

Last Updated: January 1, 2020

Welcome! Thank you for visiting Zelle®.

The *Zelle Network* (referred to as "*Zelle*," "we," "our," or "us") provides a service that enables a convenient way to transfer money between you and others who are enrolled directly with *Zelle* or enrolled with a financial institution that partners with *Zelle* (each, a "User") using aliases, such as email addresses or mobile phone numbers. We refer to financial institutions that have partnered with *Zelle* as "Network Financial Institutions."

This privacy policy ("Privacy Policy") explains our information privacy practices and the choices you can make about the collection, use, disclosure, and retention of information you submit or we collect through our website zellepay.com and/or the *Zelle* mobile app. We specify in this Privacy Policy when the contents apply to our website or the *Zelle* mobile app and we use the term "Site" when the contents apply to both. The Site is owned and operated by Early Warning Services, LLC.

To make this Privacy Policy easy to find, we make it available on the zellepay.com homepage and in the *Zelle* mobile app. You may also call 844.212.9102 (Monday through Friday, 8am to 5pm ET, excluding federal holidays) to request a copy by US mail.

[Contents & Summary](#)

A list summarizing the contents of this Privacy Policy appears below, followed by the full [Privacy Policy](#). Should there be any discrepancy between the summary and the full Privacy Policy, the language of the full Privacy Policy governs.

[Scope and Consent](#)

By using the Site, you expressly consent to our collection, use, disclosure, and retention of your personal information and other information as described in this Privacy Policy.

Your use of the website and/or *Zelle* mobile app is also governed by the User Service Agreement [User Service Agreement](#), the [Just in Time Notice](#), and [Terms of Use](#). Do not use the Site if you do not agree to these terms.

[Information We Collect, Disclose for a Business Purpose, and Sell](#)

When you use the Site, we may collect or access the following information:

- Personal and online identifiers (such as first and last name, email address, or unique online identifiers)
- Certain customer record information (such as address, telephone number, financial account numbers, or any other financial information)

- Commercial or transaction information (such as records of transactions made through *Zelle*)
- Internet or other electronic network activity information (such as browsing history, search history, interactions with our Site)
- Biometric information (such as call recordings)
- Geolocation information
- Other information about you that is linked to the personal information above (such as information you associate with your *Zelle* profile)

See [Section 2](#) for more information.

Categories of Sources of Personal Information We Collect

We collect personal information from the following categories of sources:

1. Users of the Site (when accessing or using the Site);
2. Users' devices (when accessing or using the Site);
3. Network Financial Institutions; and
4. Service providers.

See [Section 3](#) for more information.

Why We Collect, Use, and Share Information for Business and Commercial Purposes

We use and disclose the personal information we collect for our commercial and business purposes, including, without limitation:

- a. Preventing, detecting and protecting against security incidents, fraud and prohibited or illegal activities;
- b. Performing services (for us or our service providers) such as account servicing, providing customer service, fulfilling transactions, verifying consumer information, providing analytic services;
- c. Internal research for technological improvement;
- d. Internal operations;
- e. Verifying the existence of your financial account;
- f. To enforce our terms and conditions;
- g. Researching and resolving issues related to transactions you sent or received;
- h. Debugging;
- i. Facilitating transactions, including enabling our Network Financial Institutions to complete money transfers between their customers and you;
- j. Notifying you, by text or email, of a pending money transfer or a request for payment;
- k. Facilitating enrollment and resolving issues relating to enrollment;
- l. Identity verification;
- m. Verifying changes you have made to your personal information;

- n. To create and deliver targeted marketing and advertising tracked to what we believe may potentially interest you;
- o. Auditing related to our interactions with you;
- p. Activities to create, develop, operate, deliver, maintain and improve our products and services;
- q. Legal compliance;
- r. Responding to your requests and complying with your stated communication preferences;
- s. Providing you with a safe, efficient, and customized experience;
- t. Authentication;
- u. Providing other services you request; and
- v. Other one-time uses.

