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June 25, 2020

VIA OVERNIGHT MAIL

Attorney General Gordon MacDonald
Office of the New Hampshire Attorney General
Attn: Data Incident Notification
33 Capitol Street
Concord, NH 03301

RECEIVED

JUN 26 2020

CONSUMER PROTECTION

RE: Data Incident Notification

Dear Attorney General MacDonald,

Our firm represents DLL Finance LLC ("DLL"), a Delaware limited liability company. DLL recently experienced a data incident, and we are hereby formally notifying you of this event pursuant to N.H. Rev. Stat. Ann. § 359-C:20. By providing this notice, DLL does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire notification security breach statute, or all/any other applicable laws (including those pertaining to personal jurisdiction).

On May 8, 2020, DLL identified potential unauthorized access to an employee's email account and quickly shut off potential avenues of access to that account. DLL then promptly notified outside counsel and engaged third-party forensics experts to investigate the incident. Investigators found that the earliest unauthorized access to the account had occurred on April 30, 2020, when an employee of DLL fell victim to a phishing attack. While the DLL employee primarily processes business-to-business transactions, DLL's third-party forensic experts reviewed the contents of the employee's email account to determine if any personally identifiable information ("PII") was potentially affected. Eventually DLL's third-party investigators and counsel determined that individual social security numbers appeared on a small percentage of company credit applications, typically in hand-writing on scanned documents. On May 27, 2020, investigators and counsel confirmed which credit applications attached to emails contained personal information, primarily in the form of names, addresses, dates of birth and social security numbers.

While we have no evidence that any PII of any New Hampshire residents was actually accessed, we decided to notify the potentially affected individual out of an abundance of caution. DLL sent written notification to the potentially affected individual on June 24, 2020 via United States mail. The notice contains a description of what happened and the PII that could have

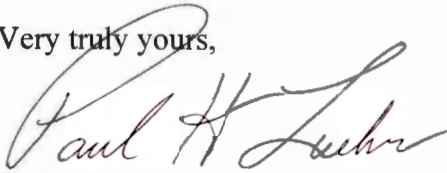
6.25.2020

potentially been accessed. For your reference, we have attached a sample letter of the individual notice, attached hereto as Exhibit A. DLL sent this notice to the one (1) New Hampshire resident identified by counsel and the third-party forensics team.

DLL is providing individuals with two years of free Experian credit monitoring service and a toll-free number to call with any questions. Additionally, DLL is reviewing its security procedures to identify areas where further actions can be taken to mitigate the risk of falling victim to incidents like this in the future.

If you have any questions regarding this matter, please do not hesitate to contact me at 612-766-7195 or paul.luehr@faegredrinker.com.

Very truly yours,

A handwritten signature in cursive script that reads "Paul H. Luehr". The signature is written in black ink and is positioned above the printed name and title.

Paul Luehr
Partner



EXHIBIT A

Sample Customer Notice

June 24, 2020

[[NAME]]
[[ADDRESS]]
[[CITY]], [[STATE]] [[ZIP]]

RE: Notice of Data Breach

Dear [[NAME]]:

I am writing on behalf of DLL Finance LLC (“DLL”) to inform you of an incident that may have involved your personal information. This letter provides you with information about the steps DLL has taken to further guard against the unauthorized disclosure and misuse of your personal information.

What Happened? On April 30, 2020, a DLL employee’s company e-mail account was subject to an attack by an unauthorized party. DLL identified potential unauthorized access to the company email account and quickly blocked the attacker on May 8, 2020 and began an inquiry into the nature and scope of the event. We also asked outside experts to conduct a more detailed review of the incident. On May 27, 2020, DLL confirmed the scope and details of personally identifiable information located in the email account.

What Information Was Involved? We do not have evidence that your personal information was actually accessed. However, we are reporting to you out of an abundance of caution. Based on our investigation, we believe the unauthorized party potentially had access to a credit application or tax form that contained certain personal information, including your name, address, telephone number, social security number, and credit information.

What We Are Doing? We take the security of your personal information very seriously, and we are enhancing our security measures related to this type of incident. We have retained outside experts to investigate the cause and help us develop additional security measures. Moreover, we have provided new security guidance to our employees to help prevent these types of attacks in the future. The mailing of this notice was not delayed by law enforcement.

