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 we collect, use, disclose, and 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 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 feedback.

To make this Privacy Notice easy to find, we make it available through the App and on the zellepay.com website. You can also call 844.428.8542 (Sunday - Saturday, 10am to 10pm ET, excluding New Year’s Day, Independence Day, Thanksgiving, and Christmas) 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 to 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. Minors’ privacy
8. Your choices
9. Updating your personal information
10. Your rights regarding your personal information
11. How to exercise your data privacy rights
12. How we verify your request
13. Authorized agents
14. Our data retention practices
15. Links to third-party websites
16. How we protect personal information
17. Where personal information is stored
18. Changes to this Privacy Notice
19. How to contact us

Zelle® App Privacy Notice

1. When this Privacy Notice applies

This Privacy Notice applies to the 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. Personal information includes, but are not limited to, first and last name, email address, telephone number, device information, bank account information.

Personal information does not include information obtained from public sources or information that is made 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 used the App 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:</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 information to be retained subject to a request:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personal and online identifiers (e.g., name, email address, postal address, IP address, unique 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>4 year profile deactivation</td>
</tr>
<tr>
<td>Certain identifying personal information (e.g., address, telephone number, financial account numbers, other financial information)</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 App profile deactivation</td>
</tr>
<tr>
<td>Transaction information (e.g., records of transactions made through Zelle® when you use the App)</td>
<td>All categories listed below in Section 4.</td>
<td>All purposes listed below in Section 5.</td>
<td>Early Warning Services, LLC</td>
<td>None</td>
<td>5 years</td>
</tr>
<tr>
<td>Internet or other electronic network activity information (e.g., your interactions with the App)</td>
<td>Your device when you use the App.</td>
<td>All purposes listed below in Section 5.</td>
<td>Early Warning Services, LLC</td>
<td>None</td>
<td>4 year profile deactivation</td>
</tr>
</tbody>
</table>
### Geolocation information

<table>
<thead>
<tr>
<th>Purpose</th>
<th>Device</th>
<th>All purposes listed below in Section 5.</th>
<th>None</th>
<th>4 year profile deactivated</th>
</tr>
</thead>
<tbody>
<tr>
<td>All purposes listed below in Section 5.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Sensitive personal information (i.e., precise geolocation)

<table>
<thead>
<tr>
<th>Purpose</th>
<th>Device</th>
<th>All purposes listed below in Section 5.</th>
<th>None</th>
<th>4 year profile deactivated</th>
</tr>
</thead>
<tbody>
<tr>
<td>All purposes listed below in Section 5.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Other information about you that is linked to the personal information above (e.g., information you associate with your Zelle® profile like a profile photo or your contact/recipient list, call recordings if you call Zelle Customer Support)

<table>
<thead>
<tr>
<th>Purpose</th>
<th>All categories listed below in Section 4.</th>
<th>All purposes listed below in Section 5.</th>
<th>None</th>
<th>4 year profile deactivated</th>
</tr>
</thead>
</table>

#### 4. How we collect personal information

We collect personal information when you use the App, including:

- **a. Directly from you:** We collect personal information when you provide it to us (e.g., when you enroll in the Zelle® service).
- **b. Through your use of the App:** We collect personal information about you when you access or use the App (e.g., when you send or receive money using the App).
- **c. Passively from your device:** We collect technical data about your device when you use the App (e.g., you device shares your Unique Device ID and name of your device when you use the App).
- **d. From our bank and credit union partners:** When you send or receive money from one of their customers, we collect information about the transaction.
- **e. From our service providers:** We work with service providers that provide us with personal information (e.g., service providers that help us verify your identity when you enroll in the Zelle® service).

#### 5. How we use personal information

When you use the App, 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 account servicing, providing customer service transactions, verifying your information, providing analytic services;**
- **d. for internal research for technological development, demonstration, and improvement;**
- **e. for internal operations;**
- **f. to verify the existence of your financial account;**
- **g. to enforce our terms and conditions;**
- **h. to research and resolve issues related to transactions you sent or received;**
- **i. to debug, identify, and repair errors that impair existing intended functionality;**
j. to facilitate transactions, including enabling our bank and credit union partners to complete money transfers between their customers and you;
k. to notify you by push notification, text, or email, of a pending money transfer or a request for payment;
l. to facilitate your enrollment and resolve issues relating to your enrollment;
m. to verify your identity;
n. to verify changes you’ve made to your personal information;
o. to create and deliver marketing communications to you about Zelle®;
p. to create, develop, operate, deliver, maintain, and improve our products and services;
q. for legal compliance;
r. to respond to your requests and comply with your stated communication preferences;
s. to provide you with a safe, efficient, and customized experience;
t. for authentication;
u. to provide other services you request; and
v. for other one-time uses.

