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February 26, 2025

Via Online Portal

Nebraska Attorney General
2115 State Capitol
Lincoln, NE 68509

Dear Attorney General Hilgers,

We represent New American Funding, LLC (“New American Funding”) with respect to a data security incident involving the potential exposure of certain personal information described in more detail below. New American Funding is committed to answering any questions you may have about the data security incident and its response.

1. Nature of security incident.

On February 12, 2026, New American Funding was notified by a service provide, Figure Lending, LLC (“Figure”) that it had experienced a security incident that may have impacted New American Funding customer data. New American Funding’s systems and the data stored in those systems (including customer data) were not affected by the incident.

Figure informed New American Funding that on January 28, 2026, a Figure employee was the target of a social engineering attack and allowed an unauthorized actor to download a limited number of files from a Figure account. Figure stated that there was no unauthorized access to customer accounts or funds. However, the accessed files may have contained personal information including names, addresses, Social Security numbers, dates of birth, phone numbers, email addresses, loan account numbers, and loan information.

Figure offered to notify impacted individuals on behalf of New American Funding, which New American Funding subsequently authorized. Figure informed New American Funding on February 24, 2026, that letters were mailing that same day.

2. Number of residents affected.

131 Nebraska residents were notified of the incident. A notification letter was sent to affected individuals on February 24, 2026 (a copy of the form notification letters is attached as Exhibit A).

3. Steps taken in response to the incident.

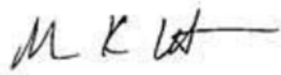
New American Funding reviewed the information provided by Figure in response to this incident and confirmed that Figure has taken appropriate steps to prevent a similar incident in the future. Additionally, Figure notified affected individuals and offered 24 months of credit monitoring and identity protection services through TransUnion.

4. Contact information.

New American Funding takes the security of the information in its control seriously and is committed to ensuring information within its control is appropriately protected. If you have any questions or need additional information, please do not hesitate to contact me at mventrone@clarkhill.com or (312) 360-2506.

Sincerely,

CLARK HILL

A handwritten signature in black ink, appearing to read "M K Ventrone", with a horizontal line extending to the right.

Melissa K. Ventrone
Member

cc: Mariah Leffingwell – mleffingwell@clarkhill.com

U.S. INDIVIDUAL NOTICE - DOB

OVERVIEW: To inform individuals whose data was impacted, following completion of the investigation.

<<DATE>>

Re: Notice of Data Breach | Security Event

[NAME]

Figure Lending Corp and its subsidiaries, Figure Lending LLC, Figure Markets Credit LLC and Figure Payments Corporation (collectively, “We” or “Figure”) are writing to let you know about a security incident that affected your personal information. Figure is a technology-driven lender specializing in blockchain enabled home equity lines of credit and refinancing, and crypto-backed loans. We also provide technology and loan administrative services to other lenders and business partners, which may have included the origination and/or servicing of a loan you have with our business partner lenders.

Please read this notice carefully, as it provides up-to-date information on what happened and what we are doing, as well as information on how you can obtain complimentary credit monitoring and identity restoration services.

What happened?

Recently, Figure discovered unauthorized activity on our systems. We acted quickly to stop the activity and enhance our security measures, and we began working with a leading cybersecurity firm to investigate what happened. We also reported the incident to law enforcement and offered our full cooperation. However, we did identify evidence that on January 28, 2026 data containing personal information was obtained through queries on company databases that store loan and loan inquiry data.

There was no evidence of unauthorized access to customer accounts and funds, and our business operations continue uninterrupted. Additionally, we continuously monitor accounts, which have strong safeguards in place to protect your funds.

What information was involved?

We have determined that your <<insert data fields>> were or may have been obtained. Your Social Security Number was not affected.

What we are doing:

We are committed to safeguarding confidential and sensitive information. We are offering two years of complimentary credit monitoring and identity restoration services through our third-party vendor, TransUnion.

