

# Early Warning Services' Privacy Notice for Product Research Participants

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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 applies to surveys, user experience testing, and interviews conducted by Early Warning when conducting product research (referred to as “Early Warning Research” 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 [earlywarning.com](http://earlywarning.com) homepage. You may also email [uxresearch@earlywarning.com](mailto:uxresearch@earlywarning.com) to request a copy by US mail.

***By participating in Early Warning Research, 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 participate in Early Warning Research if you do not agree with our Privacy Notice.***

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

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## Early Warning Services’ Privacy Notice for Product Research Participants

### 1. When this Privacy Notice applies

This Privacy Notice applies to surveys, user experience testing, and interviews conducted by Early Warning when conducting product research (referred to as “Early Warning Research” from here on out).

As a visitor to our website, earlywarning.com, our Website Privacy Notice also applies. [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, and telephone number.

### 3. Personal information we’ve collected and shared

If you’ve participated in Early Warning Research in the past 12 months, we may have collected and shared the following categories of personal information about you for a business purpose(s):

| <b>Categories of personal information we’ve collected in the last 12 months for Early Warning Research:</b> | <b>Categories of sources from which information is collected:</b> | <b>Business purpose(s) for collection, use, and sharing:</b> | <b>Shared for business purpose(s) to the following categories of third parties:</b> | <b>Sold to the following categories of third parties:</b> |
|---|---|--|---|---|
| Personal and online identifiers (e.g., name, email address)   | All categories listed below in Section 4.                         | All purposes listed below in Section 5.                      | All categories listed below in Section 6.   | None  |

| <b>Categories of personal information we've collected in the last 12 months for Early Warning Research:</b>   | <b>Categories of sources from which information is collected:</b> | <b>Business purpose(s) for collection, use, and sharing:</b> | <b>Shared for business purpose(s) to the following categories of third parties:</b> | <b>Sold to the following categories of third parties:</b> |
|---|---|--|---|---|
| Certain personal information (e.g., telephone numbers)  | All categories listed below in Section 4.                         | All purposes listed below in Section 5.                      | All categories listed below in Section 6.   | No  |
| Biometric information (i.e., voice and/or video recordings of our interviews, with your consent)  | All categories listed below in Section 4.                         | All purposes listed below in Section 5.                      | All categories listed below in Section 6.   | No  |
| Other information about you that is linked to the personal information above (e.g., information you share with us when participating in Early Warning Research) | All categories listed below in Section 4.                         | All purposes listed below in Section 5.                      | All categories listed below in Section 6.   | No  |

**4. How we collect personal information**

When you participate in Early Warning Research, we collect personal information from you directly when you provide it (e.g., when you participate in an interview, you may share personal information with us).

**5. How we use personal information**

When you participate in Early Warning Research, we collect, use, and share personal information for the following business reasons:

1. for internal research for technological improvement;
2. to create, develop, test, operate, deliver, maintain, and improve our products and services and related marketing strategies;
3. to comply with legal and compliance obligations, including tax obligations;
4. to compensate you for participating in Early Warning Research (when eligible); and
5. to communicate with you about your participation in Early Warning Research and comply with your stated communication preferences.

**6. Who we share personal information with**

When you participate in Early Warning Research, we may share personal information with the following categories of third parties for the business purposes we described above in Section 5.

1. the Early Warning Services, LLC corporate family (e.g., Early Warning is the parent company of Zelle®);
2. our bank and credit union partners and potential partners (e.g., We may share excerpts from our interviews and/or aggregate information about our research results with our bank and credit union partners and potential partners);
3. our service providers (e.g., We may use an online survey tool when conducting Early Warning Research);
4. law enforcement, government agencies, and other authorized third parties (we may be required by law to share information for legal reasons);
5. new owners (in the event we plan to merge with or be acquired by that business entity); and
6. other entities with your consent.

## 7. Minors' privacy

Our Early Warning Research is not intended for children under the age of 18. We do not knowingly collect personal information from children. We do not sell personal information collected for Early Warning Research. 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](http://www.ftc.gov).**

## 8. Your choices

If you later decide that you no longer want to participate in Early Warning Research, you may notify us by email at [uxresearch@earlywarning.com](mailto:uxresearch@earlywarning.com) and we will remove you from our Early Warning Research.

## 9. Your rights regarding your personal information

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 Early Warning Research 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 for Early Warning Research.
- 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 you in the preceding 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 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.

## **10. How to exercise your data privacy rights**

Please submit your request by emailing us at [uxresearch@earlywarning.com](mailto:uxresearch@earlywarning.com) with the subject line: Data Privacy Rights 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).

## **11. How we verify your request**

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.

## **12. 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 emailing us at [uxresearch@earlywarning.com](mailto:uxresearch@earlywarning.com) with the subject line: Data Privacy Rights Request.

### **13. 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.

### **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.

### **15. 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.

### **16. 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 this webpage. You should check this Privacy Notice 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](mailto:privacyoffice@earlywarning.com), or write to us at Early Warning Services, LLC., Attn: Privacy Office, 16552 N. 90th St, Scottsdale, AZ 85260.