

## ONESPAN PRIVACY STATEMENT

## 1. 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 Privacy Statement ("Statement") applies where OneSpan acts as a "controller i.e. determines the purposes and means of the processing of personal data for its own internal business purposes and 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. This Statement describes the data privacy and protection practices of OneSpan as a controller in the collection, processing, use, storage, transfer, and disclosure of personal information and personally identifiable information ("Personal Data") as such information may be defined under your applicable jurisdiction.

"Data Protection Laws" means I) the U.S. Data Protection Laws, 2) the GDPR and the laws of non-EU EEA countries that have formally adopted the GDPR, 3) the Brazilian Data Protection Law (LGPD), Lei General de Proteção de Dados Pessoais, or 4 under any other data protection laws applicable to OneSpan's Processing of Personal Data.

"GDPR" means the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, (General Data Protection Regulation

"U.S. Data Protection Laws" means all laws and regulations of the United States of America, including the California Consumer Privacy Act (CCPA), applicable to the processing of Personal Data. 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.

Please read this Statement and the Terms of Use before you continue browsing the Sites. If you disagree with OneSpan's privacy practices, please do not access or use the Sites or participate in other online and offline interactions and do not transfer Personal Data to OneSpan. Un By accessing or otherwise using the Sites, you indicate that you have read this Statement and consent to its terms, unless such form of consent is prohibited in your jurisdiction.

This Statement was last updated on the date set forth below. We may update OneSpan's Privacy Statement from time to reflect changes to OneSpan's processing of Personal Data. We encourage you to review the Privacy Statement on a regular basis and whenever you elect to provide personal information to OneSpan by visiting <a href="https://www.onespan.com/privacy-center">https://www.onespan.com/privacy-center</a> 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 or the OneSpan Privacy Center.

#### 2. WHAT'S IN SCOPE FOR THIS STATEMENT

This Statement applies to Personal Data processed by OneSpan as a controller for its own internal business processes when you interact with OneSpan online, onsite or offsite, via our corporate website, amongst others, 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. OneSpan may collect Personal Data directly from yourself, via public sources or social media or from third parties. 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.

Personal Data processed in connection with a customer's use of OneSpan products and services are subject to a separate Product Privacy Statement available at the <u>Privacy Center</u>.



### 3. WHAT INFORMATION DOES ONESPAN PROCESS AS A CONTROLLER?

When you use or interact with the Sites, OneSpan will process certain information including Personal Data in the connection with your use of the Sites. Some information you provide directly to us, some we obtain by observing you interact with the Sites and some we obtain from public sources or from third parties. Personal Data processed by OneSpan will vary based on the Sites you interact with, the Personal Data you may elect to provide and what Personal Data is collected passively as you interact with the Sites.

Personal Data that OneSpan and its sub-processors actively and passively process may include:

- o your name, professional information, such as business title and/or occupation, salutation, contact details such astelephone, 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) apply or register for or attend any training, certification program, or event, webinar, or contest involving a OneSpan product, service, or promotional activity; (iii) subscribe to the OneSpan newsletter or download Site content; (iv) register for an online community that we host;
- o biometric data, images, sound or recordings or other Personal Data that you elect to submit to us for demonstration, testing, proof of concept or other agreed purposes;
- o your consent to OneSpan's processing of your Personal Data if applicable;
- o 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 Sites;
- o registration for an online community that we host such as the OneSpan community portal, developer portal, partner portal, support portal or similar communities;
- o 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;
- o 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 ourwebsite and the URL to which you browse away from our site if you click on a link on our site.
- o 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 refer to the <u>Privacy Center</u> for the Talent Acquisition Privacy Statement.
- 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.
- Certain Personal Data arising from SSL decryption of corporate firewalls such as first name, last name/surname, email address, phone number date of birth or any data submitted to the website.

## 4. PARTICIPATION IN COMMUNITY FORUMS OR PORTALS

When you participate in community type forums or portals, such as the Partner Portal, on the Site which allows users to post messages for public comment and response or use the functionality of the portal, you are solely responsibility for the 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 in OneSpan forums or portals. OneSpan has no control over Personal Data and content that users share and publish in community Forums or portals. 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 or portal 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.