Please see [Attachment A](#) for details regarding these complimentary credit monitoring and identity restoration services, as well as how to enroll with your unique code. **You must enroll by May 31, 2026 to receive these services.**

In addition to these actions, we have implemented enhanced security and monitoring controls. We remain committed to ongoing information security reviews to strengthen our security and privacy programs and controls.

What you can do:

In addition to enrolling in the credit monitoring and identity restoration services being offered to you at no charge, we encourage you to take the following precautions:

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It is always a good idea to remain vigilant against threats of identity theft or fraud and to regularly review and monitor your account statements and credit history for any signs of unauthorized transactions or activity.

If you ever suspect that you are the victim of identity theft or fraud, you can contact your local police. Additional information about how to protect your identity is contained in [Attachment B](#).

For more information:

Figure has established a dedicated call center to answer questions about the security incident as well as the credit monitoring and identity restoration services that we are offering to you. If you have any questions, please call the call center at **PHONE #**, from 8 a.m. to 8 p.m. ET Monday through Friday, excluding major U.S. holidays.

Sincerely,
The Figure Team

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**Attachment A – ADDITIONAL DETAILS REGARDING YOUR 24-MONTH OF TRANSUNION
CREDIT MONITORING SERVICES**

To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by May 31, 2026** (Your code will not work after this date.)
- Visit the TransUnion website to enroll.
 - o For Adults: <https://bfs.cyberscout.com/activate>
 - o For parent-child monitoring: <https://bfs.cyberscout.com/activate>
- Provide your **activation code**: [VARIABLE TEXT]

Attachment B – MORE INFORMATION ABOUT IDENTITY PROTECTION

INFORMATION ON OBTAINING A FREE CREDIT REPORT

U.S. customers are entitled under U.S. law to one free credit report annually from each of the three major credit bureaus. To order your free credit reports, visit www.annualcreditreport.com or call toll-free +1 (877) 322-8228.

INFORMATION ON IMPLEMENTING A FRAUD ALERT OR A SECURITY FREEZE

You can contact the three major credit bureaus at the addresses below to place a fraud alert on your credit report. A fraud alert indicates to anyone requesting your credit file that you suspect you are a possible victim of fraud. A fraud alert does not affect your ability to get a loan or credit. Instead, it alerts a business that your personal information might have been compromised and requires that business to verify your identity before issuing you credit. Although this may cause some short delay if you are the one applying for the credit, it might protect against someone else obtaining credit in your name.

A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit, mortgages, employment, housing, or other services. A credit reporting agency may not charge you to place, temporarily lift, or permanently remove a security freeze.

To place a fraud alert or a security freeze on your credit report, you must contact the three credit bureaus below:

Equifax	Experian	TransUnion
Consumer Fraud Division	Credit Fraud Center	TransUnion LLC
P.O. Box 740256	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30374	Allen, TX 75013	Chester, PA 19022-2000
(888) 766-0008	(888) 397-3742	(800) 680-7289
www.equifax.com	www.experian.com	www.transunion.com

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

- Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
- Social security number;
- Date of birth;
- If you have moved in the past five (5) years, the addresses where you have lived over those prior five (5) years;
- Proof of current address such as a current utility bill or a telephone bill; and
- A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, etc.).

You may also contact the U.S. Federal Trade Commission (FTC) for further information on fraud alerts, security freezes, and how to protect yourself from identity theft. The FTC can be contacted at 400 7th St. SW, Washington, DC 20024; telephone +1 (877) 382-4357 or www.consumer.gov/idtheft.

ADDITIONAL RESOURCES

Your state Attorney General may also have advice on preventing identity theft, and you should report instances of known or suspected identity theft to law enforcement, your state Attorney General, or the FTC.

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California residents: Visit the California Office of Privacy Protection (<https://oag.ca.gov/privacy>) for additional information on protection against identity theft.

District of Columbia residents: The District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; +1 (202) 727-3400, oag@dc.gov and www.oag.dc.gov.