In addition, we are offering you complementary credit monitoring for two years through Experian as described below.

DLL Finance LLC
8001 Birchwood Court
PO Box 2000
Johnston, IA 50131
USA

T +1 (866) 222-2478
www.dllfinance.com

DLL has offices in more than 30 countries throughout Europe, North America, South America, Australia and Asia.
The company is part of the Rabobank Group.

What Can You Do

To help protect your identity, we are offering a complimentary two-year membership of Experian's® IdentityWorksSM. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you enroll by: September 30, 2020 (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit> Provide your activation code: [code]

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (877) 890-9332 by September 30, 2020. Be prepared to provide engagement number **DB#####** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

A credit card is not required for enrollment in Experian IdentityWorks.

You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

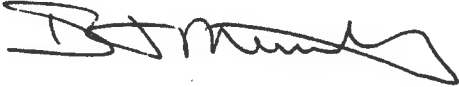
- Experian credit report at signup: See what information is associated with your credit file. Daily credit reports are available for online members only.*
- Credit Monitoring: Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- Identity Restoration: Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- Experian IdentityWorks ExtendCARETM: You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- Up to \$1 Million Identity Theft Insurance^{**}: Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (877) 890-9332. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for two years from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site. Also, please review the enclosed attachment called *Preventing Identity Theft and Fraud* for more information on ways to protect against the potential misuse of your information.

For More Information Again, we take the security of your information in our care seriously, and we regret any inconvenience this incident may cause you. If you have additional questions, please call DLL's customer assistance line at (866) 222-2478 Monday through Thursday from 8 a.m. to 5 p.m. CST and Friday from 8 a.m. to 4:30 p.m. CST.

Sincerely,

A handwritten signature in black ink, appearing to read 'Derek Meinders', written in a cursive style.

Derek Meinders
Vice President Global New Business Development

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Preventing Identity Theft and Fraud

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud or identity theft by, among other things, reviewing your account statements and monitoring credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps to you can take to avoid identity theft. For more information and to contact the FTC, please visit www.ftc.gov/idtheft or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at: Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

Credit Reports: You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting <http://www.annualcreditreport.com>, by calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print a copy of the request form at www.annualcreditreport.com/cra/requestformfinal.pdf.

Alternatively, you may elect to obtain or purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact these national credit reporting agencies to request a copy of your credit report or for general inquiries, including obtaining information about fraud alerts and placing a security freeze on your credit files. Contact information for these agencies is as follows:

Equifax 1-800-349-9960 www.equifax.com P.O. Box 105788 Atlanta, GA 30348	Experian 1-888-397-3742 www.experian.com P.O. Box 9554 Allen, TX 75013	TransUnion 1-888-909-8872 www.transunion.com P.O. Box 2000 Chester, PA 19022
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Fraud Alerts: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at www.annualcreditreport.com.

Credit and Security Freezes: You may have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies using the contact information above.

Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by requesting information in writing from the Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. NW, Washington, DC 20580.

Other Important State Information

You may also file a report with your local police or the police in the community where the identity theft took place. Further, you are entitled to request a copy of the police report filed in this matter.

For California Residents:

You can visit the California Office of Privacy Protection (www.oag.ca.gov/privacy) for additional information on protection against identity theft.

For Iowa Residents:

You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

For Maryland Residents:

You may obtain information about avoiding identity theft at: Office of the State of Maryland Attorney General 200 St. Paul Place Baltimore, MD 21202 1-888-743-0023 www.marylandattorneygeneral.gov.

For New Mexico Residents:

The Fair Credit Reporting Act provides certain rights in addition to the right to receive a copy of your credit report (including a free copy once every 12 months), including the right to ask for a credit score, dispute incomplete or inaccurate information, limit “prescreened” offers of credit and insurance, and seek damages from violators. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

For North Carolina Residents:

You may obtain information about avoiding identity theft at: North Carolina Attorney General’s Office 9001 Mail Service Center Raleigh, NC 27699-9001 919-716-6400 www.ncdoj.gov.

For Rhode Island residents:

You may obtain information about preventing and avoiding identity theft from Rhode Island’s Attorney General Office: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, Phone: (401) 274-4400 www.riag.ri.gov.

For Colorado, Georgia, Maine, Maryland, New Jersey, Puerto Rico and Vermont Residents: You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit bureaus directly to obtain such additional reports.