

ONESPAN PRODUCT PRIVACY STATEMENT

I. INTRODUCTION TO THIS PRIVACY STATEMENT

Protection of our customer's personal data is important to OneSpan Inc. and its affiliated entities worldwide ("OneSpan", "we", "us" "our"). This Product Privacy Statement (the "Statement") applies to OneSpan Products that link to or reference this Statement and describes the data privacy and protection practices of OneSpan in the collection, processing, use, storage, transfer, and disclosure of personal and personally identifiable information in connection with its Products as such information may be defined under your applicable jurisdiction ("Personal Data"). Although the specifics of what may constitute Personal Data and the related obligations, restrictions and rights may vary by country or region, this Statement applies to the extent applicable or not otherwise prohibited in your jurisdiction. This Statement applies to all OneSpan affiliated entities noting that your contractual relationship is with the particular OneSpan affiliate from which you purchase the Products and have access via a trial or evaluation period.

Products collectively refers to software and technology made available in an on premises or cloud model, mobile applications, hardware devices, fulfilment services, maintenance or support services, or any other product, software or service type that links to this Statement.

"Customer" or "you" means any entity who enters into a contract with OneSpan and/or its affiliated entities to access or use the Products and through whom the end user of such Products are provided access to the Products.

This Statement was last updated on the date set forth below. It may be modified over time to comply with legal requirements or to meet changing business needs, for example the addition of new features, functionality or Products. If we want to update you on an important change, we will communicate with you via a general notice on our website, a pop-up notice or some other appropriate method.

2. WHAT'S IN SCOPE FOR THIS STATEMENT

This Statement applies to the processing of Personal Data (1) in connection with the administration of Customer's business relationship with OneSpan and (2) the provision of the Products to Customer and its end users. OneSpan conducts business globally and may reference regulations in this Statement that may or may not be applicable to your particular use or jurisdiction.

Personal Data processed by OneSpan when you interact with OneSpan through its corporate website by downloading a whitepaper, subscribing to a newsletter, white paper or other marketing material, attending a webinar or tradeshow event, visiting our branded social media pages and other direct marketing interactions are subject to the terms of the OneSpan Privacy Statement available at OneSpan's [Privacy Center](#). Although the OneSpan Privacy Statement applies to various portals within the corporate website, where Customer elects to participate in a product demonstration certain Personal Data may be shared with Sub-Processors as described in this Statement.

Our Products 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. OneSpan is not responsible for the content, security or privacy practices employed by other products or sites or third parties, even if links to their websites are present in our Products.

Customers are responsible for their own personal information collection, data processing and retention practices in their use of the OneSpan Products. Customer may, in its use of the Product, submit Personal Data to OneSpan. Customer has sole responsibility for the accuracy, quality, and legality of Personal Data and the means by which Customer or any relevant third-party acquired Personal Data. Customer agrees to not process, transmit or store within the Products any prohibited Personal Data or Personal Data for which it does not have the required legal basis to process.

This Statement does not apply to specific applications, products and services of our Customers running on our platforms; products and services sold by our Customer, electronic communications sent by our Customers to other

individuals; or personal data otherwise collected, used, shared or processed by our Customer via our Products. If you are an end user of a Customer consult the privacy statement of the Customer for information regarding such Customer's collection, processing and retention practices of personal information.

3. WHAT INFORMATION DOES ONESPAN PROCESS?

When you enter into an agreement for the Products, OneSpan will process certain information including Personal Data in the administration of the business relationship and the provision of the Products. Some information you provide directly to us, some we obtain by observing how our Customers and their end users interact with our Products. Personal Data processed by OneSpan will vary based on (1) how the Customer elects to configure and implement the Products and (2) what personal data Customer elects to process as controller.

Information OneSpan and its sub-processors/service providers process actively and passively may include:

- Business contact information, user name and password, transactional data, including Products ordered, financial details and payment methods, usage data for billing, and your consent to OneSpan's processing of your Personal Data if applicable.
- Unique IDs such as a cookie ID on your browser, biometric data 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;
- Product usage information. Behavioral and biometric usage, usage information including the pages viewed, content clicked, search terms used, the configuration of Customer and their end users computers, mobile devices, applications and performance metrics related thereto and other actions you take in connection with the use of the Products. We may also collect 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 Product activity data reflecting how you enter, navigate, and leave the Product pages you visit, the frequency of your visit and length of stay on any part of the Product or third-party websites, application or device usage data, and your Product preference indicated by the number of times and the length of time you view, use or access a Product. You can obtain additional information about passive data collection tools here.

If Customer's use of the Products requires OneSpan to process Personal Data falling within the scope of the EU General Data Protection Regulations or the California Consumer Protection Act, the OneSpan Data Processing Addendum is available for e-signature at OneSpan's [Privacy Center](#).

