Data and content that users share and publish in Community Forums. OneSpan reserves the right to

remove, in whole or in part, published content deemed offensive or inappropriate, and to disallow continued participation of the user responsible for such content.

When you publish in a Community Forum any Personal Data or content, you warrant and represent that you have the right to cause its publication, and you grant OneSpan a perpetual, royalty-free, worldwide license to use, transmit, display, copy, distribute, and exploit such content.

[Links to Third Party Websites or Applications](#)

The Site may use or link to social media features, such as the Facebook “like” button, the “Tweet” button and other sharing widgets (“Social Media Features”). Social Media Features may provide you the option to post information about yourself or your Site activities to your profile page via a third-party social media network in order to share with others within your network. When you click on a Social Media Feature that is linked from the Site and hosted by the respective social media network, such network may receive information showing that you have visited the Site. If you are logged in to your social media account, the respective social media network can link your visit to the Site with your social media profile. You may opt-out of tracking activities of social media networks by adjusting your privacy preferences on your respective social media account. Your interactions with Social Media Features linked from the Site are governed by the privacy statements of the third-party providers of the relevant Social Media Features.

The privacy practices set forth in this Privacy Statement apply to this Site and the Application and the specified activities. Other websites, whether operated by OneSpan or by third parties, may have different privacy practices. Please review the privacy policies of such other websites that you access through the Site or the Application. OneSpan is not responsible or liable for the content of third-party websites or for third-party compliance with applicable laws and regulations.

[Do Not Track](#)

OneSpan does not process or respond to "Do Not Track" signals from your browser or other mechanisms that enable consumer choice regarding the collection of Personal Data about one's online activities over time and across third-party websites or online services.

[Collection, Use, and Processing of Personal Data Collected Online and Offline](#)

In the context of a contractual relationship, OneSpan will collect only Personal Data of a Contract Party and its representatives, and will use and process such Personal Data only as necessary for the execution and performance of a contract, and according to specific instructions of the Contract Party that provides such Personal Data and to specific instructions of the individual that owns the Personal Data.

Personal Data collected directly or indirectly from or about you or a Contract Party and its representatives may be used and processed by OneSpan in the countries where OneSpan operates, as may be reasonably expected in the conduct of OneSpan's business and the respective OneSpan departments' specific responsibilities, such as: the execution of a proper contract and compliance with transactional law; compliance with general applicable law and reporting requirements; manufacture and processing of a product according to certain customer requirements, delivery of software or hardware products, provision of maintenance and support or performance of professional, incidental, or other contracted services; procurement of supplies and services; processing of payments, audits; conduct of research, marketing events and related promotional activities.

If OneSpan receives Personal Data or other personal data that it has not requested, OneSpan will treat such Personal Data or other personal data in like manner as Personal Data actively collected in cases where the Personal Data has, in OneSpan's discretion, significance to a contract or transaction to which OneSpan is a party. In any other case and if practicable, OneSpan will delete or destroy the Personal Data or other personal data.

[Storage, Transfer, Disclosure, and Retention of Personal Data](#)

OneSpan hosts the Site or the Application on its servers or on servers of third parties that may be located in the EU, Switzerland, and Canada, or in the US. Your Personal Data may be stored and processed in a country where OneSpan operates. By using the Site or the Application and/or providing Personal Data to OneSpan, you consent to the transfer of Personal Data across OneSpan's subsidiaries in countries outside of your country of residence and other locations which may have different data protection regulations than those of your country. OneSpan does not rent or sell your Personal Data to any third party.

OneSpan may disclose and transfer Personal Data to subprocessors such as IT providers, subcontractors, and other third-party service providers that assist with the operation of the Site or the Application, our business or marketing activities. OneSpan requires its subprocessors to enter into agreements that satisfy the requirements of applicable Data Protection Laws including the GDPR.

OneSpan may disclose and transfer Personal Data to a third party in relation to any merger and acquisition or other similar activities.

OneSpan may disclose and transfer the Personal Data to protect the security of the Site or the Application, the rights of OneSpan, its subsidiaries, directors, officers, and employees, or individual rights of other parties. OneSpan may disclose Personal Data to law enforcement authorities or other government officials, in response to legal matters and as required by law (including applicable Freedom of Personal Data or similar law) or by legal process, when necessary to protect property, prevent harm or loss, or in connection with any investigation such as for fraud or illegal activity.

