

Early Warning Services, LLC

Privacy Notice

Last updated: January 1, 2020

Welcome! Thank you for visiting the Early Warning website.

Early Warning (referred to as “Early Warning Services, LLC,” “we,” “our,” or “us”) is a leader in financial data and technology that makes money movement fast, safe and easy. For almost three decades, our identity, authentication and payment solutions have been used during life’s money moments, empowering financial institutions to make decisions, enable payments and prevent fraud.

This privacy notice (“Privacy Notice”) explains our information privacy practices and the choices you can make about the collection, use, disclosure and retention of information you submit or we collect through our website, earlywarning.com (the “Website), and our *Authenticate*® mobile app offered to consumers (collectively, the “Site”). The Site is owned and operated by Early Warning Services, LLC.

To make this Privacy Notice easy to find, we make it available on the earlywarning.com homepage and in the *Authenticate* mobile app. You may also call 844.212.9102 (8am to 5pm ET) to request a copy by US mail.

Contents & Summary

A list summarizing the contents of this Privacy Notice appears below, followed by the full **Privacy Notice**. Should there be any discrepancy between the summary and the full Privacy Notice, the language of the full Privacy Notice governs.

- **Scope and Consent**

By using the Site, you expressly consent to our collection, use, disclosure, and retention of your personal information and other information as described in this Privacy Notice.

Users of the *Authenticate* mobile app are also governed by the End User License Agreement (available in the app).

Do not use the Site if you do not agree to these terms.

- **Personal Information We Collect, Disclose for a Business Purpose, and Sell**

When you use the Site, we collect the following categories of personal information:

- Personal and online identifiers (such as first and last name, email address, or unique online identifiers)
- Certain customer record information (such as address, telephone number, employment history, education)
- Characteristics of protected classifications under California or federal law (such as race, gender or veteran status)
- Internet or other electronic network activity information (such as browsing history, search history, interactions with a website or email)
- Biometric information (such as call recordings)
- Professional or employment-related information
- Education information
- Other information about you that is linked to the personal information above (such as information you associate with your employment application)

See Section 2 for more information.

- **Categories of Sources of Personal Information We Collect**

We collect personal information from the following categories of sources:

- Users of the Site (when accessing or using the Site);
- Users' devices (when accessing or using the Site); and
- Service providers.

See Section 3 for more information.

- **Why We Collect, Use, and Share Information for Business and Commercial Purposes**

We use and disclose the personal information we collect for our commercial and business purposes, including, without limitation:

- Preventing, detecting and protecting against security incidents, fraud and prohibited or illegal activities;
- Performing services (for us or our service providers) such as account servicing, providing customer service, fulfilling transactions, verifying consumer information, providing analytic services;
- Internal research for technological improvement;
- Internal operations;
- To enforce our terms and conditions;
- Debugging;
- To verify your identity and establish you as a registered user of the *Authenticate* mobile app, to provide the service to you, and to resolve issues relating to your registration and use of the service;
- To consider and act upon your application when you apply for a career position with us;
- Verifying changes you have made to your personal information;
- Auditing related to our interactions with you;
- Activities to create, develop, operate, deliver, maintain and improve our products and services;
- Legal compliance;
- For business inquiries, we respond to your requests made through the Website for white papers regarding our products and services, send you information about our products and services that we believe you will find beneficial and to comply with your stated communication preferences;
- Providing you with a safe, efficient, and customized experience;
- Authentication;
- Providing other services you request; and
- Other one-time uses.

[See Section 4 for more information.](#)

- **Recipients of Personal Information**

We may disclose the categories of personal information designated above to the categories of third parties listed below for business purposes:

- a. The Early Warning Services, LLC corporate family;
- b. Our service providers;
- c. Law enforcement, government agencies and other authorized third parties;
- d. New owners (in the event we plan to merge with or be acquired by that business entity); and
- e. Other entities with your consent.

[See Section 5 for more information.](#)

- **Your Choices**

If you do not wish to receive marketing communications regarding our products (for business inquiries), 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.

[See Section 6 for more information.](#)

- **Minors' Right to Opt In**

We do not knowingly collect information from children as set forth above, however if we ever do, we will provide an opt-in before selling any such data of children.

[See Section 7 for more information.](#)

- **Accessing, Reviewing and Updating Personal Information**

If you use the *Authenticate* mobile app, you can access, review, and update your personal information by accessing your profile within the app.

If you have applied for a position with Early Warning, you can update your candidate profile by [logging in here](#).

[See Section 8 for more information.](#)

- **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.

If you are using the *Authenticate* mobile app, information from closed or suspended profiles will only be retained as necessary to comply with law, prevent fraud, assist with investigations, resolve disputes, analyze or troubleshoot programs, enforce our terms and conditions, or take other actions permitted by law.

