



ONESPAN PRODUCTS – DATA PROCESSING INFORMATION

Terms not defined herein shall have the meaning given to them in the agreement between OneSpan (“OneSpan” or “Supplier”) and the Customer, including the applicable Data Processing Addendum (the “DPA”) and the OneSpan SaaS Service Descriptions. The products described in this document are resold by OneSpan under a Reseller Agreement with ThreatFabric B.V. (“ThreatFabric”).

In respect of these products, OneSpan is the customer-facing ICT third-party service provider under Article 30 of Regulation (EU) 2022/2554 (“DORA”) and acts as Processor for the Customer. ThreatFabric B.V. is positioned as an ICT subcontractor and Sub-processor in the supply chain. In SaaS deployments, Amazon Web Services acts as a further sub-processor for hosting purposes.

To receive notification of a change in the sub-processors listed in this document, contact OneSpan at ProcessorNotification@onespan.com and indicate the specific Product (FRS Malware Risk, FRS Device Risk, FRS Behaviour Risk, Mobile Threat Intelligence, and/or Malware Signatures API) for which notification is requested. The list of OneSpan sub-processors is also published at www.onespan.com/privacy-center.

This Product is a fraud detection solution. The behavioural analytics performed by FRS Behaviour Risk do not constitute biometric data within the meaning of Article 9 GDPR. They are statistical patterns of human-device interaction (typing rhythm, swipe pressure, motion) and are not bound to physiological identifiers such as facial features or fingerprints. OneSpan does not process special categories of personal data within the meaning of Article 9 GDPR through these products.

I. FRS Malware Risk

Sub-processor Overview for FRS Malware Risk (SaaS)

Sub-processor	Purpose / Data Processing Activity	Processing or Storage Location	Flow-down Terms
OneSpan NV	Customer-facing ICT third-party service provider under DORA Art. 30; Processor for the Customer; manages the customer relationship and contractual flow-down.	Belgium and OneSpan affiliate locations as listed in the OneSpan sub-processor list.	Per OneSpan DPA
ThreatFabric B.V.	Sub-processor. Development, operation and support of the FRS Malware Risk SaaS, including malware analytics, risk scoring and analyst tooling.	Netherlands (Radarweg 60, 1043 NT Amsterdam).	Per Reseller Agreement DPA
Amazon Web Services	Further sub-processor. Cloud infrastructure provider hosting the FRS SaaS environment (compute, storage, networking).	EEA — Frankfurt (eu-central-1) by default. Alternative AWS EU regions on Customer request. No transfer outside the EEA without prior written Customer permission.	DPA between ThreatFabric and AWS

Sub-processor Overview for FRS Malware Risk (On-premises / private cloud)

Sub-processor	Purpose / Data Processing Activity	Processing or Storage Location	Flow-down Terms
OneSpan NV	Customer-facing ICT third-party service provider; coordinates support and maintenance with ThreatFabric.	Belgium and OneSpan affiliate locations.	Per OneSpan DPA
ThreatFabric B.V.	Product development and support only. No Customer personal data is processed by ThreatFabric in this deployment model; processing remains within the Customer’s environment.	Netherlands (development and support). Production data processed at Customer premises in EU/EEA.	Per Reseller Agreement DPA



ONESPAN PRODUCTS – DATA PROCESSING INFORMATION

2. FRS Device Risk

Sub-processor Overview for FRS Device Risk (SaaS)

Sub-processor	Purpose / Data Processing Activity	Processing or Storage Location	Flow-down Terms
OneSpan NV	Customer-facing ICT third-party service provider under DORA Art. 30; Processor for the Customer.	Belgium and OneSpan affiliate locations.	Per OneSpan DPA
ThreatFabric B.V.	Sub-processor. Development, operation and support of the FRS Device Risk SaaS, including device-risk analytics, risk scoring and analyst tooling.	Netherlands (Radarweg 60, 1043 NT Amsterdam).	Per Reseller Agreement DPA
Amazon Web Services	Further sub-processor. Cloud infrastructure provider hosting the FRS SaaS environment.	EEA — Frankfurt (eu-central-1) by default. Alternative AWS EU regions on Customer request. No transfer outside the EEA without prior written Customer permission.	DPA between ThreatFabric and AWS

Sub-processor Overview for FRS Device Risk (On-premises / private cloud)

