

Early Warning Services, LLC Privacy Notice

Last updated: January 11, 2022

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"). 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. You may also call 844.212.9102 (8am to 5pm ET) to request a copy by US 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 our Privacy Notice.

What do you want to learn more about?

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1. When this Privacy Notice applies

This Privacy Notices applies to our website, earlywarning.com.

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, used, and shared

If you've visited our Website in the past 12 months, we may have collected, used, 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:

- Certain personal information (e.g., address, telephone number, employment history, education)
- Characteristics of protected classifications under state or federal law (e.g., race, gender, veteran status)
- Internet or other electronic network activity information (e.g., browsing history, search history, interactions with our Website)

- Professional or employment-related information (if you apply for employment with us)
- Education information (if you apply for employment with us)
- Health and medical information (e.g., temperature screenings, health assessments, proof of vaccinations)
- Other information about you that is linked to the personal information above (e.g., information you associate with your employment application)

Categories of sources from which information is collected

All categories listed below in Section 4.

Business purpose(s) for collection, use, and sharing

All purposes listed below in Section 5.

Shared for business purpose(s) to the following categories of third parties

All categories listed below in Section 6.

Sold to the following categories of third parties

None

4. How we collect personal information

When you visit our Website, we collect:

- a. personal information that you provide to us (e.g., when you apply for a position with us, you provide your information to us);
- b. website usage information automatically from the device you are using to access our Website; (e.g., and

5. How we use personal information

When you visit our Website, we collect, use, and share personal information for the following business purposes:

- a. to prevent, detect, and protect against security incidents, fraud and prohibited or illegal activities;

- b. to perform services (for us or our service providers) such as providing analytic services;
- c. for internal research for technological improvement;
- d. for internal operations;
- e. to enforce our terms and conditions;
- f. to debug to identify and repair errors that impair existing intended functionality;
- g. to consider and act upon your application if you apply for a career position with us;
- h. to create, develop, operate, deliver, maintain, and improve Website;
- i. for legal compliance;
- j. 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;
- k. to provide you with a safe, efficient, and customized experience;
- l. or authentication; to provide other services you request; and
- m. 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);
- c. law enforcement, government agencies and other authorized third parties (we may be required by law to share information);
- 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., by 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.

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

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.

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 to prevent fraudulent activity, improve security, and/or for system administration. We are not required to obtain your consent for cookies that are strictly necessary.
- b. **Analytics and Performance-Related Cookies.** 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.
- 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 information collected by cookies and similar technology on our Website, 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.

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.

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 Website. You should check the Website 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.