[See Section 9 for more information.](#)

- [How We Use Cookies and Tracking Technologies](#)

We use tracking technologies (including cookies) to recognize you, protect your privacy, and customize your experience on the Website. We do not sell data collected on the Site for money, but we do use cookies and other tracking technologies. You can opt-out of cookies below in Section 10.

[See Section 10 for more information.](#)

- [Notice to California Residents](#)

If you are a California resident, you may request information about our practices related to disclosing your personal information and how we respond to Do Not Track signals.

See Section 11 for more information.

- [Links to Third Party Websites](#)

We are not responsible for the privacy practices of third-party websites that are linked to or from our Website. Please refer to the privacy notices of those websites for information regarding their privacy practices.

[See Section 12 for more information.](#)

- [Security](#)

To help us protect the privacy of your data, 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.

[See Section 13 for more information.](#)

- **Children's Privacy**

This Website is not intended for children under the age of 13. This Website does not knowingly solicit or collect information from any individuals under the age of 13. **For information about the Children's Online Privacy Protection Act (COPPA), visit the FTC website: www.ftc.gov.**

[See Section 14 for more information.](#)

- **Territorial Scope and Processing**

We are located in the United States. 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. If you create an *Authenticate* mobile app profile, you consent to the collection and/or processing of your personal information and tracking technologies/cookies as described in this Privacy Notice.

[See Section 15 for more information.](#)

- **Notification Regarding Updates to This Privacy Notice**

You agree that we may notify you about material changes to this Privacy Notice by posting notices on the Site.

See Section 16 for more information.

- [Contact Us](#)

Privacy issues are handled by our Privacy Office. For more information about our privacy practices, please continue to our full Privacy Notice below or send an email to privacyoffice@earlywarning.com.

See Section 17 for more information.

Full Privacy Notice

1. Scope and Consent

When you use the Site, you are contracting with Early Warning Services, LLC, located at 16552 N. 90th Street, Scottsdale, AZ 85260. By using the Site, you expressly consent to our collection, use, disclosure, and retention of your personal information as described in this Privacy Notice.

Users of the *Authenticate* mobile app are also governed by the End User License Agreement (available in the app).

Do not use the Site if you do not agree to these terms.

2. Personal Information We Collect, Disclose for a Business Purpose, and Sell

When you use the Site, we collect the categories of personal information about you identified in the chart below. As further set forth in the chart below, in the past 12 months, we have disclosed and sold your personal information to third parties for business or commercial purposes.

Categories of Personal Information Collected in the last 12 months:	Categories of sources from which information is collected:	Business or commercial purposes for collection, use, and sharing:	Disclosed for business purposes to the following categories of third parties:
Personal and online identifiers (such as first and last name, email address, or unique online identifiers)	All categories listed below in Section 3.	All purposes listed below in Section 4.	All categories listed below in Section 5.
Certain customer record information (such as address, telephone number, employment history, education)	All categories listed below in Section 3.	All purposes listed below in Section 4.	All categories listed below in Section 5.
Characteristics of protected classifications under California or federal law (such as race, gender or veteran status)	All categories listed below in Section 3.	All purposes listed below in Section 4.	All categories listed below in Section 5.
Internet or other electronic network activity information (such as browsing history, search history, interactions with a website or email)	All categories listed below in Section 3.	All purposes listed below in Section 4.	All categories listed below in Section 5.
Biometric information (such as call recordings)	All categories listed below.	All purposes listed below.	All categories listed below.
Professional or employment-related information	All categories listed below in Section 3.	All purposes listed below in Section 4.	All categories listed below in Section 5.
Education information	All categories listed below in Section 3.	All purposes listed below in Section 4.	All categories listed below in Section 5.

Other information about you that is linked to the personal information above (such as information you associate with your employment application)	All categories listed below.	All purposes listed below.	All categories listed below.
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3. Categories of Sources of Personal Information We Collect

We collect personal information from the following categories of sources:

- a. Users of the Site (when accessing or using the Site);
- b. Users' devices (when accessing or using the Site); and
- c. Service providers.

4. Why We Collect, Use, and Share Information for Business and Commercial Purposes

We use and disclose the personal information we collect for our commercial and business purposes, as further described in this Privacy Notice. These commercial and business purposes include, without limitation:

- a. Preventing, detecting and protecting against fraud and prohibited or illegal activities;
- b. Performing services (for us or our service providers) such as account servicing, providing customer service, fulfilling transactions, verifying consumer information, providing analytic services;
- c. Internal research for technological improvement;
- d. Internal operations;
- e. To enforce our terms and conditions;
- f. Debugging;
- g. To verify your identity and establish you as a registered user of the *Authenticate* mobile app, to provide the service to you, and to resolve issues relating to your registration and use of the service;
- h. To consider and act upon your application when you apply for a career position with us;
- i. Verifying changes you have made to your personal information;
- j. Auditing related to our interactions with you;
- k. Activities to create, develop, operate, deliver, maintain and improve our products and services;
- l. Legal compliance;
- m. For business inquiries, we respond to your requests made through the Website for white papers regarding our products and services, send you information about our products and services that we believe you will find beneficial and to comply with your stated communication preferences;

- n. Providing you with a safe, efficient, and customized experience;
- o. Authentication;
- p. Providing other services you request; and
- q. Other one-time uses.