Subject to applicable Data Protection Law, OneSpan may retain Personal Data:

- after you have closed your account to inform you about OneSpan products, services and publications we think you may be interested in, until you "unsubscribe" or inform us by email that you are no longer interested to receive marketing communications
- for as long as necessary to fulfill the purposes for which it was collected or as permitted by applicable laws or regulations, to protect our legal rights or those of third parties, or to comply with the law and our record keeping requirements
- about how you have used our products and services in order to improve and develop our business.

After expiry of the applicable retention periods, OneSpan will delete your Personal Data. OneSpan has set in place appropriate measures to prevent any further use of data including Personal Data that we are unable, for technical reasons, to delete entirely from our systems (such as back-up data). To the extent it is not contrary to any legal requirements or to a legitimate interest of OneSpan, OneSpan will delete your Personal Data as soon as you inform us that you do not wish OneSpan to process your Personal Data any longer. Please contact privacy@onespan.com with the appropriate request.

Intra-Company Transfer

OneSpan applies the Standard Contractual Clauses for intra-company transfer of Personal Data to affiliates located outside of the European Economic Area or in countries with no adequate data protection laws according to the European Commission standard. Personal Data may be transferred, accessed, and stored at global facilities of service providers engaged by OneSpan, as necessary for the provision of the products and services, for the reasonable conduct of OneSpan's business operations and activities, and when the transfer is legally permissible and appropriate for the purposes described in this Privacy Statement.

Personal Data may be transferred to jurisdictions that may not offer an adequate level of protection such as defined in the General Data Protection Regulation (GDPR), in which case, OneSpan will ensure that the data recipient adequately safeguards the Personal Data. A data recipient that qualifies as a data processor will be required to process the Personal Data in accordance with OneSpan's instructions and the GDPR, as applicable.

Additional Communication

With your consent, your Personal Data will be added to OneSpan's internal mailing list so we can furnish you with product Personal Data via email, telemarketing, fax, SMS, and postal mail, as legally permitted. Also, OneSpan may disclose and transfer Personal Data to OneSpan partners or resellers for the marketing of OneSpan products and services.

When you unsubscribe or opt-out as described in the individual communication, or contact OneSpan as indicated in this Privacy Statement, you will be removed from the selected marketing communications and/or subscribers list within ten (10) business days.

Customer Reference

OneSpan may refer to the company that you represent as a Contract Party ("Customer") in presentations, marketing activities and investor meetings. With the Customer's prior consent, OneSpan may issue a press release relating to Customer's status as a customer of OneSpan products or services.

Access, Correction, and Deletion of Personal Data

You may directly access, modify, update, or delete all or part of your Personal Data in your user profile, or you may request OneSpan at privacy@onespan.com to modify, delete or restrict processing of your Personal Data. OneSpan will make every reasonable effort to promptly comply with your request. OneSpan may, however, limit access to your Personal Data where such access is unreasonably burdensome or expensive under the circumstances, or as otherwise permitted by international standards. To protect your privacy and the integrity of your Personal Data, OneSpan may take reasonable steps to verify your identity before responding to your request, and to validate any request affecting your Personal Data when presented anonymously or when made upon an assumed name.

Data Security

Pursuant to applicable Data Privacy Laws, OneSpan maintains reasonable technical and organizational measures to protect the Site from intrusion and to protect Personal Data against accidental or unlawful destruction or loss, alteration, unauthorized disclosure or access. Safeguards applied to protect the Site and the Applications include hardening, regular vulnerability scanning, security testing on the server, and periodic deployment of security patches.

Anonymisation, Pseudonymisation, or Encryption and Use of De-identified Data

Certain OneSpan products or services employ masking of certain identifiers related to Personal Data that you or a Contract Party submits or will submit to OneSpan in the process of obtaining the product or service. When associated with a OneSpan product or service, Personal Data de-identification such as by anonymisation, pseudonymisation, and encryption is performed by or for and on behalf of a Contract Party.

OneSpan employs anonymisation techniques and pseudonymisation methods on sets or subsets of Personal Data identifiers as part of OneSpan's privacy by design strategy, risk minimization, or data minimization strategy. Data rendered anonymous, aggregated data and statistical information, and data not attributable to an individual after pseudonymisation or encryption using OneSpan proprietary applications or third-party tools are or may be used and shared in the context of analytics, testing, product, service or business development or enhancement.

Use of anonymised or other de-identified data boosts OneSpan's ability to offer you and the OneSpan customer community enhanced risk forecasting and protection, as well as privacy protection.

Your Rights as Data Subject under the GDPR

The right to access – You have the right to request for copies of your Personal Data. We reserve the right to charge a small fee for this service.

The right to rectification – You have the right to request the correction of information in your Personal Data you believe is inaccurate, and to request the completion of information you believe is incomplete.

