

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 25, 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 users of the *Zelle* app. If you use *Zelle* through your mobile banking app or online banking, please refer to your financial institution’s privacy notice.

As a visitor to our website, zellepay.com, our Website Privacy Notice also applies. [Click here to learn more.](#)

Thank you for using Zelle®. 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 the *Zelle* app (referred to as the “App” 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 through the App and on the zellepay.com website. You may also call 844.212.9102 (Monday – Friday from 10am-5pm ET, excluding Thanksgiving, Christmas Day, and New Year’s Day.) to request a copy by US mail.

By using the Zelle app, 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 the App if you do not agree with our Privacy Notice.

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Zelle® App Privacy Notice

1. When this Privacy Notice applies

This Privacy Notice applies to our Zelle® app (referred to as the “App” from here on out).

If you use *Zelle* through your mobile banking app or online banking, please refer to your financial institution’s privacy notice.

As a visitor to our website, zellepay.com, our Website Privacy Notice also applies. Please [click here to learn more](#).

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, device information, bank account information.

3. Personal information we’ve collected and shared

If you’ve used the App 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:	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, postal address, IP address or unique identifiers)	All categories listed below in Section 4.	All purposes listed below in Section 5.	All categories listed below in Section 6.	None
Certain personal information (e.g., address, telephone number, financial account numbers, other financial information)	All categories listed below in Section 4.	All purposes listed below in Section 5.	All categories listed below in Section 6.	None
Transaction information (e.g., records of transactions made through <i>Zelle</i> when you use the 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., your interactions with the App)	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:	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:
Biometric information (i.e., call recordings if you call <i>Zelle</i> Customer Support for help with the App)	All categories listed below in Section 4.	All purposes listed below in Section 5.	All categories listed below in Section 6.	None
Geolocation information	All categories listed below in Section 4.	All purposes listed below in Section 5.	All categories listed below in Section 6.	None
Other information about you that is linked to the personal information above (e.g., information you associate with your <i>Zelle</i> profile like a profile photo)	All categories listed below in Section 4.	All purposes listed below in Section 5.	All categories listed below in Section 6.	None

4. How we collect personal information

When you use the App, we collect personal information from:

- a. you directly when you provide it (e.g., when you enroll in the App, you provide your information to us);
- b. your device (e.g., your mobile device shares the name of your device when you use the App);
- c. our bank and credit union partners (e.g., when you receive money from one of their customers, they share information with us about the transaction); and
- d. our service providers (e.g., we use service providers to help us verify your identity when you enroll in the App).

5. How we use personal information

When you use the App, 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 account servicing, providing customer service, fulfilling transactions, verifying consumer information, providing analytic services;
- c. for internal research for technological improvement;
- d. for internal operations;
- e. to verify the existence of your financial account;
- f. to enforce our terms and conditions;
- g. to research and resolve issues related to transactions you sent or received;
- h. to debug to identify and repair errors that impair existing intended functionality;
- i. to facilitate transactions, including enabling our bank and credit union partners to complete money transfers between their customers and you;

- j. to notify you, by text or email, of a pending money transfer or a request for payment;
- k. to facilitate your enrollment and resolve issues relating to your enrollment;
- l. to verify your identity;
- m. to verify changes you've made to your personal information;
- n. to create and deliver marketing communications to you about *Zelle*;
- o. to create, develop, operate, deliver, maintain, and improve our products and services;
- p. for legal compliance;
- q. to respond to your requests and comply with your stated communication preferences;
- r. to provide you with a safe, efficient, and customized experience;
- s. for authentication;
- t. to provide other services you request; and
- u. for other one-time uses.

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. other *Zelle* users (e.g., When another user sends you a payment, we may share your name (from your *Zelle* profile) and profile picture (if you have one) with the other user to ensure the other user intends to send a payment to you. We do not share your bank account information/debit card information with other *Zelle* users.);
- b. the Early Warning Services, LLC corporate family (Early Warning is the parent company of *Zelle*);
- c. our bank and credit union partners (when you send or receive money using the App, we share information with them to facilitate the transaction);
- d. our service providers (e.g., companies that help us provide the *Zelle* service);

- e. law enforcement, government agencies, and other authorized third parties (we may be required by law to share information for legal reasons);
- 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; and
- h. other entities with your consent.