See [Section 4](#) for more information.

Recipients of Personal Information

We sell some of the categories of personal information designated above to the categories of third parties listed below:

- a. Advertising networks

We may disclose the categories of personal information designated above to the categories of third parties listed below for business purposes:

- a. Other Zelle Users;
- b. The Early Warning Services, LLC corporate family;
- c. Our Network Financial Institutions;
- d. Our service providers;
- e. Law enforcement, government agencies and other authorized third parties;
- f. New owners (in the event we plan to merge with or be acquired by that business entity);
- g. Companies in the mobile app industry;
- h. Ad networks; and
- i. Other entities with your consent.

See [Section 5](#) for more information.

Your Choices

You can control how and when you want to receive notifications from us by following instructions within the notices you receive from us and by updating your preferences in the *Zelle* mobile app.

You may request to cancel your profile and enrollment with *Zelle* by speaking to a customer service representative at 844.428.8542 (8am to midnight EST, excluding

federal holidays). However, doing so will immediately terminate your ability to use the service.

See [Section 6](#) for more information.

[Your Rights Regarding Personal Information](#)

We provide notice of the following rights you have, regardless of whether we are obligated by law to observe them and regardless of your state of residence:

- For certain categories of personal information, the **right to request** a list of what personal information (if any) we disclosed to third parties for their own direct marketing purposes in the preceding calendar year and the names and addresses of those third parties;
- The **right to know** the categories and specific pieces of personal information we collect, use, disclose, and sell about you, our business and commercial purposes for collecting such personal information, categories of third parties with whom the business shares personal information, the categories of sources from which we collected your personal information, whether we have disclosed or sold your personal information for a business or commercial purposes in the preceding 12 months, and the categories of third parties with which we have shared or sold your personal information;
- The **right to request that we delete** the personal information we have collected from you or maintain about you;
- The right to **opt out of our sale(s)** of your personal information;
- The **right to be free from discrimination** for exercising your privacy rights; and
- The **right to access** your personal information that we have about you going back for a 12-month period following your request.

See [Section 7](#) for more information, including for instructions on how to exercise your rights.

[Verification Process and Required Information](#)

We may need to request additional information from you to verify your identity or understand the scope of your request, although you will not be required to create an account with us to submit a request or have it fulfilled.

See [Section 8](#) for more information.

[Authorized Agent](#)

You may designate an authorized agent to make a request on your behalf.

See [Section 9](#) for more information.

Minors' Right to Opt In

The Site does not knowingly collect information from children as set forth above, however if we ever do, we will provide an opt-in before selling any such data of children.

See [Section 10](#) for more information.

Accessing, Reviewing and Updating Personal Information

You can access, review, and update your personal information at any time by accessing your profile in the *Zelle* mobile app.

See [Section 11](#) for more information.

Our Data Retention Practices

We generally retain information for as long as it is necessary and relevant for our operations and to comply with applicable law.

You may request to cancel your profile and enrollment with *Zelle* by speaking to a customer service representative at 844.428.8542 (8am to midnight EST, excluding federal holidays). Information from closed or suspended profiles will only be retained as necessary to comply with law, prevent fraud, prevent re-registration, assist with investigations, resolve disputes, analyze or troubleshoot programs, enforce our terms and conditions, or take other actions permitted by law.

See [Section 12](#) for more information.

How We Use Cookies and Tracking Technologies

We use tracking technologies (including cookies) to recognize you, protect your privacy, and customize your experience on the Site.

See [Section 13](#) for more information.

Notice to California Residents

If you are a California resident, you may request information about our practices related to disclosing your personal information and how we respond to Do Not Track signals.

See [Section 7](#) and [14](#) for more information.

Links to Third-Party Websites

We are not responsible for the privacy practices of third-party websites that are linked to or from our Site. Please refer to the privacy notices of those websites for information regarding their privacy practices.

See [Section 15](#) for more information.

