

ONESPAN TALENT ACQUISITION PRIVACY STATEMENT

I. INTRODUCTION TO THIS PRIVACY STATEMENT

Protection of your personal data is important to OneSpan Inc. and its affiliated entities worldwide (“OneSpan”, “we”, “us” “our”). This OneSpan Talent Acquisition Privacy Statement (“Statement”) describes the data privacy and protection practices of OneSpan in the collection, processing, use, storage, transfer, and disclosure of personal and personally identifiable information (“Personal Data”) from you (the “Applicant”) as such information may be defined under your applicable jurisdiction.

The collection of Personal Data may be via websites that link to or reference this Statement and various other online and offline instances (collectively “Sites”) where personal data is obtained by OneSpan in connection with employment recruitment, including the Careers section of the OneSpan website, where you can find current job openings and career opportunities at OneSpan and where you, the Applicant, can register and apply for open positions with a view to potential employment at OneSpan (“Talent Acquisition”).

Please read this Privacy Statement before you continue browsing the Site, before using the OneSpan applications (including mobile applications) (the “Application”) that display or link to this Privacy Statement or submitting any Personal Data. When you use the Site or an Application or submit Personal Data to OneSpan via the Site or an Application, you will be requested to expressly “opt in” and acknowledge that you have read, understood and agree to be bound by this Privacy Statement.

Please read this Statement before you continue browsing the Site, before using the OneSpan applications (including mobile applications) (the “Application”) that display or link to this Privacy Statement or submitting any Personal Data. This Statement was last updated on the date set forth below. We may update this Statement from time to time to reflect changes to OneSpan’s Personal Data handling practices. We encourage you to review the Privacy Statements on a regular basis and whenever you elect to provide personal information to OneSpan by visiting www.onespan.com/privacy-center You will be notified of material revisions to this Statement electronically or by other means that OneSpan deems reasonably sufficient to reach your attention, such as a prominent post on the Sites.

2. WHAT’S IN SCOPE FOR THIS STATEMENT

This Privacy Statement describes privacy practices of OneSpan specifically for Talent Acquisition in the collection, processing, use, storage, transfer, and disclosure of personal and personally identifiable Personal Data obtained from or about you both online and offline (“Personal Data”). If you disagree with OneSpan’s Privacy Statement, please do not access or use the Site or the Application any longer and do not transfer Personal Data to OneSpan. This Privacy Statement governs OneSpan’s Talent Acquisition collection and use of Personal Data obtained from or about you online or offline (this means when OneSpan receives your Personal Data via third parties or via referrals in the largest sense).

“Data Protection Laws” refers to data protection laws applicable to the processing of Personal Data under this Statement. These Data Protection Laws include, but are not limited to, the General Data Protection Regulation (EU) 2016/679 and other data protection laws as applicable in your jurisdiction. This Statement applies to the extent applicable or not otherwise prohibited in your jurisdiction. OneSpan conducts business globally and may reference regulations in this Statement that may or may not be applicable to your particular use or jurisdiction.

Our Sites may contain links to other websites and services which are outside OneSpan control and are not covered by this Statement. We recommend that you review the privacy statements of these other parties.

3. WHAT INFORMATION DOES ONESPAN PROCESS AS A CONTROLLER?

When you use or interact with the Site, OneSpan will process certain information including Personal Data in the connection with your use of the Site. Some information you provide directly to us, some we obtain by observing you interact with the Sites. Personal Data processed by OneSpan will vary based on the Personal Data you may

elect to provide and what Personal Data is collected passively as you interact with the Site. Personal Data that OneSpan and its sub-processors actively and passively process may include:

- your name, business title, contact details such as telephone, mobile, or fax, email and/or postal address when you: (i) communicate electronically, by telephone, or in writing with any OneSpan employee or representative; (ii) apply or register on the OneSpan Career section of the Site.
- education history, work experience, including whether you have previously worked at OneSpan or whether you have any government sector experience, your CV, resume, information about your citizenship, eligibility to work in the country you are applying to
- if you signed any or accepted any agreement or are you otherwise subject to any restriction with your current or former employers.
- contact information, preferences, job qualifications and jobs for which you would like to submit an application
- additional information provided by the Application, such as a CV, resume, or transcripts; employment references and related information you may elect to send;
- compensation requests;
- 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, and
- 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.
- passive Personal Data about your device and usage of the Sites;
- unique IDs such as a cookie ID on your browser or geolocation data as well as information about your device, usage, mobile applications, websites or emails through cookies, web beacons, log files or other technologies, which may qualify as Personal Data;
- certain information from the browser you use, such as your IP address, device identifier, location data, browser type and language, access times, the Uniform Resource Locator (URL) of the website that referred you to our website and the URL to which you browse away from our site if you click on a link on our site.
- OneSpan and third-party service providers of analytics and tracking technologies may gather Personal Data and other information using passive data collection techniques such as web beacons, tags, various types of cookies and other tools (“Cookie Technologies”) that provide OneSpan with Site activity data reflecting how you enter, navigate, and leave the Site pages you visit, the frequency of your visit and length of stay on any part of the Sites.

To the extent not prohibited by applicable law, we may be legally obligated to ask you to disclose your race, ethnicity, disability, gender, religion, nationality, and citizenship for regulatory reporting purposes. This data is subject to legal limits on the timing of collection and other applicable terms.

Where otherwise not prohibited by applicable law, for statistical use in the context of the OneSpan Diversity and Inclusion program OneSpan may ask you to disclose your gender. Diversity and inclusion in employment is important as OneSpan seeks to develop and support a diverse workplace and leverage the effects of diversity.

In addition, OneSpan may collect information from third parties (for example recruitment agencies, referrals, career platforms such as Indeed, Glassdoor, professionally oriented social media LinkedIn Recruitment Tool and Talent Solutions)in connection with a background or employment check and/or an employment reference, to the extent not permitted under applicable law.

4. HOW DOES ONESPAN USE THE PERSONAL DATA WE COLLECT?

This Personal Data provided will be used for recruitment purposes as well as to assist in determining eligibility and suitability for employment as follows:

- to recruit suitable employees for the operation and growth of OneSpan business;
- to populate its recruitment tool and manage all collected Applicant Personal Data in such recruitment tool
- to manage support and evaluate our recruitment process;
- process online applications for job vacancies and spontaneous job applications;
- to establish a pool of applicants which may be contacted in the future for potential employment opportunities;
- to send communications, including promotional communications regarding job opportunities, surveys or events;

- to perform pre-employment verification checks. OneSpan conducts these checks to ensure hire eligibility and to comply with local legislation for employment. The content of pre-employment verification checks may vary by country to comply with local legal requirements;
- where not prohibited by law, criminal record information may be processed with your prior consent and where an offer of employment has been made. As applicable, you will receive more information about the nature of the pre-employment verification checks before they are undertaken.

5. WHAT IS OUR BASIS FOR PROCESSING INFORMATION ABOUT YOU?

Where jurisdictions require a legal basis for the collection of Personal Data, OneSpan will collect and process your Personal Data on one or more of the following bases:

- Consent– when you give your explicit consent on our Site or when entering an application, for example when you upload or send OneSpan any Personal Data or a candidate’s personal Data for consideration by OneSpan.
- Compliance with a legal obligation – OneSpan may be required by law to process the Personal Data for a legally defined purpose.
- Legitimate interests –OneSpan may process Personal Data without your explicit consent if OneSpan has a genuine and legitimate business reason unless this is outweighed by harm to your rights and interests. For Talent Acquisition OneSpan’s legitimate interests are the solicitation, evaluation, and selection of applicants for employment and progress their application

OneSpan commits to use all Personal Data only in a fair and lawful manner, in accordance with applicable Data Protection Laws for both collection and processing.

6. HOW WE SHARE PERSONAL DATA FOR BUSINESS PURPOSES

OneSpan may share your Personal Data to other companies within the OneSpan group if required for the purposes described in this Statement. This may involve the transfer of your Personal Data to countries outside your home country or region, including outside the European Economic Area if that is your region, which may have a different level of data protection from your home country. In order to provide adequate protection for the transfer of your Personal Data, where appropriate, we have in place contractual arrangements (such as the European Commission’s Standard Contractual Clauses as appropriate) with our parent company and affiliates in respect of such transfers.

