



OneSpan

The Digital Agreements Security Company

ONESPAN INC. PRODUCT PRIVACY STATEMENT

1. INTRODUCTION TO THIS PRIVACY STATEMENT

Protection of Personal Data is important to OneSpan Inc. and its affiliated entities worldwide. 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 with respect to the collection, processing, use, storage, transfer, and disclosure of Personal Data of Users and End Users on behalf of our Customers when OneSpan provides OneSpan SaaS Services (as defined below) to Customers. For information about our data privacy and protection practices as they relate to our websites, marketing, hiring, or other activities not related to use of our SaaS Services or products, please refer instead to our [Corporate Privacy Statement](#), available on the OneSpan [Privacy Center](#).

Customers and Users (as defined below) are not obliged to disclose Personal Data to OneSpan but should understand that without their consent to the collection and processing of Personal Data by OneSpan, we will be unable to provide them with OneSpan SaaS Services. Customers and Users should also be aware that they are responsible for all Personal Data they provide to us and that we rely on its accuracy. If Personal Data that was provided to us is no longer up to date, Customers and Users should inform us immediately.

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 a particular jurisdiction. This Statement applies to all OneSpan affiliated entities; however, if you are a OneSpan Customer who purchased OneSpan products or evaluated them on a trial basis, your contractual relationship is with the OneSpan affiliate you contracted with.

This Statement was last updated on the date set forth on the last page of this document. It may be modified over time to comply with legal requirements or to meet changing business needs, which may include the addition of new features, functionality, data processing activities, services or products. We encourage you to review this Statement on a regular basis and whenever you elect to provide personal information to OneSpan by visiting <https://www.onespan.com/privacy-center> (“[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 or the Privacy Center.

2. KEY TERMS USED IN THIS PRIVACY STATEMENT

Capitalized terms and definitions used but not defined in this Statement have the

meaning given to them in the [OneSpan Master Terms](#) governing the SaaS Services, unless another definition is explicitly provided for specifically for the context of this Statement.

"Applicable Data Protection Laws" means Data Protection Laws that apply in a particular jurisdiction and/or to a particular type of data or use of data.

"Cookie Technologies" means passive data collection techniques such as web beacons, tags, various types of cookies and other tools, as further described in OneSpan's [Cookie Statement](#).

"Customer" means any entity who enters into a contract with OneSpan to access or use the SaaS Services.

"Data Protection Laws" means 1) the U.S. Data Protection Laws, 2) the GDPR and the laws of non-EU EEA countries that have formally adopted the GDPR, 3) Brazil's Lei General de Proteção de Dados Pessoais or 4) any other data protection laws applicable to OneSpan's Processing of Personal Data.

"EEA" means the European Economic Area.

"EU" means the European Union.

"End User" means any person who accesses the SaaS Services as an end user via a Customer (for example a customer or prospective customer of a bank that contracts with OneSpan to use SaaS Services).

"OneSpan", "we", "us", or "our" means OneSpan Inc. and its affiliated entities worldwide.

"Personal Data" means personal information and personally identifiable information, as such information may be defined under Applicable Data Protection Laws.

"Privacy Center" means the OneSpan website available at <https://www.onespan.com/privacy-center> or an equivalent successor OneSpan website.

"SaaS Services" collectively refers to software and technology made available by OneSpan in a cloud model and related, maintenance or support services, or any other product, software or service type that links to this Statement.

"Statement" means this Product Privacy Statement.

"User" means any person representing a Customer who accesses the SaaS Services on behalf of that Customer (e.g., an employee of a bank that has a contract with OneSpan for OneSpan SaaS Services).

Information Security

OneSpan recognizes the importance of identifying and protecting the information

assets of the organization, avoiding destruction, improper disclosure, improper modification or unauthorized use of any information relating to our Customers, End Users, Users, job applicants, employees, pricing, strategy, management, or other related concepts. We are therefore committed to developing, implementing, maintaining and continuously improving our information security management system in order to help ensure the confidentiality, availability and integrity of Personal Data and information in general. For additional information about our information security program, please see our Privacy Center.