5. Recipients of Personal Information

We may disclose the categories of personal information designated above to the categories of third parties listed below for business purposes:

- a. The Early Warning Services, LLC corporate family;
- b. Our service providers;
- c. Law enforcement, government agencies and other authorized third parties;
- d. New owners (in the event we plan to merge with or be acquired by that business entity): and
- e. Other entities with your consent.

6. Your Choices

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

If you do not wish to receive marketing communications regarding our products (for business inquiries), 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.

If you use our *Authenticate* mobile app, we may contact you with important information related to your profile, including but not limited to, activation and deactivation notices and transactional information. You may not opt-out of administrative emails for your profile.

7. Minors' Right to Opt In

We do not knowingly collect information from children as set forth above, however if we ever do, we will provide an opt-in before selling any such data of children.

8. Accessing, Reviewing, and Updating Your Personal Information

If you use the *Authenticate* mobile app, you can access, review, and update your personal information by accessing your profile within the app. For questions about this functionality, or if

you are unable to view or update your information, please contact authenticate_feedback@earlywarning.com

If you have applied for a position with Early Warning, you can update your candidate profile by logging in [here](#).

9. 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.

If you are using the *Authenticate* mobile app, information from closed or suspended profiles will only be retained as necessary to comply with law, prevent fraud, assist with investigations, resolve disputes, analyze or troubleshoot programs, enforce our terms and conditions, or take other actions permitted by law.

10. How We Use Cookies and Tracking Technologies

When you visit the Site, you consent to the use of cookies and tracking technologies as well as the corresponding processing of your personal information. We and our third parties may use cookies and other tracking technologies for a variety of purposes, as outlined in this Privacy Notice and as described below. You can withdraw your consent at any time by deleting placed cookies and disabling cookies in your browser.

- a. **Operationally Necessary.** We may use tracking technologies required for system administration, to prevent fraudulent activity and improve security. We are not required to obtain your consent for tracking technologies that are operationally necessary.
- b. **Performance-Related.** We may use cookies or other tracking technologies to assess the performance of the online services, including as part of our analytic practices to improve the content offered through the online services.
- c. **Functionality-Related.** We may use tracking technologies 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.

During some visits we may use software tools to measure and collect session information, including page response times, download errors, time spent on certain pages and page interaction information.

A few additional important things you should know about our use of tracking technologies (e.g., cookies, HTML-5 stored technologies):

- We offer certain features that are available only through the use of tracking technologies.
- We use both persistent and temporary tracking technologies. Tracking technologies (e.g., cookies) can either be persistent (i.e., they remain on your computer until you delete them) or temporary (i.e., they last only until you close your browser). You are always free to decline tracking technologies if your browser permits, although doing so may interfere with your use of the Site. Refer to the help section of your browser, browser extensions, or installed applications for instructions on blocking, deleting, or disabling tracking technologies such as cookies.
- We use cookies and tracking technologies with your prior consent as obtained through your use of this Site.
- You may encounter tracking technologies/cookies from our third-party service providers that we have allowed on our Site that assist us with various aspects of our Site operations and services, such as Google Analytics.

For more information about the use of cookies and similar technology on our Site, please review [Sections 2, 3, 4 and 5](#) of this Privacy Notice.

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 all third-parties to which our Site has disclosed certain personal information (as defined by California law) during the preceding year for those third-parties' direct marketing purposes. If you are a California resident and want such a list, please contact us at privacyoffice@earlywarning.com. For all requests, you must put the

statement "Your California Privacy Rights" in the body of your request, as well as your name, street address, city, state, and zip code. In the body of your request, please provide enough information for us to determine if this applies to you. You need to attest to the fact that you are a California resident and provide a current California address for our response. Please note that we will not accept requests via the telephone, mail, or by facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

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 Channel Partners. When you leave our Website 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.

13. Security

To help us protect the privacy of your data, 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. It is your responsibility to make sure that your personal information is accurate and that your password(s) and profile registration information for the *Authenticate* mobile app are secure and not shared with third-parties. 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.

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

15. Territorial Scope and Processing

We are located in the United States. 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. If you create an *Authenticate* mobile app profile, you consent to the collection and/or processing of your personal information and tracking technologies/cookies as described in this Privacy Notice.

16. Notification Regarding Updates to This Privacy Notice

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

17. 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.

If you are a Zelle® user, please see the *Zelle* Privacy Policy for information on your data privacy rights.

If you are a clearXchange® user, please see clearXchange's Privacy Notice for information on your data privacy rights.