

Updated: January 25, 2021

Summary of changes: We previously had one Privacy Notice that addressed our website, zellepay.com, and the Zelle® app. On January 21, 2021, we created two separate Privacy Notices and we updated our Privacy Notices to make them easier to read. We have not made any material changes to the data we collect or how we use that data.

This Privacy Notice applies to visitors of our website, zellepay.com.

If you also use the Zelle® app, please [click here](#) to read the *Zelle App Privacy Notice*.

Thank you for visiting zellepay.com! We take your privacy seriously and we want you to be fully informed about how you can be in control of your personal information.

This Privacy Notice applies to our website, zellepay.com (referred to as the “Website” from here on out). It describes the personal information we collect, how it’s used and shared, and the choices you can make. We strive for transparency but if anything remains unclear, do not hesitate to contact us at the email address below with any questions or feedback you may have.

To make this Privacy Notice easy to find, we make it available in the footer section of all zellepay.com pages. You can also call 844.212.9102 (Monday through Friday, 8am to 5pm ET, excluding New Year’s Day, Thanksgiving, and Christmas) to request a copy be sent to you by U.S. mail.

By using this Website, you expressly consent to our collection, use, disclosure, and retention of your personal information as described in this Privacy Notice. In other words, please do not use this Website if you do not agree with our Privacy Notice.

What do you want to learn more about?

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Zellepay.com Website Privacy Notice

1. When this Privacy Notice applies

This Privacy Notice applies to our website, zellepay.com (referred to as the "Website" from here on out).

If you also use the Zelle® app, please [click here to read the Zelle App Privacy Notice](#).

2. What personal information is

“Personal information” means information that identifies or can be used to identify you directly or indirectly. Examples of personal information include, but are not limited to, first and last name, email address, telephone number, IP address.

3. Personal information we’ve collected and shared

If you’ve visited our Website in the past 12 months, we may have collected and shared the following categories of personal information about you for a business purpose(s):

Categories of personal information we’ve collected in the last 12 months on the Website:	Categories of sources from which information is collected:	Business purpose(s) for collection, use, and sharing:	Shared for business purpose(s) to the following categories of third parties:	Sold to the following categories of third parties:
Personal and online identifiers (e.g., name, email address, IP address or unique online identifiers)	All categories listed below in Section 4.	All purposes listed below in Section 5.	All categories listed below in Section 6.	None

Categories of personal information we've collected in the last 12 months on the Website:	Categories of sources from which information is collected:	Business purpose(s) for collection, use, and sharing:	Shared for business purpose(s) to the following categories of third parties:	Sold to the following categories of third parties:
Certain personal information (e.g., address, telephone number)	All categories listed below in Section 4.	All purposes listed below in Section 5.	All categories listed below in Section 6.	None
Transactions information (i.e., reports of scams made through our Website by consumers using the <i>Zelle</i> app)	All categories listed below in Section 4.	All purposes listed below in Section 5.	All categories listed below in Section 6.	None
Internet or other electronic network activity information e.g., browsing history, search history, interactions	All categories listed below in Section 4.	All purposes listed below in Section 5.	All categories listed below in Section 6.	None

Categories of personal information we've collected in the last 12 months on the Website:	Categories of sources from which information is collected:	Business purpose(s) for collection, use, and sharing:	Shared for business purpose(s) to the following categories of third parties:	Sold to the following categories of third parties:
with our Website)				

4. How we collect personal information

When you visit our Website, we collect:

- a. website usage information automatically from the device you are using to access our Website; and
- b. personal information that you give us if you submit a form on our Website.

5. How we use personal information

When you visit our Website, we collect, use, and share personal information for the following business reasons:

- a. to prevent, detect, and protect against security incidents, fraud, and prohibited or illegal activities;
- b. to perform services (for us or our service providers) such as providing customer service and website analytics;
- c. for internal research for technological improvement;
- d. for internal operations;
- e. to enforce our terms and conditions;

- f. to debug to identify and repair errors that impair existing intended functionality;
- g. for business partner inquiries (B2B), to respond to your requests made through our Website, send you information about our products and services that we believe you will find beneficial, and to comply with your stated communication preferences;
- h. to create, develop, operate, deliver, maintain, and improve our Website;
- i. for legal compliance;
- j. to respond to your requests and comply with your stated communication preferences;
- k. to provide you with a safe, efficient, and customized experience; and
- l. to provide other services you request.