Error or Vulnerability Reports

Despite the care we take to secure our systems, errors or vulnerabilities may happen. If you believe you have identified an error or a vulnerability, please let us know so we can address it. You can report errors and vulnerabilities to our security department: security@onespan.com

Cookies

Cookie Technologies and controls are described in our [Cookie Statement](#).

3. WHAT'S IN SCOPE FOR THIS STATEMENT

This Statement applies to the processing of Personal Data in connection with (1) the administration of Customer's business relationship with OneSpan under a Contract whereby OneSpan provides SaaS Services (OneSpan as a *controller* of Personal Data) and (2) the provision of the SaaS Services to Customer and its Users (OneSpan as a *processor* of Personal Data). All other data processing done by OneSpan as a controller (e.g., when a website visitor interacts with OneSpan through our websites or through other online or offline interactions) is subject to the terms of the OneSpan [Corporate Privacy Statement](#) available at OneSpan's [Privacy Center](#).

If Customer elects to participate in a demonstration of a product, certain Personal Data may be shared with sub-processors as described in this Statement or as communicated to Customer prior to engagement in the demonstration via a specific privacy notice for the demonstration in question.

Our SaaS Services 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, services, tools, technology or sites or third parties, even if links to their websites are present in our SaaS Services.

Customers are responsible for their own personal information collection, data processing and retention practices in their use of the OneSpan SaaS Services. Customer may, in their use of the SaaS Services, submit Personal Data of Users and End Users to OneSpan. Customer has sole responsibility for the accuracy, quality, and legality of Personal Data of Users and End Users and the means by which Customer or any relevant third party acquired such Personal Data of Users and End Users. Customer agrees to not process, transmit or store within the SaaS Services 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 Customers, electronic communications sent by our Customers to other individuals, or personal data otherwise collected, used, shared or processed by our Customers via our SaaS Services. If you are an End User of a Customer, you should consult the privacy statement of the applicable Customer for information regarding such Customer's collection, processing and retention practices for personal information.

4. FROM WHOM AND WHAT PERSONAL DATA DOES ONESPAN PROCESS?

When a Customer enters into a Contract for the SaaS Services, OneSpan will process certain information including Personal Data of Users and End Users in the administration of the business relationship and the provision of the SaaS Services. Some information Customers provide directly to us, some we obtain by observing how our Customers and their Users or End Users interact with our SaaS Services. Personal Data processed by OneSpan will vary based on (1) how the Customer elects to configure and implement the SaaS Services and (2) what Personal Data Customer elects to process through the SaaS Services as controller.

OneSpan and our sub-processors or service providers may process (actively and passively) the following Personal Data of Customer, Users and End Users:

- Business contact information, user name and password, transactional data (including SaaS Services ordered, financial details and payment methods), usage data for billing, and the User's consent to OneSpan's processing of the User's Personal Data, if applicable.
- All documents with information (including Personal Data) contained in such documents when uploaded in the SaaS Services.
- Biometric data for certain OneSpan SaaS Services providing specific identity (document) verification services: Please refer to the Global Biometrics Privacy Statement for additional information on how we process biometric data.
- Transaction information and transaction results.
- Unique IDs such as a cookie ID on a browser, biometric data or geolocation data, as well as information about devices accessing OneSpan SaaS Services, usage, mobile applications, websites or emails through cookies, web beacons, log files or other technologies, which may qualify as Personal Data.
- Product usage information, including behavioral and biometric usage, usage information including the pages viewed, content clicked, search terms used, the configuration of Customer and User computers, mobile devices, applications and performance metrics related thereto, and other actions taken in connection with the use of the SaaS Services. We may also collect certain information from the browser used to access the SaaS Services, such as IP address, device identifier, location data, browser type and language, access times, the Uniform Resource Locator (URL) of the website that referred the Customer or User to our website and the URL to which the Customer or User browses away from our site by clicking 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 Cookie Technologies that provide OneSpan with product activity data reflecting how Customers and Users enter, navigate, and leave the Product pages they visit, the frequency of their visit and length of stay on any part of the product or third-party websites, application or device usage data, and their product preference indicated by the number of times and the length of time they view, use or access a product.
- Regarding prospective or current Customers participating in demonstrations or trials of our SaaS Services, we may process the following Personal Data of the person designated by Customer to participate in the demonstration or trial: biometric data (facial features, voice patterns, fingerprints, structures of the eye (iris or retina), or other Personal Data that are submitted to use for a product demonstration, testing, proof of concept or other agreed purposes. Such biometric and other data submitted for these purposes will only be used for demonstration, testing, proof of concept or other purposes agreed up front and in writing with the applicable Customer or User. The biometric and other data provided will be erased after the conclusion of the product demonstration, testing, proof of concept or other agreed purposes.

