

EXHIBIT 1

The investigation into this matter is ongoing, and this notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Auto Approve, LLC (“Auto Approve”) does not waive any rights or defenses regarding the applicability of California law, the applicability of the California data event notification statute, or personal jurisdiction.

Nature of the Data Event

On September 15, 2019, a security researcher alerted Auto Approve to a system vulnerability exposed following a standard maintenance release. As a result, certain personal information previously shared with Auto Approve in relation to an auto loan was accessible to external parties for approximately three weeks. Auto Approve has not identified evidence of access to this data, apart from the security researcher and his affiliate. The information that could have been subject to unauthorized access includes: name, address, Social Security number, date of birth, loan information, and vehicle information including make, model, and VIN number.

Notice to California Residents

On or about October 28, 2019, Auto Approve provided written notice of this incident to all affected individuals, which includes nine thousand, five hundred and forty-nine (9,549) California residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, Auto Approve moved quickly to secure the involved information, investigate the full scope of the incident, and notify potentially affected individuals. Auto Approve is also taking additional actions to maximize the security of data its possession. Auto Approve is providing individuals whose personal information was potentially affected by this incident with access to two (2) years of credit monitoring and identity protection services through TransUnion, at no cost to the individuals.

Furthermore, Auto Approve is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Auto Approve is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. Auto Approve is also notifying other regulators as required.

EXHIBIT A



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

RE: Notice of Data Breach

Dear <<Name 1>>:

Auto Approve, LLC (“Auto Approve”) is writing to inform you of an incident that may affect the security of some of your personal information. While Auto Approve is not aware of any actual or attempted identity theft or fraud in relation to the incident, we are providing affected individuals with information about the incident and steps they may take to better protect against the possibility of identity theft or fraud should they feel it is appropriate to do so.

What Happened? On September 15, 2019, a security researcher alerted Auto Approve to a system vulnerability exposed following a standard maintenance release. As a result, certain personal information that you previously shared with Auto Approve, in relation to an auto loan, was accessible to external parties for approximately three weeks. Auto Approve has not identified evidence of access to this data, apart from the security researcher and his affiliate, and is therefore advising you of this incident in an abundance of caution.

What Information Was Involved? Auto Approve determined that the type of information potentially impacted includes your name, address, Social Security number, date of birth, loan information, and vehicle information including make, model, and VIN number.

What We Are Doing. Auto Approve takes the privacy and security of sensitive information in its care very seriously. Once we learned of this incident, we immediately remediated it and re-secured the information.

As an added precaution, we are offering you access to 24 months of complimentary credit monitoring and identity protection services through TransUnion. The cost of this service will be paid for by Auto Approve. Instructions on how to enroll in the credit monitoring and identity protection services can be found in the enclosed *Steps You Can Take to Protect Against Identity Theft and Fraud*.

What Can You Do? You can review the enclosed *Steps You Can Take to Protect Against Identity Theft and Fraud* for additional information on how to better protect against identity theft and fraud. You can also enroll to receive the complimentary credit monitoring and identity protection services described above.

For More Information. We understand that you may have questions about the incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-833-935-1343, Monday through Friday from 8:00 am to 8:00 pm Central Time.

We sincerely apologize for this incident and regret any concern or inconvenience this has caused you.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Marino". The signature is fluid and cursive, with a large initial "K" and "M".

Kevin Marino
Senior Operations Director
Auto Approve, LLC

Steps You Can Take to Protect Against Identity Theft and Fraud

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*myTrueIdentity*) for two years provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies.

How to Enroll: You can sign up online or via U.S. mail delivery.

- To enroll in this service, go to the *myTrueIdentity* website at www.MyTrueIdentity.com and, in the space referenced as “Enter Activation Code,” enter the 12-letter Activation Code <<Insert Unique 12-letter Activation Code>> and follow the three steps to receive your credit monitoring service online within minutes.
- If you do not have access to the Internet and wish to enroll in a similar offline, paper-based credit monitoring service, via U.S. mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the six-digit telephone passcode <<Insert static 6-digit Telephone Pass Code>> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and <<Enrollment Deadline>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

Other Steps You Can Take: We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872
[www.transunion.com/
credit-freeze](http://www.transunion.com/credit-freeze)

Experian
PO Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

Equifax
PO Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
[www.equifax.com/personal/
credit-report-services](http://www.equifax.com/personal/credit-report-services)

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, the addresses where you have lived over the prior five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, military identification, etc.);
7. If you are a victim of identity theft, a copy of either the police report, investigative report or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your file at no cost. An initial fraud alert is a one-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

TransUnion

P.O. Box 2000
Chester, PA 19016
1-800-680-7289
[www.transunion.com/
fraud-victim-resource/
place-fraud-alert](http://www.transunion.com/fraud-victim-resource/place-fraud-alert)

Experian

P.O. Box 2002
Allen, TX 75013
1-888-397-3742
[www.experian.com/fraud/
center.html](http://www.experian.com/fraud/center.html)

Equifax

P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
[www.equifax.com/personal/
credit-report-services](http://www.equifax.com/personal/credit-report-services)

You can further educate yourself regarding identity theft, fraud alerts, security freezes and the steps you can take to protect yourself by contacting the consumer reporting agencies, the Federal Trade Commission or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For North Carolina residents, the Attorney General can be contacted at: 9001 Mail Service Center; Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6400; and www.ncdoj.gov.

For Maryland residents, the Attorney General can be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and www.oag.state.md.us.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; and you may seek damages from violators. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For Rhode Island residents, the Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at www.riag.ri.gov. A total of 270 Rhode Island residents may be impacted by this incident.