Iowa residents: The Attorney General can be contacted at Office of Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines, Iowa 50319; +1 (515) 281-5164, www.iowaattorneygeneral.gov.

Kentucky residents: The Attorney General can be contacted at Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov, Telephone: +1 (502) 696-5300.

Maryland residents: The Attorney General can be contacted at Office of Attorney General, 200 St. Paul Place, Baltimore, Maryland 21202; +1 (888) 743-0023 or www.marylandattorneygeneral.gov.

Massachusetts residents: Under Massachusetts law, you have the right to obtain any police report filed in connection with the cybersecurity event. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

North Carolina residents: The Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001; +1 (919) 716-6400 or www.ncdoj.gov.

New Mexico residents: You have rights under the federal Fair Credit Reporting Act (FCRA), which governs the collection and use of information pertaining to you by consumer reporting agencies. For more information about your rights under the FCRA, please visit www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf or www.ftc.gov.

New York residents: The Attorney General can be contacted at the Office of the Attorney General, The Capitol, Albany, NY 12224-0341; +1 (800)-771-7755 or www.ag.ny.gov.

Oregon residents: The Attorney General can be contacted at Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096; +1 (877) 877-9392 (toll-free in Oregon), +1 (503) 378-4400, or www.doj.state.or.us.

Rhode Island residents: The Attorney General can be contacted at 150 South Main Street, Providence, Rhode Island 02903; +1 (401) 274-4400 or www.riag.ri.gov. You may also file a police report by contacting local or state law enforcement agencies.

For Arizona, California, Iowa, Montana, Washington and West Virginia 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 report(s).

CONFIDENTIAL

U.S. INDIVIDUAL NOTICE - SSN

<<DATE>>

Re: Notice of Data Breach | Security Event

[NAME]

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What you can do:

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If you ever suspect that you are the victim of identity theft or fraud, you can contact your local police. Additional information about how to protect your identity is contained in [Attachment B](#).

For more information:

Figure has established a dedicated call center to answer questions about the security incident as well as the credit monitoring and identity restoration services that we are offering to you. If you have any questions, please call the call center at **PHONE #**, from 8 a.m. to 8 p.m. ET Monday through Friday, excluding major U.S. holidays.

Sincerely,
The Figure Team

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To place a fraud alert or a security freeze on your credit report, you must contact the three credit bureaus below:

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Consumer Fraud Division	Credit Fraud Center	TransUnion LLC
P.O. Box 740256	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30374	Allen, TX 75013	Chester, PA 19022-2000
(888) 766-0008	(888) 397-3742	(800) 680-7289
www.equifax.com	www.experian.com	www.transunion.com

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

- Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
- Social security number;
- Date of birth;
- If you have moved in the past five (5) years, the addresses where you have lived over those prior five (5) years;
- Proof of current address such as a current utility bill or a telephone bill; and
- A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, etc.).

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Iowa residents: The Attorney General can be contacted at Office of Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines, Iowa 50319; +1 (515) 281-5164, www.iowaattorneygeneral.gov.

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Maryland residents: The Attorney General can be contacted at Office of Attorney General, 200 St. Paul Place, Baltimore, Maryland 21202; +1 (888) 743-0023 or www.marylandattorneygeneral.gov.

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North Carolina residents: The Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001; +1 (919) 716-6400 or www.ncdoj.gov.

New Mexico residents: You have rights under the federal Fair Credit Reporting Act (FCRA), which governs the collection and use of information pertaining to you by consumer reporting agencies. For more information about your rights under the FCRA, please visit www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf or www.ftc.gov.

New York residents: The Attorney General can be contacted at the Office of the Attorney General, The Capitol, Albany, NY 12224-0341; +1 (800)-771-7755 or www.ag.ny.gov.

Oregon residents: The Attorney General can be contacted at Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096; +1 (877) 877-9392 (toll-free in Oregon), +1 (503) 378-4400, or www.doj.state.or.us.

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