



## FACTS

### WHAT DOES ZELLE® DO WITH YOUR PERSONAL INFORMATION?

<b>Why?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
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<b>What?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Social Security number</li> <li>• Financial account information, including your debit card information</li> <li>• <b>Account transactions</b> occurring through your use of the <i>Zelle</i> mobile application (the “<i>Zelle</i> App”)</li> <li>• <b>Zelle transaction history</b>, including information about payments requested, sent, and received, occurring through your use of the <i>Zelle</i> App</li> <li>• <b>Payment history</b> for transactions made through your use of the <i>Zelle</i> App</li> <li>• <b>Checking account information</b> (no longer collected in the <i>Zelle</i> App as of the date of this notice)</li> <li>• <b>Account balances</b> (no longer collected in the <i>Zelle</i> App as of the date of this notice)</li> <li>• Other nonpublic information collected/transmitted by us in connection with your registration for or use of the <i>Zelle</i> App (e.g., geo-location, mobile phone number, email address, your name, payment information, passwords, passively collected information via tracking technologies such as cross-device tracking, unique device identifiers, unique device tokens, identity of your mobile device)</li> </ul> <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>
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<b>How?</b>	All financial companies need to share <b>customers’</b> personal information to run their everyday business. In the section below, we list the reasons financial companies can share their <b>customers’</b> personal information; the reasons <i>Zelle</i> chooses to share; and whether you can limit this sharing.
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Reasons we can share your personal information	Does <i>Zelle</i> share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your <i>Zelle</i> App Profile(s), respond to court orders and legal investigations, or report to credit bureaus.	Yes	No
<b>For administrative purposes—</b> such as to advise you of information regarding your <i>Zelle</i> App Profile or a transfer you have initiated or received.	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	No	We don’t share
<b>For joint marketing of the <i>Zelle</i> service with other financial companies</b>	No	We don’t share
<b>For our affiliates’ everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates’ everyday business purposes—</b> information about your creditworthiness	No	We don’t share
<b>For our affiliates to market to you</b>	No	We don’t share
<b>For nonaffiliates to market to you</b>	No	We don’t share

## Questions?

Go to <https://www.zellepay.com/privacy-policy>. If your questions are not answered online, you may email us at [privacyoffice@earlywarning.com](mailto:privacyoffice@earlywarning.com) or write us at Early Warning Services, LLC. Attn: Privacy Office, 16552 N. 90<sup>th</sup> Street, Scottsdale, AZ 85260.

## Page 2

### Who we are

**Who is providing this notice?** Early Warning Services, LLC

### What we do

**How does Zelle protect my personal information?**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

We maintain technical, physical, and administrative security measures to protect against loss, misuse, unauthorized access, disclosure, or alteration.

**How does Zelle collect my personal information?**

We collect your personal information, for example, when you:

- provide account information, including your debit card information
- use your debit card
- tell us who receives the money, tell us where to send the money<sup>1</sup>, or when you receive money through the Zelle App
- give us your contact information

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

**Why can't I limit all sharing?**

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

### Definitions

**Affiliates**

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Our affiliates include Early Warning Services, LLC, clearXchange LLC, Authenticate, LLC, Early Warning Information Solutions, LLC*

**Nonaffiliates**

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *Nonaffiliates we share with can include analytics companies, customer service providers, banks and financial institutions.*

**Joint marketing**

A formal agreement including agreed upon rules and protocols between nonaffiliated financial companies that together market financial products or services to you.

- *Zelle® does not share personal information with nonaffiliated financial companies for joint marketing.*

<sup>1</sup> Zelle does not send nor initiate the transfer of money. Zelle provides information to your financial institution, based upon the information you provide, regarding where to send the money.

## Other important information

**Special Notice for California Residents:** In order to comply with California law, the following applies if your account has a California mailing address.

### **Restrict Nonpublic Personal Information Shared with Non-affiliated Third Parties**

Even if you do not make the privacy choice set above, we will not share information that we have about you with non-affiliated third parties, except for Everyday Business Purposes (defined below). For purposes of this notice, "Everyday Business Purposes" means any of the purposes set forth in Cal. Fin. Code § 4056. Including but not limited to:

1. When personal information is necessary to effect, administer, or enforce a transaction requested or authorized by you, or in connection with servicing or processing a financial product or service requested or authorized by you, or in connection with maintaining or servicing your account with us, or with another entity as part of a private label credit card program or other extension of credit on behalf of that entity, or in connection with a proposed or actual securitization or secondary market sale, including sales of servicing rights, or similar transactions related to a transaction of the consumer.
2. When your personal information is released with your consent or at your direction; and/or
3. When your personal information is released to:
  - a. Protect the confidentiality or security of your records with us; and/or
  - b. Protect against fraud, identity theft, unauthorized transactions, claims, or other liability.

### **Restrict Nonpublic Personal Information Shared with Zelle Family**

We will not share nonpublic personal information about you within our family of companies other than for our Everyday Business Purposes unless we first provide you with further privacy choices.

### **Restrict Nonpublic Personal Information Shared with Joint Marketing Partners**

We will not share information about you with joint marketing partners unless we first provided you with further privacy choices.

### **Special Notice to Vermont Residents:**

- We will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures.
- Additional information concerning our privacy policies can be found at <https://www.zellepay.com/privacy-policy>. You may also email us at [privacyoffice@earlywarning.com](mailto:privacyoffice@earlywarning.com) or write us at Early Warning Services, LLC. Attn: Privacy Office, 16552 N. 90<sup>th</sup> Street, Scottsdale, AZ 85260.