

# EARLYWARNING.COM WEBSITE PRIVACY NOTICE

## Early Warning Services, LLC Privacy Notice

Last updated: December 28, 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 more than 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 844.428.8542 (Sunday through Saturday, 10am to 10pm ET, excluding New Year's Day, Independence Day, Thanksgiving, and Christmas) 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 this 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 (referred to as the "Website").

If you are a California resident and you applied for employment with us, please click here to read the [Applicant Privacy Notice for California Residents](#).

## 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.

Personal information does not include information obtained from public sources or information that is made available 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 visited our Website 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):

Categories of personal information we've collected in the last 12 months:	Categories of sources from which personal information is collected:	Business purpose(s) for collection, use, and disclosure:	Disclosed for business purpose(s) to the following categories of third parties:	Sold or shared to the following categories of third parties:	Length of time personal information is intended to be retained: (unless subject to a legal hold)
Personal and online identifiers (e.g., name, email address, IP address, unique online identifiers)	<ul style="list-style-type: none"><li>All categories listed below in Section 4.</li></ul>	<ul style="list-style-type: none"><li>All purposes listed below in Section 5.</li></ul>	<ul style="list-style-type: none"><li>All categories listed below in Section 6.</li></ul>	<ul style="list-style-type: none"><li>None</li></ul>	<ul style="list-style-type: none"><li>Up to 26 months</li></ul>
Certain identifying personal information (e.g., address, telephone number)	<ul style="list-style-type: none"><li>Directly from you when you use a form on the Website to request information about our products and services or when you request to become a service provider.</li></ul>	<ul style="list-style-type: none"><li>All purposes listed below in Section 5.</li></ul>	<ul style="list-style-type: none"><li>All categories listed below in Section 6.</li></ul>	<ul style="list-style-type: none"><li>None</li></ul>	<ul style="list-style-type: none"><li>up to 26 months</li></ul>
Internet or other electronic network activity information (e.g., browsing history, search history, interactions with our Website)	<ul style="list-style-type: none"><li>From your device when you use the Website.</li></ul>	<ul style="list-style-type: none"><li>All purposes listed below in Section 5.</li></ul>	<ul style="list-style-type: none"><li>All categories listed below in Section 6.</li></ul>	<ul style="list-style-type: none"><li>None</li></ul>	<ul style="list-style-type: none"><li>up to 26 months</li></ul>
Other information about you that is linked to the personal information above (e.g., when you apply to be a Company supplier, you may provide additional information about your company and services)	<ul style="list-style-type: none"><li>Directly from you when you use a form on the Website to request information about our products and services or when you request to become a service provider.</li></ul>	<ul style="list-style-type: none"><li>All purposes listed below in Section 5.</li></ul>	<ul style="list-style-type: none"><li>All categories listed below in Section 6.</li></ul>	<ul style="list-style-type: none"><li>None</li></ul>	<ul style="list-style-type: none"><li>up to 26 months</li></ul>

## 4. How we collect personal information

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

- Passively from your device:* We collect website usage information automatically from the device you are using to access our Website; and
- Directly from you:* We collect personal information that you give us if you submit a form on our Website.

## 5. How we use personal information

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

- to prevent, detect, and protect against security incidents, fraud, and prohibited or illegal activities;
- to undertake activities to verify or maintain the quality or safety of our services;
- to perform services (for us or our service providers) such as providing analytic services;
- for internal research for technological development, demonstration, and improvement;
- for internal operations;
- to enforce our terms and conditions;
- to debug, identify, and repair errors that impair existing intended functionality;

- h. to create, develop, operate, deliver, maintain, and improve Website;
- i. for legal compliance;
- j. to respond to your requests and comply with your stated communication preferences;
- k. 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;
- l. for service provider inquiries (B2B), to respond to your requests to become an Early Warning service provider;
- m. to provide you with a safe, efficient, and customized experience; and
- n. to provide other services you request.

## 6. Who we disclose personal information to

We may disclose personal information to 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 disclose information for legal reasons);
- d. existing owners and their employees and agents;
- e. new owners (in the event we plan to merge with or be acquired by that business entity); and
- f. other entities with your consent.

In the past 12 months, we have not sold or shared personal information from the Website. For purposes of this Privacy Notice, “sale” means the disclosure of personal information to a third-party for monetary or other valuable consideration and “share” means the disclosure of personal information to a third party for cross-context behavioral advertising.

## 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](mailto:marketing@earlywarning.com). Please allow us a reasonable period of time in order to satisfy your request, as some communications may already be in progress.

If you’ve previously expressed interest in becoming an Early Warning service provider and you no longer wish to be one, please notify our Procurement team.

