# **Zelle:**

- Zelle uses two different privacy notices; Zelle app or the mobile banking app/online banking. Banking App/Online Banking tells consumers to Refer to their financial institution's privacy notice.
- Shares three pieces of data: information collected, how it's used and shared, and the choices that the consumer can make.
- Personal information can be:
  - o first and last name,
  - o email address,
  - o phone number,
  - o address,
  - o IP device & bank information.

## App:

- Relinquish consent to collection, use, disclosure, and retention of your personal information.
- For 12 months, the App is able to collect, use, and share your data. They:
  - o use your personal information,
  - o transaction information,
  - o internet/electronic network info.,
  - biometric info

#### Collect info from:

- The consumer
- Your device
- Zelle's bank/credit union partners
- Zelle's service providers

#### Use (reasons) for:

- General info such as prevention, detection, and protection against security, fraud, etc. Internet research, verify your financial account, etc.
- Perhaps some unclear uses (internal operations, & "for other one-time uses."

#### Shared with:

- Zelle users
- o Parent company of Zelle
- o Zelle's bank/union partners
- Service providers
- Law enforcement/gov't agencies, authorized 3rd parties

- New owners
- Most concern: companies in the mobile app industry

# Minors' Privacy

Is not intended for children under the age of 13.
 Your rights: While Zelle is exempt from certain privacy and data laws, they state they'll honor your data privacy rights.

### You have the right to:

- Request a list of the information shared with third parties for their
  Zelle's marketing (not the third parties marketing purposes).
- Categories and specific personal info Zelle collects, uses, shares, and sell about you, etc. (for the preceding 12 months).
- To delete data
- Opt out of the sale of your personal info.
- o To request your personal info. and to not be discriminated against.

# Ways Zelle protects data:

o Safeguards: firewalls, data encryption, etc

# <u>Venmo</u>

• Whether you use the app or the website, Venmo has one privacy policy.

## Collected:

- IP address, standard web log info (browser, website pages), phone number, address, name, DOB, and SSN
- \*May collect geolocation (time zone, language, device type, mobile device ID number, third parties for transaction processing, ID verification and fraud detection, Wi-fI, Longitude and latitude coordinates). Warning: If you do not accept these agreements, you cannot use service (or site wont function well in use they ask you to change their settings) as opposed to Zelle, which you can opt out of.

- Zelle also does not use geolocation.
- Social Web (SW) Info: email, Facebook credentials if you authorize, use of FB friends, profile pic, they import data from SW. Venmo will allow SW interactions and mentions from Venmo friends who "@" you.
- Financial Info bank/credit account and routing information

## • Protection:

- Personal information is stored and processed using third party servers but is protected by physical, electronic, and procedural safeguards in compliance with us Fed and State regulations.
- o Computer safeguards such as firewalls and data encryption
- Does not guarantee persona info may not be accessed, disclosed, altered or destroyed by breach...etc.

#### • Shared:

- Venmo & partners states that they may use cookies
- Option to use DNT (Do Not Track
- Minor's Policy
- Clearly states their services are not directed to children under 13. It will be deleted if detected.
- Only California residents have the rights to request access to personal information collected about them over the past 12 months, etc.

Zelle and Venmo have similar privacy policies. These money servicing and transferring companies work at your request. When you use their services, you are requesting assistance in transferring money to another account. With that in mind, both companies will require your personal information to transfer your funds, which results in access to your data.

With Access, Zelle and Venmo collect similar information. A few minor differences: Zelle has two policies and Zelle gives you the right to request access to data shared about you. Venmo on the other hand, only provides that information to California residents (at their request). A positive reflection on Zelle's privacy policy is that as a consumer, we have more rights to remove/request deletion. Venmo does not provide the same.