7. Minors' privacy

The Zelle Network® [User Service Agreement](#) defines eligibility requirements to use the App.

Our App is not intended for children under the age of 13. It does not knowingly collect personal information from children. We do not sell personal information collected from the App. Therefore, we would not sell information about minors.

For information about the Children's Online Privacy Protection Act (COPPA), visit the FTC website: www.ftc.gov.

8. Your choices

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

To opt out of marketing communications from us about *Zelle*, use the options in the communications we send (i.e. click on the unsubscribe link) or send an email request to requestoptout@earlywarning.com.

You may not opt-out of administrative emails (e.g., 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 New Year's Day, Thanksgiving and Christmas). However, doing so will immediately terminate your ability to use the service.

9. Updating your personal information

You can update your personal information at any time by accessing your profile in the App. You can update your User profile and registration information, including your debit card information and email addresses.

If your mobile telephone number has changed, you will need to call customer service for assistance with your profile. Customer service representatives can be reached at 844.428.8542 (8am to midnight EST, excluding New Year's Day, Thanksgiving and Christmas).

Keeping your profile information up-to-date is very important. If this information is incomplete, inaccurate, or not current, please update your information by accessing your profile in the App.

10. Your rights regarding your personal information

We provide the *Zelle* service pursuant to the Graham-Leach-Bliley Act ("GLBA") and are exempted from certain privacy and data security laws (e.g., the California Consumer Privacy Act (CCPA)). Even so, we honor your data privacy rights, regardless of whether we are obligated by law and regardless of your state of residence.

- You have the **right to 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 own direct marketing purposes. Therefore, we have not shared personal information with third parties for direct marketing purposes within the last 12 months.
- You have the **right to know** the categories and specific pieces of personal information we collect, use, share, and sell about you, our business purposes for collecting personal information, the categories of third parties that we've shared personal information with, the categories of sources that we've collected personal information from, whether we've shared or sold personal information for a business purpose in the preceding 12 months, and the categories of third parties with which we've shared or sold personal information.
 - In the past 12 months, we have not shared personal information from the App in a manner that we consider a "sale." For purposes of this Privacy Notice, "sale" means the disclosure of personal information to a third-party for monetary or other valuable consideration.
- You have the **right to request that we delete** your personal information.
 - Under certain circumstances, we may not be able to delete your information because we have a legal obligation or other reason that we must retain it.
- You have the **right to opt out of the sale** of your personal information.
 - As stated above, we do not sell personal information that we've collected from the App.
- You have the **right to be free from discrimination** for exercising your privacy rights.
 - We will not discriminate against you for exercising your choices and rights.
- You have the **right to access your personal information** that we've collected about in the proceeding 12 months following your request.

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. We may

decline your request if we cannot verify your identity or confirm the personal information that we maintain belongs to you. If we cannot honor your request, we will let you know.

11. How to exercise your data privacy rights

Please submit your request and the required verifying information by either:

1. [Clicking here to submit your request online](#) using your *Zelle* login credentials; or
2. Calling us at 844.212.9102 (Monday – Friday from 10am-5pm ET, excluding Thanksgiving, Christmas Day, and New Year’s Day).

We will acknowledge receipt of your request and let you know how long we expect it will take us to complete your request (typically 45 days or less).

12. How we verify your request

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.

We may need to request additional information from you to verify your identity or to 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.

13. Authorized agents

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 – Friday from 10am-5pm ET, excluding Thanksgiving, Christmas Day, and New Year’s Day).

14. 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.

15. Links to third-party websites

Our App may contain links to other third-party websites, such as links to our bank and credit union partners’ websites. When you leave our App 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. 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. 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 App.

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.

17. 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.

18. 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 our website or in the App. You should check this Privacy Notice frequently for updates.

19. 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.