Security

To help us protect the privacy of your data, we maintain technical, physical, and administrative security measures to protect against loss, misuse, unauthorized access, disclosure, or alteration. Some of the safeguards we use are firewalls, data encryption, physical access controls to our data centers and information access authorization controls.

See [Section 16](#) for more information.

Children's Privacy

The [User Service Agreement](#) defines eligibility requirements to use the *Zelle* mobile app. Our Site is not intended for children under the age of 13. **For information about the Children's Online Privacy Protection Act (COPPA), visit the FTC website: www.ftc.gov.**

See [Section 17](#) for more information.

Territorial Scope and Processing

We are located in the United States. Our services are available for eligible United States users only. Our operations use a network of computers, cloud-based services, and other infrastructure and information technology that are based in the United States. Additionally, we may use third-party service providers that may be located in and process or store your personal information in the United States, the European Union, and other countries. If you create a profile, you consent to the collection and/or processing of your personal information and tracking technologies/cookies as described in this Privacy Policy.

See [Section 18](#) for more information.

Notification Regarding Updates to This Privacy Policy

You agree that we may notify you about material changes to this Privacy Policy by posting notices on this Site.

See [Section 19](#) for more information.

Contact for More Information

Privacy issues are handled by our Privacy Office. For more information about our privacy practices, please continue to our full Privacy Policy below or send an email to privacyoffice@earlywarning.com.

See [Section 20](#) for more information.

Full Privacy Policy

1. Scope and Consent

When you use the Site, you are contracting with Early Warning Services, LLC, located at 16552 N. 90th Street, Scottsdale, AZ 85260. By using the Site, you expressly consent to our collection, use, disclosure, and retention of your personal information as described in this Privacy Policy.

Your use of the website and/or *Zelle* mobile app is also governed by the Service Agreement [User Service Agreement](#), the [Just in Time Notice](#), and [Terms of Use](#). Do not use the Site if you do not agree to these terms.

2. Personal Information We Collect, Disclose for a Business Purpose, and Sell

When you use the Site, we collect the categories of personal information about you identified in the chart below. As further set forth in the chart below, in the past 12 months, we have disclosed and sold your personal information to third parties for business or commercial purposes.

Categories of Personal Information Collected in the last 12 months:	Categories of sources from which information is collected:	Business or commercial purposes for collection, use, and sharing:	Disclosed for business purposes to the following categories of third parties:	Sold to the following categories of third parties:
Personal and online identifiers (such as name, email address, IP address or unique online identifiers)	All categories listed below in Section 3.	All purposes listed below in Section 4.	All categories listed below in Section 5.	All categories listed below in Section 5.
Certain customer record information (such as address, telephone)	All categories listed below in Section 3.	All purposes listed below in Section 4.	All categories listed below in Section 5.	No

Categories of Personal Information Collected in the last 12 months:	Categories of sources from which information is collected:	Business or commercial purposes for collection, use, and sharing:	Disclosed for business purposes to the following categories of third parties:	Sold to the following categories of third parties:
number, financial account numbers, or any other financial information)				
Commercial or transactions information (such as records of transactions made through Zelle)	All categories listed below in Section 3.	All purposes listed below in Section 4.	All categories listed below in Section 5.	No
Internet or other electronic network activity information (such as browsing history, search history, interactions with a website, email, application, or advertisement)	All categories listed below in Section 3.	All purposes listed below in Section 4.	All categories listed below in Section 5.	No
Biometric information (such as call recordings)	All categories listed below in Section 3.	All purposes listed below in Section 4.	All categories listed below in Section 5.	No
Geolocation information	All categories listed below.	All purposes listed below.	All categories listed below.	All categories listed below in Section 5.
Other information about you that is linked to the personal information above (such as information you	All categories listed below in Section 3.	All purposes listed below in Section 4.	All categories listed below in Section 5.	No

Categories of Personal Information Collected in the last 12 months:	Categories of sources from which information is collected:	Business or commercial purposes for collection, use, and sharing:	Disclosed for business purposes to the following categories of third parties:	Sold to the following categories of third parties:
associate with your <i>Zelle</i> profile)				

3. Categories of Sources of Personal Information We Collect

We collect personal information from the following categories of sources:

- a. Users of the Site (when accessing or using the Site);
- b. Users' devices (when accessing or using the Site);
- c. Network Financial Institutions; and
- d. Service providers.