6. Who we share personal information with

We may share personal information with the following categories of third parties for the business purposes we described above in Section 5.

- a. the Early Warning Services, LLC corporate family (Early Warning is the parent company of *Zelle*);
- b. our Network Financial Institutions (if you report a scam to us through our Website, we will share that information with the recipient's bank or credit union);
- c. our service providers (e.g., companies that help us operate our website and provide customer service);
- d. law enforcement, government agencies, and other authorized third parties (we may be required by law to share information for legal reasons);
- e. new owners (in the event we plan to merge with or be acquired by that business entity); and
- f. other entities with your consent.

In the past 12 months, we have not shared personal information in a manner that we consider a "sale," including information of minors under the age of 16. For

purposes of this Privacy Notice, “sale” means the disclosure of personal information to a third-party for monetary or other valuable consideration.

7. How we use cookies and tracking technologies

Like most websites, we use “cookies” and similar technologies (e.g., pixels and web beacons) to operate and improve our Website.

Cookies are small data files stored on your browser or device. They may be served by the entity that operates the website you are visiting (“first-party cookies”) or by other companies (“third-party cookies”). For example, we partner with third-party analytics service providers, like Google, to help us understand how our Website is being used so we can make the Website better for you.

We use the following types of cookies on our Website:

- a. **Strictly Necessary Cookies** – These cookies are needed to provide basic functions on the Website. 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 for cookies that are strictly necessary.
- b. **Analytics and Performance-Related Cookies** – We may use these cookies to assess the performance of our Website, including as part of our analytic practices to improve the services offered through the Website. These cookies may be used to prevent fraudulent activity and improve security. You may disable these cookies if you’d like.
- c. **Functionality-Related Cookies** – We may use these cookies to tell us, for example, whether you have visited the Website before or if you are a new visitor and to help us identify the features in which you may have the greatest interest. You may disable these cookies if you’d like.

To change your cookie preferences/disable certain cookies, .

To learn more about our use of cookies and similar technologies, click here to [read our full Cookies and Tracking Policy](#).

8. Minors' privacy

Our Website is not intended for children under the age of 13. We do not knowingly solicit or collect information from any individuals under the age of 13. We also do not sell information that is collected from our Website so therefore we have not sold information about minors. **For information about the Children's Online Privacy Protection Act (COPPA), visit the FTC website: www.ftc.gov.**

9. Your choices and rights

Website Cookies

To change your cookie preferences/disable certain cookies, [click here](#).

Please note, you will need to reset your preferences if you later visit our Website from a different device or browser or if you clear your cookies.

Network Participants/ Business Partners (B2B)

If you've previously expressed interest in our products and services for your financial institution and you no longer wish to receive marketing communications from us, you can indicate your communication preference within the direct communication from us (e.g., using the unsubscribe link in the email you receive from us) or by emailing marketing@earlywarning.com. Please allow us a reasonable period of time in order to satisfy your request, as some communications may already be in process.

Zelle App Users

This Privacy Notice applies to visitors of our Website, zellepay.com. If you also use

the *Zelle* app, please click here to read the *Zelle* App Privacy Notice. We will not discriminate against you for exercising your choices and rights.

10. Our data retention practices

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

11. Notice to California residents

How California Residents Can Request a List of Third Parties that Received Personal Information: California residents may request a list of what personal information (if any) we've shared with third parties for their own direct marketing purposes in the preceding calendar year and the names and addresses of those third parties.

We do not share personal information with third parties for their direct marketing purposes. Therefore, we have not shared personal information with third parties for direct marketing purposes within the last 12 months.

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.

12. Links to third party websites

Our Website may contain links to other third-party websites, such as our Network Financial Institutions and regulatory bodies such as the Federal Trade Commission (FTC) and the Consumer Financial Protection Bureau (CFPB). When you leave our Website and visit those websites, you are bound by the privacy notices of those websites. We are not responsible for the privacy practices of these third-party websites, which are governed by their own privacy notices and practices.

13. How we protect personal information

To help us protect your personal information, 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.

14. Where personal information is stored

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.

15. Changes to this Privacy Notice

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

16. How to contact us

If your questions are not answered in this Privacy Notice, 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.