5. HOW DOES ONESPAN USE PERSONAL DATA?

We use Personal Data in the operation of OneSpan's business, both online and offline, and for the delivery of OneSpan SaaS Services.

OneSpan processes Personal Data of Customer as a controller:

- 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; to communicate with Customers and Users regarding SaaS Services and order status; to update account information; and to collaborate, integrate and liaise with third party service providers, suppliers and business partners as needed to provide the SaaS Services.
- To enhance information security and data protection and to investigate and protect OneSpan, our 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 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, Users, employees or others.
- To develop aggregate and individual analysis and business intelligence that enables OneSpan to operate, protect, make informed decisions regarding, and report on the performance of our SaaS Services.
- To use professional contact information (including name, email address, telephone number, job title, or Customer account number) for product improvement, quality control, internal analytics and transaction reporting purposes.
- To communicate news and updates on OneSpan SaaS Services, industry events, promotions, upcoming events, and news about SaaS Services we offer or may be

of interest to Customers, important Product notices including those announcing changes to our terms or policies, promotional offers and surveys. Website users may opt-out of receiving emails regarding OneSpan events and other SaaS Services by visiting the OneSpan [Preference Center](#), however, they will continue to receive notices regarding OneSpan SaaS Services they have purchased and other communication related to their account.

OneSpan processes Personal Data from Users and End Users on behalf of Customer, as a processor:

- To provide access to or deliver the SaaS Services, use and monitor the SaaS Services and associated resources and to administer, configure, test, maintain, support, develop personalize, analyze and improve our SaaS Services and technologies and to perform data analysis and reporting for product, service, information security, security and/or data protection enhancements.
- To link or combine Personal Data processed on behalf of Customer with other personal information we get from third parties, to provide the SaaS Services, perform under our contracts with Customers, and provide our Customers with better and more personalized products.
- To assist our Customers in complying with their controller obligations under applicable data protection laws relevant to User use of the SaaS Services and to inform Customer if, in our reasonable opinion, Customer's written instruction infringes an applicable data protection law.
- For authentication and identification of Users
- For performance and management pursuant to a contractual relationship between User and OneSpan
- For communication with User regarding the SaaS Services, as needed to provide the SaaS Services (this includes sending service communications and communications regarding new functionality, features, services and products)
- Some OneSpan SaaS Services employ masking of certain identifiers related to Personal Data that Customers or Users submit or will submit to OneSpan in the process of using the SaaS Services. When associated with OneSpan SaaS Services, 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 Customer's use of the SaaS Services requires OneSpan to process Personal Data falling within the scope of jurisdictions requiring the conclusion of a data processing or data transfer agreement, the processing of the Personal Data processed by OneSpan on instruction or on behalf of Customer will be done as per the [OneSpan Data Processing Addendum](#) which is available for e-signature at OneSpan's [Privacy](#)

[Center](#).