4. Why We Collect, Use, and Share Information for Business and Commercial Purposes

We use and disclose the personal information we collect for our commercial and business purposes, as further described in this Privacy Policy. These commercial and business purposes include, without limitation:

- a. Preventing, detecting and protecting against security incidents, fraud and prohibited or illegal activities;
- b. Performing services (for us or our service providers) such as account servicing, providing customer service, fulfilling transactions, verifying consumer information, providing analytic services;
- c. Internal research for technological improvement;
- d. Internal operations;
- e. Verifying the existence of your financial account;
- f. To enforce our terms and conditions;
- g. Researching and resolving issues related to transactions you sent or received;
- h. Debugging;
- i. Facilitating transactions, including enabling our Network Financial Institutions to complete money transfers between their customers and you;
- j. Notifying you, by text or email, of a pending money transfer or a request for payment;
- k. Facilitating enrollment and resolving issues relating to enrollment;

- l. Identity verification;
- m. Verifying changes you have made to your personal information;
- n. To create and deliver targeted marketing and advertising tracked to what we believe may potentially interest you;
- o. Auditing related to our interactions with you;
- p. Activities to create, develop, operate, deliver, maintain and improve our products and services;
- q. Legal compliance;
- r. Responding to your requests and complying with your stated communication preferences;
- s. Providing you with a safe, efficient, and customized experience;
- t. Authentication;
- u. Providing other services you request; and
- v. Other one-time uses.

5. Recipients of Personal Information

Sale

We sell some of the categories of personal information designated above to the categories of third parties listed below:

1. Advertising networks

Disclosure

We may disclose the categories of personal information designated above to the categories of third parties listed below for business purposes:

- a. Other *Zelle* Users (for example, when another User sends you a payment, we may share your name (from your *Zelle* profile) with the other User to ensure the other User intends to send a payment to you. We do not share your financial account information with other *Zelle* Users.);
- b. The Early Warning Services, LLC corporate family;
- c. Our Network Financial Institutions;
- d. Our service providers;
- e. Law enforcement, government agencies and other authorized third parties;
- f. New owners (in the event we plan to merge with or be acquired by that business entity);
- g. Companies in the mobile app industry;
- h. Ad networks; and
- i. Other entities with your consent.

6. Your Choices

You can control how and when you want to receive notifications from us by following instructions within the notices you receive from us and by updating your preferences in the *Zelle* mobile app.

To opt out of marketing communications from us, use the options in the communications we send or send an email request to requestoptout@earlywarning.com.

You may not opt-out of administrative emails (for example, emails about your transactions or policy changes) for your enrolled profile.

You may request to cancel your profile and enrollment with *Zelle* by speaking to a customer service representative at 844.428.8542 (8am to midnight EST, excluding federal holidays). However, doing so will immediately terminate your ability to use the service.

7. Your Rights Regarding Personal Information

We provide the *Zelle* service pursuant to the Graham-Leach-Bliley Act (“GLBA”) and as such are exempted from certain privacy and data security laws (e.g., the California Consumer Privacy Act (CCPA)). We provide notice of the following rights you have, regardless of whether we are obligated by law to observe them and regardless of your state of residence:

- For certain categories of personal information, the **right to request** a list of what personal information (if any) we disclosed to third parties for their own direct marketing purposes in the preceding calendar year and the names and addresses of those third parties;
- The **right to know** the categories and specific pieces of personal information we collect, use, disclose, and sell about you, our business and commercial purposes for collecting such personal information, categories of third parties with whom the business shares personal information, the categories of sources from which we collected your personal information, whether we have disclosed or sold your personal information for a business or commercial purposes in the preceding 12 months, and the categories of third parties with which we have shared or sold your personal information;
- The **right to request that we delete** the personal information we have collected from you or maintain about you;
- The right to **opt out of our sale(s)** of your personal information;
 - Please note that if you opt out of certain types of sales, we will be unable to provide you with the services that rely on such sales.
 - *Zelle* does not sell your data for money, but we do use cookies and other tracking technologies. You can opt-out of the sale of cookie data to advertising networks as outlined below in [Section 13 “How We Use Cookies and Tracking Technologies.”](#)

- The **right to be free from discrimination** for exercising your privacy rights.
- The **right to access** your personal information that we have about you going back for a 12-month period following your request.

To exercise any of the above rights or access your personal information, please contact us using the following information and submit the required verifying information, as further described below:

- [Click here to submit your request online using your Zelle login credentials](#)
- Reach us by phone at 844.212.9102 (Monday through Friday, 8am to 5pm ET, excluding federal holidays)

Please note the above-listed rights are subject to certain exceptions. For instance, we cannot disclose or permit access to specific pieces of personal information if the disclosure or access would present a certain level of risk to the security of the personal information, your account with us or the security of our systems or networks.

8. Verification Process and Required Information

We may need to request additional information from you to verify your identity or understand the scope of your request, although you will not be required to create an account with us to submit a request or have it fulfilled.

For requests made online, at a minimum, your identity will be verified through your existing *Zelle* password protected account and a One-Time Password (OTP) secure authorization.

For requests made by phone, at a minimum, your identity will be verified by matching certain personal information provided by you with personal information maintained by us. We may use a third-party identity verification service to assist us with verifying your identity.

9. Authorized Agent

You may designate an authorized agent to make a request on your behalf. Your authorized agent will be required to produce a signed authorization from you and additional identity verification may be required. Authorized agent requests may be made by phone at 844.212.9102 (Monday through Friday, 8am to 5pm ET, excluding federal holidays).

10. Minors' Right to Opt In

The Site does not knowingly collect information from children as set forth above, however if we ever do, we will provide an opt-in before selling any such data of children.

11. Accessing, Reviewing, and Updating Your Personal Information

You can access, review and update your personal information at any time by accessing your profile in the *Zelle* mobile app. You can update your User profile and registration information, including your financial account, personal information and email addresses/mobile numbers. Keeping this information up-to-date is very important. If this information is incomplete, inaccurate or not current, please update your information by looking into your profile.

12. Our Data Retention Practices

We generally retain information for as long as it is necessary and relevant for our operations and to comply with applicable law.

You may request to cancel your profile and enrollment with *Zelle* by speaking to a customer service representative at 844.428.8542 (8am to midnight EST, excluding federal holidays). Information from closed or suspended profiles will only be retained as necessary to comply with law, prevent fraud, prevent re-registration, assist with investigations, resolve disputes, analyze or troubleshoot programs, enforce our terms and conditions, or take other actions permitted by law.

13. How We Use Cookies and Tracking Technologies

When you visit the Site, you consent to the use of cookies and tracking technologies as well as the corresponding processing of your personal information. We and our third parties may use cookies and other tracking technologies for a variety of purposes, as outlined in this Privacy Policy and as described below.

To change your cookie preferences or to opt-out of the sale of cookie data to advertising networks (targeting cookies), [click here](#).

For further information about our use of cookies and tracking technologies and your opt-out choices, see [Your Cookie Choices & How to Opt-Out](#).

- a. **Strictly Necessary Cookies.** These are cookies which are needed to provide services and features you have specifically requested. We may use cookies and tracking technologies required to prevent fraudulent activity, improve security, and/or for system administration. We are not required to obtain your consent to cookies that are strictly necessary.
- b. **Analytics and Performance-Related Cookies.** We may use cookies to assess the performance of our Site, including as part of our analytic practices to improve the services offered through the Site. These cookies may be used to prevent fraudulent activity and improve security
- c. **Functionality-Related Cookies.** We may use cookies to tell us, for example, whether you have visited the Site before or if you are a new visitor and to help us identify the features in which you may have the greatest interest.
- d. **Targeting-Related Cookies.** We may use cookies to deliver content, including ads, relevant to your interests on our Site and third-party sites based on how you

interact with our advertisements or content. We have set out further information about the use of cookies by our Ad Network partners below.

