Early Warning Services, LLC
Privacy Notice

Last updated: January 8, 2021

Welcome! Thank you for visiting the Early Warning website.

Early Warning Services, LLC, is a fintech company owned by seven of the country's largest banks. For almost three decades, our identity, risk and payment solutions have been empowering financial institutions to make confident decisions, enable payments and mitigate fraud. Today, Early Warning is best known as the owner and operator of the Zelle Network®, a financial services network focused on transforming payment experiences.

This 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 *Authentify*® mobile app offered to consumers (collectively, the "Site"). 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 on the earlywarning.com homepage and in the *Authentify* mobile app. You may also call 844.212.9102 (8am to 5pm ET) to request a copy by US mail.

By using this Site, 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 Site if you do not agree with our Privacy Notice.

What do you want to learn more about?

1. **When this Privacy Notice applies**

This Privacy Notices applies to our website, earlywarning.com (referred to as the "Website" from here on out) and our *Authentify*® mobile app offered to consumers (collectively, the "Site").

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

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 or used our Site 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., first and last 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
Certain personal information (e.g., address, telephone number, employment history, education)	All categories listed below in Section 4.	All purposes listed below in Section 5.	All categories listed below in Section 6.	None
Characteristics of protected classifications under state or	All categories listed below in Section 4.	All purposes listed below in Section 5.	All categories listed below in Section 6.	None

federal law (e.g., race, gender, veteran status)				
Internet or other electronic network activity information (e.g., browsing history, search history, interactions with our Site)	All categories listed below in Section 4.	All purposes listed below in Section 5.	All categories listed below in Section 6.	None
Biometric information (e.g., call recordings if you call Customer Support for assistance with the *Authentify* mobile app)	All categories listed Below in Section 4.	All purposes listed below in Section 5.	All categories listed Below in Section 6.	None
Professional or employment-related information (i.e., if you apply for employment with us)	All categories listed below in Section 4.	All purposes listed below in Section 5.	All categories listed below in Section 6.	None
Education information (i.e., if you apply for employment with us)	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 employment application)	All categories listed below in Section 4.	All purposes listed below in Section 5.	All categories listed Below in Section 6.	None

4. Categories of sources of personal information we collect

When you visit or use our Site, we collect personal information from:

a. you directly when you provide it (e.g., when you apply for a position with us, you provide your information to us);
b. your device (e.g., your mobile device shares your Unique Device ID and name of your device when you use the *Authentify* mobile app); and
c. service providers (e.g., we use service providers to help us provide our services).

5. Why we collect, use, and share information for business purposes
When you visit or use our Site, we collect, use, and share personal information for the following business purposes:

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. enforcing our terms and conditions;
f. debugging to identify and repair errors that impair existing intended functionality;
g. verifying your identity and establishing you as a registered user of the *Authentify* mobile app, providing the service to you, and resolving issues relating to your registration and use of the service;
h. considering and acting upon your application when you apply for a career position with us;
i. verifying changes you have made to your personal information;
j. creating, developing, operating, delivering, maintaining, and improving our products and services;
l. for legal compliance;
m. for business partner inquiries (B2B), to respond to your requests made through the Website for white papers regarding our products and services, to 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. for authentication;
p. providing other services you request; and
q. other one-time uses.

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

a. the Early Warning Services, LLC corporate family;
b. our service providers (e.g., companies that help us operate our Website and provide customer service);
c. law enforcement, government agencies and other authorized third parties (we may be required by law to share information for legal reasons);

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.

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. Your choices

Business Partners/Inquiries (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 regarding our products and services, 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.

Authentify *Mobile App Users*

If you use our *Authentify* 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.

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. Accessing, reviewing, and updating your personal information

Authentify *Mobile App Users*

If you use the *Authentify* 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 authentify_feedback@earlywarning.com.

Candidates for Employment

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

10. 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 *Authentify* 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.

11. 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.

When you visit the Website, 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.

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 for system administration, to prevent fraudulent activity, and improve security.
b. **Analytics and Performance-Related Cookies.** We may use these cookies or other tracking technologies to assess the performance of our Website, including as part of our analytic practices to improve the content offered on the Website.
c. **Functionality-Related Cookies.** 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 Website. 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 Website.
- You may encounter tracking technologies/cookies from our third-party service providers that we have allowed on our Website that assist us with various aspects of our Website operations and services, such as Google Analytics.

For more information about the use of cookies and similar technology on our Site, please review Sections 3, 4, 5 and 6 of this Privacy Notice.

12. 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.

13. 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.

14. 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.

It is your responsibility to make sure that your personal information is accurate and that your password(s) and profile registration information for the *Authentify* 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.

15. Where personal information is stored
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 *Authentify* 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. Changes 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. 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.

If you are a Zelle® user, please see the *Zelle* App Privacy Notice 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.