Sub-processor	Purpose / Data Processing Activity	Processing or Storage Location	Flow-down Terms
OneSpan NV	Customer-facing ICT third-party service provider; coordinates support and maintenance.	Belgium and OneSpan affiliate locations.	Per OneSpan DPA
ThreatFabric B.V.	Product development and support only. No Customer personal data is processed by ThreatFabric in this deployment model; processing remains within the Customer's environment.	Netherlands (development and support). Production data processed at Customer premises in EU/EEA.	Per Reseller Agreement DPA

3. FRS Behaviour Risk

Sub-processor Overview for FRS Behaviour Risk (SaaS)

Sub-processor	Purpose / Data Processing Activity	Processing or Storage Location	Flow-down Terms
OneSpan NV	Customer-facing ICT third-party service provider under DORA Art. 30; Processor for the Customer.	Belgium and OneSpan affiliate locations.	Per OneSpan DPA
ThreatFabric B.V.	Sub-processor. Development, operation and support of the FRS Behaviour Risk SaaS, including behavioural analytics, risk scoring, model training and analyst tooling.	Netherlands (Radarweg 60, 1043 NT Amsterdam).	Per Reseller Agreement DPA
Amazon Web Services	Further sub-processor. Cloud infrastructure provider hosting the FRS SaaS environment.	EEA — Frankfurt (eu-central-1) by default. Alternative AWS EU regions on Customer request. No transfer outside the EEA without prior written Customer permission.	DPA between ThreatFabric and AWS

Sub-processor Overview for FRS Behaviour Risk (Private cloud)

Sub-processor	Purpose / Data Processing Activity	Processing or Storage Location	Flow-down Terms
OneSpan NV	Customer-facing ICT third-party service provider; coordinates support and maintenance.	Belgium and OneSpan affiliate locations.	Per OneSpan DPA
ThreatFabric B.V.	Product development and support only. Processing of behavioural data	Netherlands (development and support).	Per Reseller



ONESPAN PRODUCTS – DATA PROCESSING INFORMATION

Sub-processor	Purpose / Data Processing Activity	Processing or Storage Location	Flow-down Terms
	takes place within the Customer-managed private cloud environment in the EU/EEA.	Production data processed in Customer-managed EU/EEA private cloud.	Agreement DPA

Note: FRS Behaviour Risk is not offered as an on-premises deployment.

4. Mobile Threat Intelligence (MTI)

Sub-processor Overview for Mobile Threat Intelligence (SaaS)

Sub-processor	Purpose / Data Processing Activity	Processing or Storage Location	Flow-down Terms
OneSpan NV	Customer-facing ICT third-party service provider under DORA Art. 30; Processor for the Customer.	Belgium and OneSpan affiliate locations.	Per OneSpan DPA
ThreatFabric B.V.	Sub-processor. Operation of the MTI portal and feeds, sample analysis, monitoring & alerting, RFI service and threat briefings.	Netherlands (Radarweg 60, 1043 NT Amsterdam).	Per Reseller Agreement DPA
Amazon Web Services	Further sub-processor. Cloud infrastructure provider hosting the MTI environment.	EEA — Frankfurt (eu-central-1) by default.	DPA between ThreatFabric and AWS

5. Malware Signatures API

Sub-processor Overview for Malware Signatures API (SaaS)

Sub-processor	Purpose / Data Processing Activity	Processing or Storage Location	Flow-down Terms
OneSpan NV	Customer-facing ICT third-party service provider under DORA Art. 30; Processor for the Customer.	Belgium and OneSpan affiliate locations.	Per OneSpan DPA
ThreatFabric B.V.	Sub-processor. Operation of the Malware Signatures API, including signature curation and delivery.	Netherlands (Radarweg 60, 1043 NT Amsterdam).	Per Reseller Agreement DPA
Amazon Web Services	Further sub-processor. Cloud infrastructure provider hosting the API.	EEA — Frankfurt (eu-central-1) by default.	DPA between ThreatFabric and AWS

Sub-processor Overview for Malware Signatures API (On-premises / private cloud)

Sub-processor	Purpose / Data Processing Activity	Processing or Storage Location	Flow-down Terms
OneSpan NV	Customer-facing ICT third-party service provider; coordinates delivery of signature feeds.	Belgium and OneSpan affiliate locations.	Per OneSpan DPA
ThreatFabric B.V.	Provision of signature feeds for ingestion into the Customer's environment. No Customer personal data is processed by ThreatFabric in this deployment model.	Netherlands.	Per Reseller Agreement DPA