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. other Zelle® users (e.g., when another user sends you a payment, we may disclose your name (from your profile) and profile picture (if you have one) with the other user to ensure the other user intends to send money to you. We do not disclose your bank account information/debit card information with other Zelle® users);
b. the Early Warning Services, LLC corporate family (Early Warning is the network operator of Zelle®);
c. our bank and credit union partners (e.g., when you send or receive money using the App, we disclose in confidence 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 disclose your information);
f. existing owners and their employees and agents;
g. new owners (in the event we plan to merge with or be acquired by that business entity); and
h. other entities with your consent.

7. Minors’ privacy

The ZelleNetwork® User Service Agreement defines eligibility requirements to use the App. Our App is not intended for children under the age of 18.

We do not knowingly collect personal information from children. We do not sell or share personal information from the App to third parties. Therefore, we would not sell or share information about children.

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 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 or 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 profile.

You may request to cancel your profile and enrollment with Zelle® by speaking to a customer service representative at 844.428.8542. We are open 7 days a week from 10am to 10pm ET, excluding New Year’s Day, Independence Day, Thanksgiving and Christmas. If you use the Zelle® App on an iOS device, you may also close your profile by selecting “Delete Account” in the app settings on your device. However, doing so will immediately terminate your ability to use the service. Please note that simply deleting the App from your device without selecting “Delete Account” (via the app settings) will not result in your Zelle® profile being closed and deleted. If you only delete the App from your iOS device (without changing the App’s settings), you will remain a registered user and we will retain your data per our data retention policies.

9. Updating your personal information

You can update your personal information at any time by accessing your profile in the App. You can update contact information, 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 you.

Customer service representatives can be reached at 844.428.8542 (7 days a week from 10am-10pm EST, excl. Year’s Day, Independence Day, Thanksgiving and Christmas).

Keeping your profile information up-to-date is very important. If this information is incomplete, inaccurate, or 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 laws. Even so, we honor the following data privacy rights, regardless of whether we are obligated by law.

<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>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>
</tr>
<tr>
<td><strong>Be informed</strong></td>
<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>
</tr>
<tr>
<td><strong>Correct inaccurate data</strong></td>
<td>Request that we correct inaccurate personal information that we maintain about you.</td>
</tr>
</tbody>
</table>

Note: In the past 12 months, we have not sold personal information from the App. For purposes of this Privacy Notice, “sale” means the disclosure of personal information to a third-party for monetary or valuable consideration and “share” means the disclosure of personal information to a third-party for a commercial purpose.

Note: To the extent required by, and in accordance with, applicable law, we will use commercially reasonable efforts to correct your personal information by you, considering the nature and the purpose for maintaining your personal information. Under certain circumstances, we may not be able to correct your personal information because we have a legal obligation to retain it in its current form (e.g., the nature of the data, the source of the data, the purpose for maintaining the data).
| Delete data | Request that we delete your personal information. | If you use the Zelle® app on an iOS device, you request to delete your data and close your profile by selecting “Delete Account” in the app’s settings. However, doing so will immediately terminate your ability to use the service. See Section 8 for information. Otherwise, to exercise this right, see Section 11 for instructions. Note: Under certain circumstances, we may retain your information because we have an obligation or other reason that we must retain. |
| Limit data | Limit the use of sensitive personal information. | We do not use or disclose sensitive personal information for any purposes other than what is described in our Privacy Notice. As stated above, if you do not agree with the Privacy Notice, please do not use the App. |
| 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 App. |
| 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. | To exercise this right, see Section 11 for instructions. Note: You may request that we disclose the information beyond the 12-month period for information collected on or after January 1, 2019, if doing so proves impossible or would involve disproportionate effort. |
| Appeal | Appeal if we decline to act on any of the above requests you’ve made | To exercise this right, call us at 844.212.9102 (Monday through Friday, 8am to 5pm AZ, excluding federal holidays.) |

Please note the above-listed rights are subject to certain exceptions. For instance, we cannot disclose or provide access to specific pieces of personal information if the disclosure or access would present a certain level of risk to the personal information, your account with us or the security of our systems or networks. We may decline 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® App login credentials; or
2. Calling us at 844.212.9102 (Monday through Friday, 8am to 5pm AZ, excluding federal holidays) to submit your request.