#### 5. HOW DOES ONESPAN USE THE PERSONAL DATA WE COLLECT?

OneSpan does not rent or sell your Personal Data to any third party. We use the information in the operation of OneSpan's business and website:

- (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 and OneSpan;
  - to allow access and use of the Site, including the portals, such as the developer portal, customer portal, partner portal, online training services and similar Sites. With regard to demonstration experiences available via a portal, refer to the Product Privacy Policy for information regarding Personal Data which may shared with third parties in connection with performing a demonstration;
  - to provide OneSpan products, services, updating/patching, maintenance, support, troubleshooting, reporting, logging, 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 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 and any apps and tools in our systems
  - to enhance security, and to protect OneSpan from fraud or other inappropriate conduct.
  - 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 and to operate our business;
- (2) in facilitating delivery of OneSpan information, such as:
  - to communicate with you and other users of the Sites, 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:
  - to tailor marketing to users' and subscribers' needs; remarket and advertise to previous Site users;
  - to customize, measure, and enhance effectivity of promotional events and communications to customers;
  - to track marketing campaign results and responses.
  - link or combine information about you with other personal information we get from third parties, to provide the Sites, 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, promotional offers and surveys. You may opt-out of receiving emails regarding OneSpan events and various products by visiting our <a href="Preference Center">Preference Center</a>, however, you will continue to receive notices regarding OneSpan products you've purchased, and other communication related to your account.
  - OneSpan may disclose and transfer Personal Data to a third party in relation to any merger and acquisition or other similar activities.
  - OneSpan collects Personal Data offline (1) to respond to requests or to perform a required activity; (2) to communicate news and updates on OneSpan products and services; (3) to enhance OneSpan's business programs and the relevance of OneSpan's marketing activities, product and service offerings; (4) to create



or perform a contract; (5) if you attend an event, we may, with your further consent, scan your attendee badge, which will provide to us your information, such as name, title, company name, address, country, phone number and email address;

For SSL decryption of corporate firewalls to visualize and analyze, for monitoring purposes only, the encrypted traffic and screen for malicious data (viruses, spyware and malware) to prevent download

## 6. 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:

- when you give your explicit consent, such as when you apply for a job, create a user account, subscribe toa newsletter, access any OneSpan webcast, forum, information or materials from the Site; when you visit our branded social media pages; use or access OneSpan services;
- o 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 wherewe need your Personal Data to protect your vital interests or those of another person.
- o to communicate adequately with you and to respond to your requests, we need to process informationabout you and therefore have a legitimate interest in processing this information.
- we rely on our legitimate interest to analyze, develop, improve and optimize our sites, products andservices, 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, provided always that our legitimate interests are not outweighed byany prejudice or harm your rights and freedoms.
- 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 theperson or
  entity you represent, as well as for billing, reporting, or other legitimate business purposes.
- Compliance with a legal obligation where OneSpan is required by law to process Personal Data for a particular purpose.
- Legitimate interest where a Site user or you are a customer or a representative of the customer or in case of marketing actions for which OneSpan has a legitimate interest, OneSpanmay process Personal Data obtained directly from you, via public sources or from third parties without your explicit consent if OneSpan has a genuine and legitimate reason, unless outweighed by harm to your rights and interests.

#### 7. 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 or other purposes. When OneSpan discloses personal information for a business purpose, we enter into a contract with our contractual parties 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 as described below:



- 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 <a href="https://www.onespan.com/privacy-center">https://www.onespan.com/privacy-center</a>) 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 the general use of our Sites.
- We might also share data with third parties where the data has and has not been de-identified or aggregated in a way so it cannot be used to identify you or your end users.
- We might share Personal Data for marketing purposes with event organizers, marketing services providers and we may also receive Personal Data from such services providers for the organization of events, marketing actions or email/blast campaigns provided such services providers have a legal basis to transfer such Personal Data to OneSpan.
- Any Personal Data or other information you choose to submit in communities, forums, blogs or chat roomson 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.

#### 8. HOW LONG DO WE KEEP YOUR PERSONAL DATA

We may retain your Personal Data for a period consistent with the original purpose of collection. We determine the appropriate retention period for Personal Data based on the terms of your usage of the Sites, as well as based on applicable legal requirements (such as applicable legal conservation periods or 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.

# 9. USER PROFILE, PREFERENCES, AND OPT-OUT

To gain full access to certain areas of the Site, 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 opt-out of electronic communications by clicking the unsubscribe or opt-out link in OneSpan's marketing communication. You can control your preferences for using the Site including opting into or out of Personal Data for marketing use and certain programs and interests in your user account at <a href="mailto:Preference Center">Preference Center</a> or by informing OneSpan at <a href="mailto:privacy@onespan.com">privacy@onespan.com</a>.