6. WHAT IS THE LEGAL BASIS FOR PROCESSING PERSONAL DATA?

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

OneSpan as a controller of Customer Personal Data:

- Consent, for example where we have obtained Customer's consent to process Personal Data as described in this Statement. If you are a Customer, you are free to withdraw your consent at any time by contacting Privacy@OneSpan.com. Withdrawal of your consent of processing may render OneSpan unable to continue to provide the SaaS Services. If you withdraw your consent, it will not affect the lawfulness of any processing based on your consent before you withdrew it.
- For compliance with OneSpan's legal obligations and compliance requirements where certain laws require the processing of your Personal Data (for example, health and safety, taxation, anti-money laundering laws, or anti-corruption laws)
- When we need to process your Personal Data to protect your vital interests or those of another person
- In order to communicate adequately with Customer and to respond to Customer requests, we need to process information about Customer and Customer Users, and therefore have a legitimate interest in processing this information, provided always that our legitimate interests are not outweighed by any prejudice or harm to the data subject's rights and freedoms.
- Our legitimate interest in analyzing, developing, improving and optimizing our SaaS Services and in maintaining the security of our sites, networks and systems.
- OneSpan and our service providers, suppliers and sub-processor legitimate interests (which include the provision of the applicable SaaS Services), provided always that our legitimate interests are not outweighed by any prejudice or harm to the data subject's rights and freedoms.

OneSpan as a processor of User and End User Personal Data:

- To comply with contractual obligations to perform the contract between OneSpan and the Customer.
- This includes cases where Customer has provided OneSpan with special categories of Personal Data or sensitive Personal Data. Also in this case, Customer represents to OneSpan that it has obtained the User's and End User's consent or satisfies some other permitted criteria for use.

7. HOW WE SHARE PERSONAL DATA FOR BUSINESS PURPOSES

OneSpan may transfer your Personal Data to other companies within the OneSpan group or to 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 our sub-processors maintain facilities. When OneSpan discloses Personal Data for a business purpose, we enter into 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, to provide adequate protection for the transfer of Personal Data, we put in place contractual arrangements which may include a data processing agreement, model contractual clauses or other contractual arrangements as required in the applicable jurisdiction.

A list of current sub-processors for OneSpan SaaS Services is available on the OneSpan [Privacy Center](#).

OneSpan does not sell, rent, or allow your Personal Data to be used by third parties for their own direct marketing purposes.

OneSpan may share Personal Data to provide the SaaS Services to Customers with the following parties:

- Sub-processors: The sub-processors published for each Product on the OneSpan [Privacy Center](#).
- Service providers (which may or may not also be sub-processors): Third-party service providers (for example, integrated technology partners who provide SaaS Services, infrastructure or hosting services, customer technical or administrative support (e.g., billing or reporting), maintenance, data analytics, order fulfilment, analytics, information technology and related infrastructure provisioning, managed service providers, auditing, and other similar service providers) to enable those service providers to perform business functions related to the Product or functionality regarding the Product on behalf of OneSpan;
- Government: 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, Customer or User safety or the safety of others, investigate fraud, or respond to government requests, including public and government authorities outside a Customer or User's country of residence, for national security and/or law enforcement purposes, provided if not otherwise prohibited, for third party notices regarding to a specific Customer, we will notify the Customer first and cooperate with the Customer in any response to such third parties.
- Other persons: Any Personal Data or other information you choose to submit in community forums, blogs or chat rooms on our websites regarding our SaaS Services 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. Customers and Users should carefully consider whether to submit Personal Data to these forums or social networks and whether to make your profile available to other users and should tailor any content they may submit accordingly.
- Customer: we may share Personal Data of Users and End Users with the

Customer responsible for the applicable User's and End User's access to the SaaS Services;

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 SaaS Services.

We might also share data with third parties if the data has been de-identified, anonymized or pseudonymized or aggregated in a way so it cannot be used to identify Customers or Users.

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

8. HOW LONG DO WE KEEP PERSONAL DATA?

OneSpan as a controller

We may retain 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 applicable Customer Contracts, as well as on the basis of applicable legal requirements (such as applicable statutes of limitation). After expiry of the applicable retention periods, 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 the access and use of such Personal Data as required by applicable law. Website monitoring data are kept for 1 year or longer as per applicable legal requirements.

OneSpan as a processor

Personal Data of Users and End Users processed on behalf of Customer through our SaaS Services are subject to following retention periods:

- General: up to 90 days after the end of the Contract with the Customer
- For OneSpan Sign: up to 60 days after the end of the Contract with the Customer
- For Identity Verification: up to 60 days after the end of the Contract with the Customer

After expiry of the applicable retention periods, 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 the access and use of such Personal Data as required by applicable law.