OneSpan does not sell or allow your Personal Data to be used by third parties for their own direct marketing purposes. When OneSpan disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Data confidential and not use it for any purpose except performing the contract. When third parties are given access to Personal Data, in order to provide adequate protection for the transfer of your Personal Data, where appropriate, we have in place contractual arrangements including a data processing agreement or model contractual clauses as required in the applicable jurisdiction.

OneSpan may share Personal Data to provide the Site to users as described below:

- Applicant Personal Data will be available to see OneSpan recruiters from the various countries where OneSpan is active.
- Third-party service providers (for example, integrated technology partners who provide customer support, data analytics, information technology and related infrastructure provision, managed service providers, auditing, other similar service providers,) for those service providers to perform business functions on behalf of OneSpan;
- In individual instances, with professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in countries in which we operate (see list of relevant countries at www.onespan.com/privacy-center) who provide consultancy, banking, legal, insurance and accounting services, and to the extent we are legally obliged to share or have a legitimate interest in sharing your Personal Data;
- Relevant third parties in the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings);

- As required by law, such as to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to government requests, including public and government authorities outside your country of residence, for national security and/or law enforcement purposes, provided if not otherwise prohibited, for third party notices specific to you, we notify you first and cooperate with you in any response to such third parties.
- We may also elect to share anonymous usage data with OneSpan third parties, sub-processors and service providers for the purpose of helping OneSpan in such analysis and improvements. Additionally, OneSpan may share such anonymous usage data on an aggregate basis in the normal course of operating our business; for example, we may share information publicly to show trends about OneSpan recruitment and hiring.
- We might also share data with third parties where the data has and has been de-identified or aggregated in a way so it cannot be used to identify you or your end users.

The table below shows the third-party processor that OneSpan employs for Talent Acquisition, with links to the respective Privacy Policies and Opt-out/Preferences Settings.

The Applicant consents to the use of the following (sub)processors:

Company	Address	Services	Privacy Statement	Location of Data
Greenhouse	https://www.greenhouse.io/	Talent Acquisition software and Applicant Tracking System	https://www.greenhouse.io/gdpr	EU

7. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

OneSpan will retain Applicant Personal Data only for as long as necessary to fulfill the purposes for which it was collected or as permitted by applicable laws or regulations:

- Applicant Personal Data will be retained by OneSpan during the recruitment and selection process, as long as necessary to evaluate Applicant's application for employment at OneSpan.
- When you submit Personal Data in a resumé or similar document to express your interest in career opportunities at OneSpan, your Personal Data will form part of the OneSpan pool of Applicants allowing OneSpan to consider you for available positions that match your qualifications.

8. USER PROFILE, PREFERENCES, AND OPT-OUT

To indicate your interest in employment at OneSpan and access the Site, OneSpan may require you to create a user account and maintain a user profile in its recruitment tool. To the extent it is not contrary to any legal requirements or to a legitimate interest of OneSpan, OneSpan will delete your Personal Data and your profile in the Recruitment Tool, as applicable, when inform OneSpan that you do not wish OneSpan to process your Personal Data or that you do not wish that your personal data remain in OneSpan's pool of Applicants any longer, by contacting privacy@onespan.com and 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. Withdrawal of your consent to the processing of your Personal Data may render OneSpan unable to continue to provide access to the Site. If you withdraw your consent, it will not affect the lawfulness of any processing based on your consent before you withdrew it.

9. ACCESS, CORRECTION, AND DELETION OF PERSONAL DATA

You may request OneSpan modify, delete or restrict processing of your Personal Data by contacting us at privacy@onespan.com. 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. After expiry of the applicable retention periods, your Personal Data will be deleted. If there is any Personal Data that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to restrict access and use of such Personal Data as required by applicable law.

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.

10. RIGHTS TO YOUR PERSONAL DATA; EXERCISING YOUR RIGHTS

You have certain rights relating to your Personal Data, subject to local data protection laws. Depending on the applicable laws in your jurisdiction, including if you are located within the European Economic Area, these rights may include:

- to access the Personal Data held by OneSpan;
- to rectify inaccurate Personal Data and, accounting for the purpose of processing the Personal Data, ensure it is complete;
- to delete your Personal Data;
- to restrict our processing of your Personal Data;
- to transfer your Personal Data to another controller;
- to object to any processing of your Personal Data carried out on the basis of our legitimate interests.
- to not be subject to a decision based solely on automated processing, including profiling, which produces legal effects; and
- to the extent we base the collection, processing and sharing of your Personal Data on your consent, to withdraw your consent at any time, without affecting the lawfulness of the processing based on such consent before its withdrawal.