During some visits we may use software tools to measure and collect session information, including page response times, download errors, time spent on certain pages and page interaction information.

A few additional important things you should know about our use of tracking technologies (e.g., cookies, HTML-5 stored technologies):

- We offer certain features that are available only through the use of tracking technologies.
- We use both persistent and temporary tracking technologies. Tracking technologies (e.g., cookies) can either be persistent (i.e., they remain on your computer until you delete them) or temporary (i.e., they last only until you close your browser). You are always free to decline tracking technologies if your browser permits, although doing so may interfere with your use of the Site. Refer to the help section of your browser, browser extensions, or installed applications for instructions on blocking, deleting, or disabling tracking technologies such as cookies.
- We use cookies and tracking technologies with your prior consent as obtained through your use of this Site.
- You may encounter tracking technologies/cookies from our third-party service providers that we have allowed on our Site that assist us with various aspects of our Site operations and services, such as Google Analytics.
- To learn more about limiting the collection of tracking technology/cookie data, visit [Ad Choices](#).

For more information about the use of cookies and similar technology on our Site, please review [Sections 2, 3, 4](#), and [5](#) of this Privacy Policy and our [Cookies and Tracking Technologies Policy](#).

14. Notice to California Residents

How We Respond to Do Not Track Signals for California Residents: California Business & Professions Code Section 22575(b) (as amended effective January 1, 2014) provides that California residents are entitled to know how we respond to "Do Not Track" browser settings. We do not currently take actions to respond to Do Not Track signals because a uniform technological standard has not yet been developed. We continue to review new technologies and may adopt a standard once one is created.

15. Links to Third-Party Websites

Our website may contain links to other third-party websites, such as our Network Financial Institutions. When you leave our website and visit those websites, you are bound by the privacy policies of those websites. We are not responsible for the privacy

practices of these third party websites, which are governed by their own privacy policies and practices.

16. Security

To help us protect the privacy of your data, we maintain technical, physical, and administrative security measures to protect against loss, misuse, unauthorized access, disclosure, or alteration. Some of the safeguards we use are firewalls, data encryption, physical access controls to our data centers and information access authorization controls. It is your responsibility to make sure that your personal information is accurate and that your password(s) and profile registration information are secure and not shared with third-parties. Additionally, we use security features that are built into the hardware and software of your device to help protect your transactions, such as facial or fingerprint recognition. We do not collect or store your biometric verification information when you use the *Zelle* mobile app.

17. Children's Privacy

The [User Service Agreement](#) defines eligibility requirements to use the Zelle mobile app. Our Site is not intended for children under the age of 13. **For information about the Children's Online Privacy Protection Act (COPPA), visit the FTC website: www.ftc.gov.**

18. Territorial Scope and Processing

We are located in the United States. Our services are available for eligible United States users only. Our operations use a network of computers, cloud-based services, and other infrastructure and information technology that are based in the United States. Additionally, we may use third-party service providers that may be located in and process or store your personal information in the United States, the European Union, and other countries. If you create a profile, you consent to the collection and/or processing of your personal information and tracking technologies/cookies as described in this Privacy Policy.

19. Notification Regarding Updates to This Privacy Policy

From time to time, we may update this Privacy Policy. You agree that we may notify you about material changes in the way we treat personal information by placing a notice on the Site. You should check the Site frequently for updates.

20. Contact for More Information

If your questions are not answered in this Privacy Policy, you may email us at privacyoffice@earlywarning.com, or write to us at Early Warning Services, LLC., Attn: Privacy Office, 16552 N. 90th St, Scottsdale, AZ 85260.