Additional information on retention periods deviating from the above applied by sub-processors can be found in the relevant sub-processor list for the applicable

SaaS Service on the [Privacy Center](#).

9. INTERNATIONAL TRANSFER OF PERSONAL DATA

OneSpan operates worldwide and Personal Data is processed globally. This may involve the transfer of Personal Data to countries outside a Customer, User or End User's home country or region, including outside the European Economic Area if applicable, which may have a different level of data protection from the Customer, User or End User's home country. To provide adequate protection for the transfer of Personal Data, where appropriate, we have in place contractual arrangements (such as, but not limited to, the European Commission's Standard Contractual Clauses) with OneSpan and our 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 the Personal Data processed by OneSpan on behalf of Customer offers an adequate level of protection, for instance by entering into the appropriate agreements and, if required, European Commission Standard Contractual Clauses for the transfer of data or equivalent standards mandatory in another applicable jurisdiction. Data submitted by Customer to the SaaS Services 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. Regarding certain SMS functionality and similar SaaS Services, transfers may be made in connection with routing your communications in the most efficient way. The data processing location of SMS functionality depends thus on the telephony and telecom provider.

10. HOW IS 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. Product agreements may include a description of specific technical, physical and organizational measures applicable to certain SaaS Services. Access to Personal Data is strictly limited to our employees and trusted partners including sub-processors, third parties and service providers who have a need to access Personal Data while assisting OneSpan in the performance of the Contract.

More information on technical and organizational measures taken by OneSpan as a processor can be found in the [OneSpan Data Processing Addendum](#) in the [Privacy Center](#). This links to the [Global Security and Privacy Schedule](#), which is part of the [OneSpan Master Terms](#).

For the technical and organizational measures applicable to the Personal Data that is processed by OneSpan as a controller, reference is made to the relevant section in the [OneSpan Corporate Privacy Statement](#) in the [Privacy Center](#).

An [Information Security Disclosure](#) document is also available on the [Privacy Center](#).

11. RESPONDING TO DATA SUBJECT REQUESTS

As between OneSpan and our Customers, each Customer is the controller of its Users'

Personal Data. Customer Users, including End Users, should direct any requests related to their Personal Data to Customer, who is the controller of their data. To the extent such access is not available to Customer, OneSpan will provide Customer with 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 a User or End User contacts OneSpan directly, we will refer the End User's request to the relevant OneSpan Customer. For the rights of data subjects whose Personal Data is processed by OneSpan as a controller, reference is made to the relevant section in the OneSpan [Corporate Privacy Statement](#) in the [Privacy Center](#).

12. DO NOT TRACK SIGNALS AND COOKIES

Please note that you may 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. Please also consult our [Cookie Statement](#) and our [Corporate Privacy Statement](#).

13. YOUR RIGHTS

Individuals whose Personal Data is processed, may have certain rights under Applicable Data Protection Laws, which may include:

- Right to Access: You can request access to the Personal Data we hold about you.
- Right to Rectification: You have the right to request the correction of inaccurate or incomplete Personal Data.
- Right to Erasure: You can request the deletion of your Personal Data under certain circumstances.
- Right to Restrict Processing: You have the right to request the limitation of processing your Personal Data.
- Right to Data Portability: You can request the transfer of your Personal Data to another controller.
- Right to Object: You have the right to object to the processing of your Personal Data on grounds relating to your particular situation.
- Right to Withdraw Consent: If processing is based on your consent, you have the right to withdraw your consent at any time.

To exercise your rights or seek further information about our data processing activities, please contact us using the contact details in Section 14 "CONTACTING ONESPAN".

14. 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 Belgian Data Protection Authority:

Drukpersstraat 35, 1000 Brussels
Tel. 02 274 48 00
Fax. 02 274 48 35
E-mail: contact@apd-gba.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
1 Marina Park Drive, Unit 1410
Boston, MA 02210

For Data Subjects located the EU/EEA or another jurisdiction requiring a Data Protection officer, written inquiries may be emailed to Privacy@onespan.com or addressed to:

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

This Statement was last updated in September 2023.