

March 23, 2018

Attorney General Gordon MacDonald Office of the Attorney General 33 Capitol Street Concord, NH 03301 RECEIVED
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CONSUMER PROTECTION

Re: Notice of Security Incident - Funding Circle USA, Inc.

Attorney General MacDonald,

Consistent with the requirements of N.H. Rev. Stat. §359-C:20I(b), we are writing to inform you that Funding Circle USA, Inc. ("Funding Circle") was notified by Dun & Bradstreet, Inc. ("D&B"), one of Funding Circle's data vendors, on March 3, 2018 of a security incident involving certain of D&B's email accounts. D&B's investigation revealed that unauthorized third parties used compromised credentials to log into the email accounts of a limited number of D&B employees. D&B discovered the security vulnerability in November 2017, and determined on February 20, 2018 that Funding Circle data may have been accessed.

Contained in the exposed email accounts was information about Funding Circle's United States-based customers and applicants, which Funding Circle had transmitted to D&B via secure file transfer protocol ("FTP"). This information included the names, addresses, phone numbers, and social security numbers of small business loan guarantors. Funding Circle has been in contact with D&B about this incident and has received assurances that D&B has subsequently taken steps to enhance its account security, including the installation of multi-factor authentication on internal email accounts, implementation of a stricter password policy, and integration of enhanced threat monitoring procedures. In addition, D&B retained a leading cybersecurity forensics firm to conduct a full investigation, and notified federal law enforcement of the incident.

A total of 14 New Hampshire consumers' personal information may have been accessed. While D&B is unable to determine if consumers' personal information was viewed or downloaded, Funding Circle has elected to proactively notify the 14 Nebraska consumers whose personal information may have been accessed. We are currently finalizing notifications to these consumers, and anticipate sending out the letters by March 29, 2018.

Please do not hesitate to let us know if you need further information or have any questions.

Sincerely,

Conor French General Counsel

Funding Circle USA, Inc.

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