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 we 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 how personal information we collect, how it’s used and disclosed, 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 if 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 844.428.8542 (Sunday through Saturday, 10am to 10pm ET, excluding New Year’s Day, Independence Day, Thanksgiving, and Christmas) to request a copy 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 this Privacy Notice.

What do you want to learn more about?

1. When this Privacy Notice applies
2. What personal information is
3. Personal information we’ve collected, used, and/or disclosed
4. How we collect personal information
5. How we use personal information
6. Who we disclose personal information to
7. How we use cookies and tracking technologies
8. Minors’ privacy
9. Your choices
10. B2B California residents’ privacy rights
11. Our data retention practices
12. Links to third party websites
13. How we protect personal information
14. Where personal information is stored
15. Changes to this Privacy Notice
16. How to contact us
“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, and other identifiers linked or reasonably linked to you.

Personal information does not include information obtained from public sources or information that is made available by federal, state, or local governments. Personal information also does not include deidentified or aggregate information.

3. Personal information we’ve collected, used, and/or disclosed

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

<table>
<thead>
<tr>
<th>Categories of personal information we’ve collected in the last 12 months on the Website:</th>
<th>Categories of sources from which personal information is collected:</th>
<th>Business purpose(s) for collection, use, and disclosure:</th>
<th>Disclosed for business purpose(s) to the following categories of third parties:</th>
<th>Sold or shared to the following categories of third parties:</th>
<th>Length of time personal info is intended to be retained: (unless subject to a legal hold)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personal and online identifiers (e.g., name, email address, IP address, unique online identifiers)</td>
<td>• All categories listed below in Section 4.</td>
<td>• All purposes listed below in Section 5.</td>
<td>• All categories listed below in Section 6.</td>
<td>None</td>
<td>Up to 2 months</td>
</tr>
<tr>
<td>Certain identifying personal information (e.g., address, telephone number)</td>
<td>• Directly from you when you use a form on the Website to request assistance.</td>
<td>• All purposes listed below in Section 5.</td>
<td>• All categories listed below in Section 6.</td>
<td>None</td>
<td>Up to 5 months</td>
</tr>
<tr>
<td>Transaction information (i.e., reports of scams made through our Website by consumers using the Zelle® app)</td>
<td>• Directly from you when you use a form on the Website to request assistance.</td>
<td>• All purposes listed below in Section 5.</td>
<td>• All categories listed below in Section 6.</td>
<td>None</td>
<td>Up to 5 months</td>
</tr>
<tr>
<td>Internet or other electronic network activity information (e.g., browsing history, search history, interactions with our Website)</td>
<td>Your device when you use the Website.</td>
<td>• All purposes listed below in Section 5.</td>
<td>• All categories listed below in Section 6.</td>
<td>None</td>
<td>Up to 2 months</td>
</tr>
</tbody>
</table>

4. How we collect personal information

a. Passively from your device: We collect website usage information automatically from the device you are using to access our Website; and
b. Directly from you: We collect 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 disclose personal information for the following business purposes:

a. to prevent, detect, and protect against security incidents, fraud, and prohibited or illegal activities;
b. to undertake activities to verify or maintain the quality or safety of our services;
c. to perform services (for us or our service providers) such as providing customer service and website analytics;
d. for internal research for technological development, demonstration, and improvement;
e. for internal operations;
f. to enforce our terms and conditions;
g. to debug, identify and repair errors that impair existing intended functionality;
h. for business 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;
i. to create, develop, operate, deliver, maintain, and improve our Website;
j. for legal compliance;
k. to respond to your requests and comply with your stated communication preferences;
l. to provide you with a safe, efficient, and customized experience; and
6. Who we disclose personal information to

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

a. the Early Warning Services, LLC corporate family (Early Warning is the network operator of Zelle®);
b. our Network Financial Institutions (e.g., 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 disclose information for legal reasons);
e. existing owners and their employees and agents;
f. new owners (in the event we plan to merge with or be acquired by that business entity); and
g. other entities with your consent.

In the past 12 months, we have not sold or shared personal information from the Website. For purposes of this Notice, “sale” means the disclosure of personal information to a third-party for monetary or other valuable consideration and “share” means the disclosure of personal information to a third party for cross-context behavior advertising.

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:

<table>
<thead>
<tr>
<th>Cookie Type</th>
<th>Description</th>
<th>If disabled</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strictly Necessary Cookies</td>
<td>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.</td>
<td>N/A – These cookies are required to operate our Website. Without them, the Website could not function properly.</td>
</tr>
<tr>
<td>Analytics and Performance-Related Cookies</td>
<td>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.</td>
<td>Without these cookies, we can't tell what content most valued by our Website visitors and we can't learn how often unique visitors return to our Website.</td>
</tr>
<tr>
<td>Functionality-Related Cookies</td>
<td>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.</td>
<td>Without these cookies, we won't be able to remember you from session to session and some of the Website services may not function properly for you.</td>
</tr>
</tbody>
</table>

How We Respond to Do Not Track Signals for California Residents: California Business & Professions Code Sect 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 there is currently no uniform technological standard to which we can adhere. We continue to review new technologies and may adopt a standard once one is created.