With your consent, your Personal Data will be added to OneSpan's internal mailing list so we can furnish you with information about our products and services and OneSpan offerings, events, webinars, and other information... via email, telemarketing, fax, SMS, and postal mail, as legally permitted. Also, OneSpan may disclose and transfer Personal Data to OneSpan marketing or other partners or resellers for the marketing of OneSpan products and services. If you no longer want to receive communications from OneSpan, you are free to withdraw your consentat any time via the Preference Center, however please note that withdrawal of your consent of processing Personal Datta may render OneSpan unable to continue to provide access to certain Sites. If you withdraw your consent, it will not affect the lawfulness of any processing based on your consent before you withdrew it. Some OneSpan Sites may require separate user registrations for you to obtain the services offered on those Sites. Certain OneSpan Sites will permit automatic access to other OneSpan Sites so that by logging into one user account, you may automatically be signed in to other OneSpan Sites. Other OneSpan Sites may have different purposes uses, and collection techniques than those indicated in this Statement. Please always review the privacy statement of the OneSpan Site that you access before providing your Personal Data.

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 <a href="https://www.aboutads.info/choices">www.aboutads.info/choices</a>. 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 <a href="Cookie Policy">Cookie Policy</a> 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. A tag is a "web beacon" that appears as a clear graphic image of a IxI 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 Statement as to OneSpan's use, and bythe 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 <a href="https://www.adobe.com">www.adobe.com</a> 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 lawsand regulations.

## 10. 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.

Tools	Purposes	Link to Privacy Policy	Link to Opt-Out and Settings Preferences
Google Ads and DoubleClick	Advertising analyticsand administration.	http://www.google.com/policies /privacy/	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
Google Analytics (including Google Universal Analytics)	Analyzes web traffic across multiple devices and	http://www.google.com/policies /privacy/ http://www.google.co.uk/intl/en/	To set your preferences or opt-out of Google Analytics: https://tools.google.com/dlpage/gaoptout

Universal website tag of Twitter	Conversion analytics involving marketing campaigns	<sub>een</sub> OneSp	Gopt-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 for analytics of user interactions.	https://www.demandbase.com/p rivacy-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	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
LinkedIn Marketing Solutions by LinkedIn	Deploys ads to customers.	https://www.linkedin.com/legal/ privacy-policy	Ad preferences may be adjusted on your LinkedIn account
Visual Web Optimizer by Wingify	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	Analytics involving behavioral advertising.	http://www.marketo.com/trust/l egal/privacy/	
Marketo Munchkin Cookie by Marketo	Email and marketing activity analytics	http://www.marketo.com/trust/l egal/privacy	
Alexa web beacons, cookies, and pixels in Toolbar Service by Amazon	Site analytics with Alexa tools	http://www.alexa.com/help/priv acy	You may disable the Toolbar Service on the Options Menu of your Amazon account
AddThis Tools (cookies and pixels) by AddThis	Collect certain Personal Data from Sites for targeted advertising.	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	Use and site traffic analytics.	http://privacy.aol.com/	To opt-out: http://www.youronlinechoices.com/opt-out-interface
Bing Ads by Microsoft	Site usage data and analytics	https://privacy.microsoft.com/e n-us/privacystatement	To adjust Microsoft ads: https://choice.microsoft.com/en-US/opt-out
Google Optimize	Analyzes web traffic	analytics/privacyoverview.html https://policies.google.com/priva cy?hl=en	To set your preferences or to opt-out: https://policies.google.com/privacy?hl=en#infochoices
Hotjar	User experience analytics	https://www.hotjar.com/legal/po licies/privacy	To opt-out of Hotjar tracking: https://www.hotjar.com/legal/compliance/opt-out
Facebook Tag API and Custom Audience Pixel	andinteraction with Facebook for advertising	https://www.facebook.com/abo ut/privacy/	To adjust Facebook ad settings: https://www.facebook.com/about/ads/
		https://twitter.com/privacy?lang	

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 thetoolbar, 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.

## 11. 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 the:

Data Protection Authority

Drukpersstraat 35, 1000 Brussels

Tel. 02 274 48 00 Fax. 02 274 48 35

E-mail: <a href="mailto:contact@apd-gba.be">contact@apd-gba.be</a>

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 <a href="mailto:privacy@onespan.com">privacy@onespan.com</a>.

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 <a href="mailto:Privacy@onespan.com">Privacy@onespan.com</a> or addressed to:

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

This Privacy Statement was last updated in September 2021.