

CLEARXCHANGE, LLC PRIVACY POLICY

Last Updated: September 12, 2017

clearXchange[®] takes the privacy and security of personal information very seriously. Please read our Privacy Policy to understand how we will collect, use, disclose and protect information about you.

SCOPE OF PRIVACY POLICY

clearXchange LLC provides U.S. financial institutions that are clearXchange customers (our “Network Banks”) a network directory service to enable convenient transfers of money between their respective account holders using email addresses or mobile phone numbers. clearXchange also provides an out-of-network service for individuals who do not have a deposit account with our Network Banks to enable such clearXchange.com Users (each “User”) to receive money from a Network Bank Customer using the User’s email address or mobile phone number (the “Service”).

This Privacy Policy applies to the (i) clearXchange, LLC website, <https://www.clearxchange.com> (the “Website”) and (ii) the use of Service. By using the Website or Service, you consent to the privacy practices described in this Privacy Policy.

This Privacy Policy does not apply to information about you collected (i) by third party services, applications or websites, or advertisements associated with, linked to or otherwise accessible from the Website or (ii) by third party individuals, retailers, financial institutions or other firms or companies with which you conduct transactions or communications facilitated and/or confirmed through use of the Service (“Third Party Transactions”). The information collected and received by such third parties is subject to their privacy policies and under no circumstance is clearXchange liable for the third party’s compliance therewith. You should review the privacy policies of third parties with whom you conduct or engage in Third Party Transactions.

COLLECTION, USE AND DISCLOSURE OF INFORMATION

We may collect information from or about you in a number of ways, including (i) when you give it to us, when you give us permission to obtain it, (ii) when we obtain it from other sources, and (iii) automatically when you use our Website or Service.

To understand what information we may collect from or about you, and how we use and disclose it, please select the appropriate activity below:

- [Visiting our Website](#)
- [How we use cookie technology](#)
- [Using our Service](#)
- [How we use and disclose personal information collected when you visit our Website or use our Service](#)
- [How we share personal information](#)
- For additional information about our privacy practices, please [click here](#)

Visiting Our Website

We and our third-party Service Providers may automatically collect information from visitors to our Website, including individuals who do not register as Users, including:

- Your Internet Protocol (IP) address
- The web page from which you entered our Website

- The type of web browser or operating system you are using
- The name of your internet service provider
- Your activity while using the Website (including access times, new and repeat visit information, which of our web pages you visit, how long you spend on each page, and exit page information).

See the How We Use Cookie Technology section for information on internet data we collect.

How We Use Cookie Technology

To collect internet data we use cookie technology. A “cookie” is a text file that is placed on your hard disk by a web page server. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. Cookies cannot be used to run programs or deliver viruses to your computer. We may also use pixel tags, web beacons, clear GIFs, JavaScript or other technologies.

These are online technologies that function similarly to cookies and help us track activities on our Website and to count users who open our HTML-formatted email messages.

Most popular Internet browser applications will allow you to configure the browser so as not to accept cookies. However, setting your browser to reject cookies may, in certain instances, prevent you from taking full advantage of the Website (or some portion thereof) and its capabilities, or cause some features of the Website to function improperly or more slowly.

Using Our Service

We collect personally identifiable information (“Personal Information”) from you when you register as a User or when you update your information through our Website. This information may include:

- Name
- Date of birth
- Postal or email addresses
- Telephone number
- Mobile numbers
- Financial account numbers

We may also collect Personal Information from our Network Banks if they receive a notification that your bank account information in our database is inaccurate and needs to be changed. In addition, we may collect Personal Information from consumer reporting agencies in order to process your registration, verify your identity, verify your bank account information and protect against or prevent actual or potential fraud or unauthorized use. We may also collect certain technical data automatically when you use our Service. This information may include:

- Your Internet Protocol (IP) address
- The web page from which you entered our Website
- The type of web browser or operating system you are using
- The name of your internet service provider
- Your activity while using the Website (including access times, new and repeat visit information, which of our web pages you visit, how long you spend on each page, and exit page information)

See the How We Use Cookie Technology section for information on internet data we collect.

How We Use and Disclose Personal Information Collected When You Visit Our Website or Use Our Service

clearXchange does not sell information concerning visitors to the Website and we do not sell or rent your Personal Information to third parties for marketing purposes. Except as set forth in this Privacy Policy, we will not reveal any of your Personal Information to any other third party without your consent, except that we may share your Personal Information with our Service Providers (any person or company with whom we have entered into a legal arrangement for joint provision of or shared responsibility for provision of the Website or Service we provide) or business associates who assist us in administering our Service or the Website. Accordingly, we may use and disclose Personal Information collected when you visit our Website or use our Service for certain purposes, including:

- To enable our Network Banks to complete money transfers between their customers and you
- To send you an email or text message to notify you of a pending money transfer
- To verify changes you have made to your Personal Information
- To facilitate your registration on our Website and to resolve issues relating to your clearXchange registration
- To resolve a problem related to a transaction with our Network Banks
- To verify the existence of your bank account
- To verify your identity
- To test, correct and improve our content and services
- To analyze how the Website is being accessed and used
- To improve the Website's performance and delivery
- To customize your user experience
- To develop new products and services
- To comply with applicable laws and legal requirements (e.g. subpoena, court order, etc.)
- If it is necessary to allow our Service Providers or agents to provide services for us (such Service Providers or agents being required to maintain the confidentiality of your information with equal or greater protections than those provided by us)
- If it is necessary in connection with other business purposes including, without limitation, customer care, service quality, business management and operation, risk assessment, security, fraud and crime prevention/detection, monitoring, research and analysis, marketing and dispute resolution
- If it is necessary as part of a merger, divestiture or acquisition
- If it is necessary for us to provide it to our attorneys, accountants, regulators, auditors or other advisors
- As relevant if you register an account at a financial institution and that financial institution later becomes a Network Bank, you authorize us to share relevant information about you and your account with that financial institution

We may use and disclose automatically collected internet data primarily for purposes of administering, testing, protecting and improving our Website, analyzing how the Website is being accessed and used, to better understand the preferences of our Website visitors, identifying server problems, measuring effectiveness of our communications and success of our marketing campaigns, and personalizing your experience on our Website.

We may also create or compile aggregated and de-identified data, which is data that is derived from various sources, including accounts and transactions. This information, which does not identify individuals, is used by clearXchange for its business purposes, which may include offering services, research, marketing or analyzing market trends, and other purposes consistent with applicable laws.

We will retain your Personal Information for as long as needed to support the above-listed uses for our Website and Service and as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

How We Share Personal Information

We may share Personal Information of Users with Network Banks, affiliates, and other third parties (such as vendors or Service Providers) for the purposes described above under “How We Use and Disclose Personal Information Collected When You Visit Our Website or Use Our Service.”

We require any Service Provider with whom we share Personal Information to protect the confidentiality of such information and use it solely for the purposes for which it was shared. clearXchange will neither disclose nor share any of your Personal Information with our Network Banks, affiliates or any third party for purposes of marketing their or clearXchange’s products or services to you.

ADDITIONAL INFORMATION

Not for Children

Our Website and Service are not intended for children and we do not knowingly collect information from children under the age of 18. If you have reason to believe that we collected or are in possession of Personal Information from someone under 18 years of age, please let us know.

If you are under 18, please do not attempt to register for the Website or Service, or send any information about yourself to us. By using the Website or using the Service, you represent that you are not under 18 years of age.

Do Not Track

Our Website does not respond to “Do Not Track” signals. We do not collect personally identifiable information about your online activities over time and across third party websites or online services nor do we allow other parties to do so.

Our Security Safeguards

We take reasonable measures to safeguard your information, including technical, administrative and physical security controls to protect from unauthorized access, disclosure, or use. However, despite even our best efforts, the security of data transmission over the Internet cannot be completely guaranteed. You should always take precautions regarding how you handle and disclose your personal information and should avoid sending it through unsecure channels.

Linking to Third Party Websites

We may provide links to websites that are owned or operated by other third party companies and entities. When you use a link from the Website to visit a third party’s website, you will be subject to that website’s privacy policy, which may be different from ours. You should carefully read the policies of the websites you visit. We are not responsible for the privacy practices of any websites that are not owned or operated by us.

Reviewing and Updating Your Information

Keeping your clearXchange profile information, including your bank account, personal information, and email addresses/mobile numbers, accurate and up-to-date is very important. If your clearXchange profile information is incomplete, inaccurate or not current, please update your information by logging in to your clearXchange profile

California Privacy Rights

Residents of the State of California may request a list of all third-parties to which our Website has disclosed certain personal information (as defined by California law) during the preceding year for those third-parties' direct marketing purposes. If you are a California resident and want such a list, please contact us at privacyoffice@earlywarning.com. For all requests, you must put the statement "Your California Privacy Rights" in the body of your request, as well as your name, street address, city, state, and zip code. In the body of your request, please provide enough information for us to determine if this applies to you. You need to attest to the fact that you are a California resident and provide a current California address for our response. Please note that we will not accept requests via the telephone, mail, or by facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

International Users

Our Website and Service are intended for a U.S. audience. If you visit or use the Website or use the Service, your information may be transferred or processed within the United States, a jurisdiction in which the privacy laws may not be as comprehensive as those in the country where you reside and/or are a citizen. By accessing the Website or using our Service, you acknowledge and agree that we may collect, process, store, use, disclose, and dispose of your personal information in accordance with the terms of this Privacy Policy.

Privacy Policy Changes

clearXchange reserves the right to update this Policy from time to time. We will notify you of any material changes to the Policy by posting the new Policy here. If we make any changes to this Privacy Policy, we will change the "Last Updated" date above. You should periodically read this Privacy Policy to learn of any revisions.

How to Contact Us

If you have any questions regarding this Privacy Policy, refer to the latest customer service hours at <https://www.clearxchange.com/contact-us> and contact us at: 1-866-839-3488 or 1-501-748-8506.

You may also contact our Privacy Office should you have any questions about this Privacy Policy. For questions not related to privacy, click on the Contact Us link at the bottom of this page. We will keep a copy of your message until we have had an opportunity to address your concerns. We may archive your message for a certain period of time or discard it, but your email address will not be used for any other purpose.

clearXchange, LLC Attn: Privacy Office 16552 N. 90th Street Scottsdale, AZ 85260

1-480-483-4610

privacyoffice@earlywarning.com