11. International transfer of Personal Data

OneSpan conducts business throughout the world and Personal Data is processed globally. Personal Data may be transferred, accessed, and stored at global facilities of service providers engaged by OneSpan, as necessary for the reasonable conduct of OneSpan's business operations and activities, when the transfer is legally permissible and appropriate for the purposes described in this Statement. Your Personal Information may be provided to countries outside your home country or region, including outside the European Economic Area if that is your region, which may have a different level of data protection from your home country. In order to provide adequate protection for the transfer of your Personal Information, where appropriate, we have in place contractual arrangements (such as the European Commission's Standard Contractual Clauses as appropriate) with our parent company, sub-processors or service providers in respect of such transfers. By using the Site and/or providing Personal Data to OneSpan, you consent to the transfer of Personal Data across OneSpan's subsidiaries, sub-processors or service providers in countries outside of your country of residence and other locations which may have different data protection regulations than those of your country.

12. HOW IS YOUR PERSONAL INFORMATION SECURED?

Pursuant to applicable Data Protection 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, include, but are not limited to, regular vulnerability scanning, security testing, and periodic deployment of security patches.

13. 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 Statement apply to this Site and the specified activities. Please review the privacy policies of any other linked websites that you access through the Site. OneSpan is not responsible or liable for the content of third-party websites or for third-party compliance with applicable laws and regulations.

14. COLLECTION AND USE OF CHILDREN’S PERSONAL INFORMATION

OneSpan does not direct or promote the Sites to persons under eighteen years old nor does OneSpan knowingly solicit or collect Personal Data from persons under 18. If you are a child, as defined by laws of your country, please do not submit any Personal Data through our Sites without the express consent and participation of a parent or guardian.

15. HOW ONESPAN USES COOKIE TYPE TECHNOLOGIES

OneSpan and third-party service providers of tracking technologies gather 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, the frequency of your visit and length of stay on any part of the Site.

Cookies are small and sometimes encrypted text files sent from the Site to your browser or hard drive that store bits of Personal Data about you and your use of the Site. Cookies allow OneSpan to assist with the downloading or uploading of documents and other materials from and to the Site, 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. You may review OneSpan’s [Cookie Policy](#) describing OneSpan’s use of cookies in more detail.

Use of data collected with cookies and remarketing tags is governed by this 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. 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.

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.

OneSpan and its third party service providers may gather Personal Data using passive data collection technical 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 while using the Sites. Cookie Technologies are used to remember Site preferences, device usage data, manage your activity across devices, analyze site traffic, and various other activities. Depending on the settings you have selected, your browser adds the text to your device as a small file. You can accept or decline cookies as you prefer. The Help portion of your web browser, most likely found on the toolbar, can assist you with setting or modifying your Cookie Technology settings. Note that disabling or declining cookies may prevent the use of certain features of our Sites, including the ability to login to a site. Use of data collected with cookies and remarketing tags is governed by this Statement as to OneSpan's use, and by the respective service providers' Privacy Policies as to their data use.

16. CONTACTING ONESPAN

If you believe that Personal Data has been used in a way inconsistent with this Statement, or if you have further questions, comments or suggestions related to OneSpan's handling of Personal Data, please contact OneSpan by emailing privacy@onespan.com. In addition, you may have the right to communicate any concerns to the regulatory authority in your jurisdiction.

Written inquiries may be addressed to:

OneSpan North America, Inc.
Legal Department
121 West Wacker, Ste 2050
Chicago, IL 60601

For Data Subjects located in the EU, written inquiries to the EU Data Protection Officer may be emailed to Privacy@onespan.com or addressed to:

Data Protection Officer
OneSpan NV
Romeinsesteenweg 564 C
Strombeek-Bever, 1853, Belgium

This Talent Acquisition Privacy Statement was last updated on June 2020.