To learn more about our use of cookies and similar technologies, click [here](#) to read our full Cookies and Tracking Technologies 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 or share information that is collected from our Website for purposes other than to provide other services you request.
Protection Act (COPPA), visit the FTC website: www.ftc.gov.

9. Your choices

**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 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 receive marketing communications from us, you can indicate your direct marketing preference through 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.

10. B2B California residents’ privacy rights

If you are a California resident and you’ve interacted with us on behalf of your company/business (e.g., you’ve expressed interest in our products/services for your financial institution), the following data privacy rights are available to you:

Note: If you use the Zelle® app, please see Section 10 in the Zelle® App Privacy Notice for your privacy rights.

<table>
<thead>
<tr>
<th>You have the right to...</th>
<th>How?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Third party direct marketing</strong></td>
<td>We do not share personal information with their own direct marketing purposes. There is no shared personal information with third parties for direct marketing purposes within the last 12 months.</td>
</tr>
<tr>
<td>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.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Be informed</strong></th>
<th>Review this Privacy Notice in its entirety to the personal information we collect, why we collect it, the sources from which we collect it, and who we may disclose it to.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Know the categories and specific pieces of personal information we collected about you, our business purposes for collecting personal information, the categories of sources that we’ve collected personal information from, the categories of third parties that we’ve disclosed personal information to, whether we’ve sold or shared personal information to a third party in the preceding 12 months, and the categories of third parties with which we’ve sold or shared personal information.</td>
<td></td>
</tr>
</tbody>
</table>

CA Network Participants/ Business Partner:

Send an email to privacyoffice@earlywarning.com with “California Data Privacy Rights Request” in the subject line. In the body of the email, please include:

- Your first name
- Your last name
- The name of your business/company
- Your business email address or business number
- Your business relationship with us (e.g., service provider)
- Your request (access, correct, or delete information)

Note: In the past 12 months, we have not sold personal information from the Website. “Sale” means the disclosure of personal information to a third-party other than in context of cross-context behavioral advertising.
| Correct inaccurate data | Request that we correct inaccurate personal information that we maintain about you. | CA Network Participants/ Business Partners:  
Send an email to privacyoffice@earlywarnin  
“California Data Privacy Rights Request” in  
In the body of the email, please include:  
- Your first name  
- Your last name  
- The name of your business/company  
- Your business email address or business number  
- Your business relationship with us (bus. service provider)  
- Your request (access, correct, or delete information)  
- Note: To the extent required by, and in applicable law, we will use commercially reasonable efforts to correct your personal information. If by you, considering the nature and the circumstances, we may not be able to do so because we have a legal obligation or other reason in which we must retain information because we have a legal obligation or other reason that we must retain the data, to comply with law. |
| --- | --- | --- |
| Delete data | Request that we delete your personal information. | CA Network Participants/ Business Partners:  
Send an email to privacyoffice@earlywarnin  
“California Data Privacy Rights Request” in  
In the body of the email, please include:  
- Your first name  
- Your last name  
- The name of your business/company  
- Your business email address or business number  
- Your business relationship with us (business service provider)  
- Your request (access, correct, or delete information)  
- Note: 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 the information. |
| Limit data | Limit the use of sensitive personal information. | Our Website does not collect sensitive personal information. |
| Opt out | Opt out of the sale or sharing of your personal information. | As stated above, we do not sell or share personal information that we've collected from the CA Network Participants. |
| Free from discrimination | Be free from discrimination for exercising your privacy rights | We will not discriminate against you for exercising your privacy choices and rights. |
| Access | Access your personal information that we’ve collected about you in the preceding 12 months following your request. | CA Network Participants/ Business Partners:  
Send an email to privacyoffice@earlywarnin  
“California Data Privacy Rights Request” in  
In the body of the email, please include:  
- Your first name  
- Your last name  
- The name of your business/company  
- Your business email address or business number  
- Your business relationship with us (bus. service provider)  
- Your request (access, correct, or delete information)  
- Note: You may request that we disclose information beyond the 12-month period if information collected on or after January 1, 2020, unless doing so proves impossible or disproportionate effort. |
Please note the above-listed rights are subject to certain exceptions. For instance, we cannot disclose or permit to specific pieces of personal information if the disclosure or access would present a certain level of risk to the: 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 cannot honor your request, we will let you know.

Upon receipt of your “California Data Privacy Rights Request” email, we will acknowledge receipt of your request and you know how long we expect it will take to complete your request (typically 45 days or less for most requests. When you make a request, we will attempt to verify that you are who you say you are. For example, we will attempt to match information that you provide in making your request with information that we have on file. We may need request additional information from you to verify your identity or to understand the scope of your request, although will not be required to create an account with us to submit a request or have it fulfilled.

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 may be made by sending an email to privacyoffice@earlywarning.com.

11. 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. See Section 3 for more information.

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 policies.

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 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 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 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 process 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, to us at Early Warning Services, LLC., Attn: Privacy Office, 5801 N Pima Rd, Scottsdale, AZ 85250.

If you need assistance with the Zelle® app, please contact Consumer Services at https://www.zellepay.com/contact.