The right to erasure – You have the right to request erasure of your Personal Data under certain conditions such as when processing of Personal Data is no longer needed or when you withdraw your consent or object to the processing of your Personal Data and no overriding legitimate reasons apply.

The right to restrict processing – You have the right to request restriction on the processing of your Personal Data under certain conditions such as when processing of Personal Data is no longer needed or when you withdraw your consent or object to the processing of your Personal Data and no overriding legitimate reasons apply.

The right to object to processing – You have the right to object to the processing of your Personal Data under certain conditions such as would not override any legitimate reason for continued processing of your Personal Data.

The right to data portability – You have the right to request the transmission of your Personal Data that we have collected to another organization, or directly to you, under certain conditions such as your express consent and when technically feasible.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us by email at privacy@onespan.com.

OneSpan Data Protection Officer

In accordance with GDPR regulations, OneSpan has appointed a Data Protection Officer (“DPO”) in the European Union to comply with Article 27 EU GDPR. If you have any questions on OneSpan's processing of your Personal Data or if you elect to exercise your rights as data subject, or if you require a copy of this Privacy Statement in a format conforming to Data Privacy law applicable to you, please contact OneSpan by sending an email to privacy@onespan.com.

OneSpan will respond to questions or concerns within one month.

Complaints to a Data Protection Supervisory Authority

If you are in the EU and you believe that the processing of your Personal Data is in violation of the GDPR, you have the right to complain to the Supervisory Authority: the Belgian Data Protection Authority <https://www.dataprotectionauthority.be/>

GDPR Group Level Compliance

OneSpan has organized its GDPR compliance at group level comprising the following legal entities:

Legal Entity: OneSpan Inc.
Address: 121 West Wacker, Suite 2050, Chicago, Illinois 60601 USA
Authorized Representative: Scott M. Clements
District Court: State of Illinois, USA
Federal Employer Identification Number (FEIN): 36-4169320
E-mail: legal@onespan.com

Legal Entity: OneSpan International GmbH
Address: Postfach, CH-8058 Zurich-Flughafen, Switzerland
Authorized Representative: Scott M Clements
District Court: Bülach
Company Register Number: CHE-113.310.019
Value-Added Tax Number: CH 669 961
E-mail: legal@onespan.com

Legal Entity: OneSpan NV
Address: Romeinsesteenweg 564 C 1853 Grimbergen, Strombeek-Bever, Belgium
Authorized Representative: Scott M. Clements

Company Register Number: HR Brussel 614.444

Value-Added Tax Number: BE 0446.822.877

E-mail: legal@onespan.com

Legal Entity: OneSpan Canada Inc.

Address: 8200 Decarie Blvd, Suite 300 Montreal, QC, H4P 2P5, Canada

Authorized Representative: Scott M. Clements

Company Register Number: 132193715NP0001

E-mail: legal@onespan.com

Legal Entity: OneSpan Japan K.K.

Address: Level 15, The Imperial Hotel Tower 1-1-1 Uchisaiwaicho Chiyoda-ku 100-0011 Tokyo, Japan

Authorized Representative: Scott M. Clements

Company Register Number: 0104-01-085201

E-mail: legal@onespan.com

Legal Entity: OneSpan Asia Pacific Pte. Ltd.

Address: 128 Neil Road, Singapore SG 088858

Authorized Representative: Scott M. Clements

Company Register Number: 200009851R

E-mail: legal@onespan.com

Legal Entity: OneSpan Segurança de Dados Brasil Ltda.

Address: Ave. Bernardino de Campos, 98, 14° andar, sala 11, Bairro Paraíso, CEP 04004-040, Cidade de São Paulo, Estado de São Paulo

Authorized Representative: Scott M. Clements

Company Register Number: 35.221.728.871

E-mail: legal@onespan.com

Legal Entity: OneSpan Australia Pty Ltd

Address: Damiano House Level 12, 503-505 Kent Street, Sydney NSW 2000

Authorized Representative: Scott M. Clements

Company Register Number: ACN 091 768 688

E-mail: legal@onespan.com

Legal Entity: Dealflo Limited

Address: 20 Bedford Square, London UK WC 1B 3HH

Authorized Representative: Scott M. Clements

Company Register Number: 06707232

E-mail: legal@onespan.com

Contact Us

If you have any questions or complaints about this Privacy Statement, please contact us by email at privacy@onespan.com, or via postal mail at:

OneSpan NV

Legal & Compliance

Romeinsesteenweg 564 C 1853 Grimbergen

Strombeek-Bever, Belgium

Revised: July 2019