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

We use the information in the operation of OneSpan's business and in facilitating delivery of OneSpan Products both online and offline, such as:

- For account creation, performance and management pursuant to a contract between Customer and OneSpan as well as to perform accounting, auditing, billing, reconciliation, collection, compliance and enforcement activities and to communicate with you regarding Products, your order status, update your account information, to collaborate, integrate and liaise with third party service providers, suppliers and business partners as needed to provide the Products;
- To provide access to or deliver the Products, use and monitoring of the Products and associated resources and to administer, configure, test, maintain, support, develop personalize, analyze and improve our Products and technologies and to perform data analysis for product, service and/or privacy enhancements;
- To enhance security and to investigate and protect OneSpan, its customers and their end users from fraud or other inappropriate conduct and deter fraudulent, unauthorized, or illegal activity
- Provide other functions or serve other purposes, as disclosed to you at the point of collection or such other time or as required or permitted by law.

- To comply with applicable laws, court orders and regulations, to protect the rights, property or safety of OneSpan, our customers, end users, employees or others;
- Link or combine information about you with other personal information we get from third parties, to provide the Products, perform under our contract with you and provide our Customers with better and more personalized products.
- To communicate news and updates on OneSpan Products, industry events, promotions, upcoming events, and news about Products we offer or may be of interest to you, important Product notices including those announcing changes to our terms or policies, promotional offers and surveys. You may opt-out of receiving emails regarding OneSpan events and other Products by visiting the OneSpan [Preference Center](#), however, you will continue to receive notices regarding OneSpan Products you've purchased, and other communication related to your account.
- Certain OneSpan Products employ masking of certain identifiers related to Personal Data that you or a Customer submits or will submit to OneSpan in the process of using the Products. When associated with a OneSpan Products, Personal Data de-identification such as by anonymization, pseudonymization, and encryption is performed by or for and on behalf of a Customer.
- OneSpan employs anonymization techniques and pseudonymization methods on sets or subsets of Personal Data identifiers as part of OneSpan's privacy by design strategy, risk minimization, and data minimization strategy. Data rendered anonymous, aggregated data and statistical information, and data not attributable to an individual after pseudonymization or encryption using OneSpan proprietary applications or third-party tools are or may be used and shared in the context of analytics, testing, product, development, service provisioning, business development or for such other purpose that OneSpan deems appropriate subject to applicable law. OneSpan will not reidentify deidentified or anonymized data.
- If OneSpan is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our website any change in ownership or uses of your Personal Data, as well as any choices you may have regarding your Personal Data.
- To assist Customer in complying with its controller obligations under applicable data protection law relevant to your use of the Products and to inform Customer if, in our reasonable opinion, Customer's written instruction infringes applicable data protection law.

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

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

- Your consent, for example where we have obtained your consent to process your Personal Data as described in this Statement. You are free to withdraw your consent at any time by first contacting the business entity who directly collected your information or by contacting Privacy@OneSpan.com. Withdrawal of your consent of processing may render OneSpan unable to continue to provide the Products. If you withdraw your consent, it will not affect the lawfulness of any processing based on your consent before you withdrew it.
- Where Customer has provided OneSpan with special categories of Personal Data and represents to OneSpan it has obtained the end users consent or satisfies some other permitted criteria for use.
- To comply with a contractual obligation and the performance of the contract.
- For compliance with OneSpan's legal obligations where other laws require the processing of your Personal Data for example, health and safety, taxation, anti-money laundering laws, anti-corruption laws) or where we need your Personal Data to protect your vital interests or those of another person.
- In order to communicate adequately with you and to respond to your requests, we need to process information about you and therefore have a legitimate interest in processing this information.
- We rely on our legitimate interest to analyze, develop, improve and optimize our Products, and to maintain the security of our sites, networks and systems.
- OneSpan and its service providers, suppliers and Sub-processor legitimate interests which include the provision of the applicable Products.

6. HOW WE SHARE PERSONAL DATA FOR BUSINESS PURPOSES

OneSpan may transfer your Personal Data to other companies within the OneSpan group or our sub-processors 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. Such countries may include, without limitation, the United States and other countries in which OneSpan or its sub-processors maintain facilities. 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. For a list of current sub-processors for OneSpan Products see the OneSpan [Privacy Center](#).

OneSpan does not sell or allow your Personal Data to be used by third parties for their own direct marketing purposes. When OneSpan discloses Personal Data 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, we have in place contractual arrangements which may include a data processing agreement, model contractual clauses or other contractual arrangements as required in the applicable jurisdiction.

OneSpan may share Personal Data to provide the Products to Customers and end users as described below:

- Third-party service providers (for example, integrated technology partners who provide Products, customer support, data analytics, order fulfilment, analytics, information technology and related infrastructure provisioning, 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 the OneSpan [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, 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 will notify you first and cooperate with you in any response to such third parties.
- We may also 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 the general use of our Products.
- We might also share data with third parties if the data has been de-identified, anonymized or pseudomized or aggregated in a way so it cannot be used to identify Customer or your end users.
- Any Personal Data or other information you choose to submit in communities, forums, blogs or chat rooms on our websites regarding our Products may be read, collected and used by others who visit these forums, depending on your account settings. In some cases, such content may be publicly available on the Internet. You should carefully consider whether you wish to submit Personal Data to these forums or social networks and whether you wish to make your profile available to other users, and you should tailor any content you may submit accordingly.
- If you use our Products as an authorized end user of a Customer, we may share Personal Data with the Customer responsible for your access to the Products;

- OneSpan may refer to the Company that you represent in presentations, marketing activities, investor meetings and government filings. With the Customer's prior consent, OneSpan may issue a press release relating to Customer's status as a customer of OneSpan.

7. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We may retain your Personal Data for a period of time consistent with the original purpose of collection. We determine the appropriate retention period for Personal Data based on the terms of your agreement, as well as on the basis of applicable legal requirements (such as applicable statutes of limitation). 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.

8. INTERNATIONAL TRANSFER OF PERSONAL DATA

OneSpan operates worldwide and Personal Data is processed globally. 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, but not limited to, the European Commission's Standard Contractual Clauses as appropriate) with OneSpan and its affiliates and sub-processors in respect of such transfers. If Personal Data is transferred to a OneSpan recipient in a country that does not provide an adequate level of protection, we will confirm that the recipient of your Personal Data offers an adequate level of protection, for instance by entering into the appropriate agreements and, if required, standard contractual clauses for the transfer of data as approved by the European Commission or such other applicable jurisdiction. Data you submit to the Service is automatically stored on servers that OneSpan hosts for the Service and in data centers of third parties located in various countries if not otherwise provided in the contract. With regard to certain SMS functionality and similar Products, transfers may be made in connection with routing your communications in the most efficient way.

9. HOW IS YOUR PERSONAL DATA SECURED?

OneSpan has implemented appropriate technical, physical and organizational measures designed to protect Personal Data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorized disclosure or access, as well as all other forms of unlawful processing. Products agreements may include a description of specific technical, physical and organizational measures applicable to certain Products. Access to Personal Data is strictly limited to our employees and trusted partners including Sub-processor, third parties and service providers who have a need to access Personal Data in the course of assisting OneSpan in the performance of the contract.

10. RESPONDING TO THIRD PARTY REQUESTS

As between OneSpan and its Customers, each Customer is the controller of its end users Personal Data. Customer end users should direct any requests related to their Personal Data to Customer. To the extent such access is not available to Customer, OneSpan will provide reasonable assistance with requests from individuals to access, delete or erase, restrict, rectify, receive and transmit, block access to or object to processing of Personal Data. If OneSpan is contacted by a Customer end user, we may refer your request to the OneSpan customer prior to taking any action.

11. DO NOT TRACK SIGNALS

Please note that while you may have the opportunity to opt-out of targeted advertising through the OneSpan Preference Center and you may be able to control the use of cookies through your web browser as described in the "How OneSpan Uses Cookies Technologies" section in this Statement, some web browsers may also give you the ability to enable a "do not track" setting. This "do not track" signal is different from disabling certain forms of tracking by declining cookies in your browser settings, as browsers with the "do not track" setting enabled still can accept cookies. OneSpan does not respond to web browser "do not track" signals currently.

12. COLLECTION AND USE OF CHILDREN'S PERSONAL DATA

We do not knowingly collect Personal Data from children through our Products. If you are a child as understood by laws of your country, please do not submit any Personal Data through our Product without the express consent and participation of a parent or guardian.

13. HOW ONESPAN USES COOKIE TECHNOLOGIES

OneSpan and its third party service providers may gather Personal Data using passive data collection techniques such as cookies, web beacons, tags, and other tools that provide OneSpan with Product activity data reflecting how you enter, navigate, and leave the pages you visit while using the Products. Cookie Technologies are used to remember Product 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 Products, 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.

14. RIGHTS RELATING TO YOUR PERSONAL DATA

Customers and end users have certain rights relating to your Personal Data, subject to local data protection laws. Depending on the applicable laws 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.

15. MAKING REQUESTS; EXERCISING YOUR RIGHTS

To exercise your rights with respect to Personal Data processed by OneSpan on behalf of a Customer with which you have entered into a business relationship or transaction, please contact that Customer directly. If you wish to access, modify, update, or delete all or part of your Personal Data or exercise any other right in your jurisdiction, contact OneSpan as described in the 'Contacting OneSpan' section below. OneSpan will make every reasonable effort to promptly comply with your request as required under applicable law. 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 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 in accordance with applicable law. To exercise your rights in connection with Personal Data processed by OneSpan on its own behalf, please contact us by using the information in the "Contacting OneSpan" section, below.

16. CONTACTING ONESPAN

We make every effort to handle your personal data in a careful and legitimate manner in accordance with the applicable regulations. Nevertheless, if you believe that your rights have been violated and if you do not find an answer to your concerns with OneSpan, you are free to contact:

Commission for the Protection of Privacy

Rue du Prince 35, 1000 Brussels
Tel. 02 274 48 00
Fax. 02 274 48 35
E-mail: commission@privacycommission.be

Another appropriate supervisory authority may be competent to handle a complaint regarding a purported violation of a GDPR provision by OneSpan if the subject matter relates solely to a OneSpan entity in that member state or substantially affects data subjects only in that member state.

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.

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 OneSpan 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 Privacy Statement was last updated on July 2020.