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 for most requests.).

12. How we verify your request

For requests made online, at a minimum, your identity will be verified through your existing Zelle® password 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.
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 agents may be made by phone at 844.212.9102 (Monday – Friday from 8am-5pm AZ, excluding federal holidays).

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. See Section 3 for more information.

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 notices of those websites. We are not responsible for the privacy practices of these third-party websites, which are governed by their own privacy 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 include data encryption, physical access controls to our data centers and information access authorization controls. 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 with the App.

It is your responsibility to make sure that your personal information is accurate and that your password(s) and 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 utilize a network of computers, cloud-based services, and other infrastructure and information technology that are located 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 use your 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.co or contact 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/cc

Zelle® Mobile App Users' Privacy Notice

© 2022 Early Warning Services, LLC. All Rights Reserved. Internal use only. Confidential and proprietary. You may not disclose, copy, or distribute this material for any purpose in any medium without the express written consent of Early Warning Services, LLC.

For the purpose of this document, the following definitions apply: a) the “Company” refers to Early Warning Services, LLC and its subsidiaries, and b) “Employees” refers to regular employees and temporary employees.
FACTS

WHAT DOES ZELLE® DO WITH YOUR PERSONAL INFORMATION?

Why?
Financial companies choose how they share your personal information. Federal law gives consumers the right to limit all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please notice carefully to understand what we do.

What?
The types of personal information we collect and share depend on the product or service you have with us. This includes:

- Social Security number
- Financial account information, including your debit card information
- Account transactions occurring through your use of the Zelle® mobile application (the "Zelle® App")
- Zelle® transaction history, including information about payments requested, sent, and received, occurring through the Zelle® App
- Payment history for transactions made through your use of the Zelle® App
- Checking account information (no longer collected in the Zelle® App as of the date of this notice)
- Account balances (no longer collected in the Zelle® App as of the date of this notice)
- Other nonpublic information collected/transmitted by us in connection with your registration for or use of the Zelle® App, such as your 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 identification on your mobile device)

When you are no longer our customer, we continue to share your information as described in this notice.

How?
All financial companies need to share customers’ personal information to run their everyday business. In the section below, the reasons financial companies can share their customers’ personal information; the reasons Zelle® chooses to share your information; and how you can limit this sharing.

Reasons we can share your personal information | Does Zelle® share? | Can you limit this
--- | --- | ---
For our everyday business purposes—such as to process your transactions, maintain your Zelle® App Profile(s), respond to court orders and legal investigations, or report to credit bureaus. | Yes | No
For administrative purposes—such as to advise you of information regarding your Zelle® App Profile or a transfer you have initiated or received. | Yes | No
For our marketing purposes—to offer our products and services to you | No | We don’t share
For joint marketing of the Zelle® service with other financial companies | No | We don’t share
For our affiliates’ everyday business purposes—information about your transactions and experiences | Yes | No
For our affiliates’ everyday business purposes—information about your creditworthiness | No | We don’t share
For our affiliates to market to you | No | We don’t share
For nonaffiliates to market to you | No | We don’t share

Questions?
Go to [https://www.zellepay.com/privacy-policy](https://www.zellepay.com/privacy-policy). If your questions are not answered online, you may email us at pri**cy**ng.com, or write us at Early Warning Services, LLC. Attn: Privacy Office, 5801 N Pima Rd, Scottsdale, AZ 85250.

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, or make an electronic funds transfer
- use your debit card
- tell us who receives the money, tell us where to send money, 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, Authentify, 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.

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Zelle® does not send nor initiate the transfer of money. Zelle® provides information to your financial institution, based upon the information you provide, directing your financial institution on where to debit or credit money.

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### 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 or write us at Early Warning Services, LLC. Attn: Privacy Office, 5801 N Pima Rd, Scottsdale, AZ 85250.