

Early Warning Services' Privacy Notice for Product Research Participants

Updated: December 28, 2022



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 applies to surveys, user experience testing, and interviews conducted by Early Warning for product research (referred to as "Early Warning Research" from here on out). It describes the personal information we collect, how it's used and disclosed, 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 on the earlywarning.com website. To request a hard copy of this Privacy Notice by US mail email uxresearch@earlywarning.com.

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 this Privacy Notice.

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

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Early Warning Research 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 for 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.

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 participated in Early Warning Research 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 for Early Warning Research:	Categories of sources from which information is collected:	Business purpose(s) for collection, use, and disclosing:	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)	<ul style="list-style-type: none">• Directly from you when you participate in Early Warning Research.	<ul style="list-style-type: none">• All purposes listed below in Section 5.	<ul style="list-style-type: none">• All categories listed below in Section 6.	<ul style="list-style-type: none">• None	<ul style="list-style-type: none">• Up to 2 years, post research completion.
Certain identifying personal information (e.g., address, telephone numbers)	<ul style="list-style-type: none">• Directly from you when you participate in Early Warning Research.	<ul style="list-style-type: none">• All purposes listed below in Section 5.	<ul style="list-style-type: none">• All categories listed below in Section 6.	<ul style="list-style-type: none">• None	<ul style="list-style-type: none">• Up to 2 years, post research completion.
Audio, electronic, visual, thermal, olfactory, or similar information (i.e., voice and/or video recordings of our interviews, with your consent)	<ul style="list-style-type: none">• When you participate in Early Warning Research, we may use voice and/or video recordings to capture your interview.	<ul style="list-style-type: none">• All purposes listed below in Section 5.	<ul style="list-style-type: none">• All categories listed below in Section 6.	<ul style="list-style-type: none">• None	<ul style="list-style-type: none">• Up to 4 years, post research completion.
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)	<ul style="list-style-type: none">• Directly from you when you participate in Early Warning Research.	<ul style="list-style-type: none">• All purposes listed below in Section 5.	<ul style="list-style-type: none">• All categories listed below in Section 6.	<ul style="list-style-type: none">• None	<ul style="list-style-type: none">• Up to 2 years, post research completion.

4. How we collect personal information

When you choose to participate in Early Warning Research, we collect personal information directly from you (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 disclose personal information for the following business purposea:

1. for internal research for technological development, demonstration, and improvement;
2. for internal operations;
3. to undertake activities to verify or maintain the quality or safety of our services;
4. to create, develop, test, operate, deliver, maintain, and improve our products and services and related marketing strategies;
5. to comply with legal and compliance obligations, including tax obligations;

6. to compensate you for participating in Early Warning Research (when eligible);
7. for legal compliance
8. to communicate with you about your participation in Early Warning Research and comply with your stated communication preferences; and
9. other one-time uses.

6. Who we disclose personal information to

When you participate in Early Warning Research, we may disclose personal information to 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 network operator of Zelle®);
2. our bank and credit union partners and potential partners (e.g., We may share excerpts from our interviews and/or aggregate or deidentified 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. existing owners and their employees and agents
6. new owners (in the event we plan to merge with or be acquired by that business entity); and
7. 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 or share personal information collected for Early Warning Research. Therefore, we would not sell or share information about minors.

For information about the Children's Online Privacy Protection Act (COPPA), visit the FTC website: 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 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...	How?
Third party direct marketing	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.
Be informed	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.	<p>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.</p> <p>Please submit your request by emailing us at uxresearch@earlywarning.com with the subject line: Data Privacy Rights Request.</p> <p>Note: In the past 12 months, we have not sold or shared personal information from Early Warning Research. 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.</p>
Correct inaccurate data	Request that we correct inaccurate personal information that we maintain about you.	<p>Please submit your request by emailing us at uxresearch@earlywarning.com with the subject line: Data Privacy Rights Request.</p> <p>Note: To the extent required by, and in accordance with applicable law, We will use commercially</p>

		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).
Delete data	Request that we delete your personal information.	<p>Please submit your request by emailing us at uxresearch@earlywarning.com with the subject line: Data Privacy Rights Request.</p> <p>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.</p>
Limit data	Limit the use of sensitive personal information.	We do not collect sensitive personal information.
Opt out	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 Early Warning Research with third parties.
Free from discrimination	Be free from discrimination for exercising your privacy rights	We will not discriminate against you for exercising your choices and rights.
Access	Access your personal information that we've collected about you in the preceding 12 months following your request.	<p>Please submit your request by emailing us at uxresearch@earlywarning.com with the subject line: Data Privacy Rights Request.</p> <p>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.</p>
Appeal	Appeal if we decline to act on any of the above requests you've made	Please submit your appeal by emailing us at uxresearch@earlywarning.com with the subject line: Data Privacy Rights 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.

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).

10. 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.

11. 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 with the subject line: Data Privacy Rights Request.

12. 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.

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 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.

15. 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.

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



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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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