## 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 or share information that is collected from our Website so therefore we have not sold or share 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).**

## 9. B2B California residents’ privacy rights

If you are a California resident and you’ve interacted with us on behalf of your company/business (i.e., you’ve expressed interest in our products/services for your financial institution or you’ve applied to be a service provider), the following data privacy rights are available to you:

*Note: If you are a California resident and you applied for employment with us, please click here to read the [Applicant Privacy Notice for California Residents](#).*

	You have the right to...	How?
<b>Third party direct marketing</b>	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.
<b>Be informed</b>	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.	Review this Privacy Notice in its entirety to learn more about the personal information we collect, why we collect personal information, the sources from which we collect personal information from, and who we may disclose personal information to.  <b>CA Business Partners and Service Providers (B2B)</b>  Send an email to <a href="mailto:privacyoffice@earlywarning.com">privacyoffice@earlywarning.com</a>

	parties with which we've sold or shared personal information.	<p>Send an email to <a href="mailto:privacyoffice@earlywarning.com">privacyoffice@earlywarning.com</a> with "California Data Privacy Rights Request" in the subject line. In the body of the email, please include:</p> <ul style="list-style-type: none"> <li>• Your first name</li> <li>• Your last name</li> <li>• The name of your business/company</li> <li>• Your business email address or business telephone number</li> <li>• Your relationship with us (business partner or service provider)</li> <li>• Your request (access, correct, or delete personal information)</li> </ul> <p><i>Note: In the past 12 months, we have not sold or shared personal information from the Website. For purposes of this Privacy Notice, "sale" means the disclosure of personal information to a third-party for monetary or other valuable consideration and "share" means the disclosure of personal information to a third party for cross-context behavioral advertising.</i></p>
<b>Correct inaccurate data</b>	Request that we correct inaccurate personal information that we maintain about you.	<p><b>CA Business Partners and Service Providers (B2B)</b></p> <p>Send an email to <a href="mailto:privacyoffice@earlywarning.com">privacyoffice@earlywarning.com</a> with "California Data Privacy Rights Request" in the subject line. In the body of the email, please include:</p> <ul style="list-style-type: none"> <li>• Your first name</li> <li>• Your last name</li> <li>• The name of your business/company</li> <li>• Your business email address or business telephone number</li> <li>• Your relationship with us (business partner or service provider)</li> <li>• Your request (access, correct, or delete personal information)</li> </ul> <p><i>Note: To the extent required by, and in accordance with applicable law, we will use commercially reasonable efforts to correct your personal information as directed by you, considering the nature and the purposes of maintaining your personal information. Under certain circumstances, we may not be able to correct your information because we have a legal obligation or other reason in which we must retain it in its current state (e.g., the nature of the data, the source of the data, to comply with law).</i></p>
<b>Delete data</b>	Request that we delete your personal information.	<p><b>CA Business Partners and Service Providers (B2B)</b></p> <p>Send an email to <a href="mailto:privacyoffice@earlywarning.com">privacyoffice@earlywarning.com</a> with "California Data Privacy Rights Request" in the subject line. In the body of the email, please include:</p> <ul style="list-style-type: none"> <li>• Your first name</li> <li>• Your last name</li> <li>• The name of your business/company</li> <li>• Your business email address or business telephone number</li> <li>• Your relationship with us (business partner or service provider)</li> <li>• Your request (access, correct, or delete personal information)</li> </ul> <p><i>Note: 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.</i></p>
<b>Limit data</b>	Limit the use of sensitive personal information.	Our Website does not collect sensitive personal information.
<b>Opt out</b>	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 Website

		with third parties.
<b>Free from discrimination</b>	Be free from discrimination for exercising your privacy rights	We will not discriminate against you for exercising your choices and rights.
<b>Access</b>	Access your personal information that we've collected about you in the preceding 12 months following your request.	<p><b>CA Business Partners and Service Providers (B2B)</b></p> <p>Send an email to <a href="mailto:privacyoffice@earlywarning.com">privacyoffice@earlywarning.com</a> with "California Data Privacy Rights Request" in the subject line. In the body of the email, please include:</p> <ul style="list-style-type: none"> <li>• Your first name</li> <li>• Your last name</li> <li>• The name of your business/company</li> <li>• Your business email address or business telephone number</li> <li>• Your relationship with us (business partner or service provider)</li> <li>• Your request (access, correct, or delete personal information)</li> </ul> <p><i>Note: You may request that we disclose the above information beyond the 12-month period for personal information collected on or after January 1, 2022, unless doing so proves impossible or would involve a disproportionate effort.</i></p>

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, your account with us 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.

Upon receipt of your "California Data Privacy Rights Request" email, 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).

When you make a request, we will attempt to verify that you are who you say you are. For example, we will attempt to match information that you provide in making your request with information that we have on file. 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.

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 sending an email to [privacyoffice@earlywarning.com](mailto:privacyoffice@earlywarning.com).

## 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. See [Section 3](#) for more information.

## 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:

Cookie Type	Description
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.
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.
Functionality-Related Cookies	We may use these cookies 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.

**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. 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.

## 14. 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.

## 15. 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.

## 16. 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, 5801 N Pima Rd, Scottsdale, AZ 85250.

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.



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<sup>®</sup>, a financial services network focused on transforming payment experiences.

## PRODUCTS

### BRIGHT IDEAS

#### NEWS

Looking for Consumer Report Information? Early Warning supports consumers' rights to dispute and corrects inaccurate or incomplete information.

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## YOUR CONSUMER REPORT

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