CONSTANGY BROOKS, SMITH & PROPHETE LLP

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March 24, 2025

VIA ONLINE SUBMISSION

Attorney General Mike Hilgers
Office of the Attorney General
Consumer Affairs Response Team
2115 State Capital
Lincoln, NE 68509
Tel: 402-471-2683

Re: Notice of Data Event

To Whom It May Concern:

We represent IOU Central, Inc. ("IOU Central"), located at 600 Townpark Ln NW, Suite 100, Kennesaw, Georgia 30144, and are writing to notify your office of an incident that may affect the security of certain personal information relating to approximately fifteen (15) Nebraska residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, IOU Central does not waive any rights or defenses regarding the applicability of Nebraska law, the applicability of the Nebraska data event notification statute, or personal jurisdiction.

1. Nature of the Data Event

On February 10, 2025, IOU Central learned that personal information of certain individuals was potentially accessed without authorization. The unauthorized access was the result of a suspicious event IOU Central first learned of on or about November 26, 2024. IOU Central promptly initiated an investigation of the matter and engaged cybersecurity specialists to assist with the incident response. As a result, IOU Central determined that certain files may have been accessed or acquired without authorization on November 21, 2024. IOU Central undertook a comprehensive review of those files and, on or about February 10, 2025, learned that some sensitive information was contained within the potentially affected data.

The information that could have been subject to unauthorized access varies by individual but may include first and last name, as well as Social Security number / individual taxpayer identification number.

2. Notice to Nebraska Residents

On or about March 24, 2025, IOU Central provided written notice of this incident to approximately two (2) Nebraska residents. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

3. Other Steps Taken and To Be Taken

Upon discovering the event, IOU Central moved quickly to investigate and respond to the incident, assess the security of IOU Central systems, and identify potentially affected individuals. IOU Central is also working to implement additional safeguards and training to its employees. IOU Central is providing access to credit monitoring services for twelve (12) months, through Cyberscout, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, IOU Central is providing impacted individuals with guidance on how to better protect against identity theft and fraud. IOU Central is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, 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.

IOU Central is providing written notice of this incident to relevant state and federal regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

4. Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 336.448.8552.

Very truly yours,

Matthew Toldero

Matt Toldero of
Constangy, Brooks, Smith & Prophete LLP

Exhibit A

IOU Central, Inc
c/o Cyberscout
PO Box 1286
Dearborn, MI 48120-9998

IOU Financial
Business Lending. Simplified.

P
[redacted]

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March 24, 2025

Subject: Notice of Data Security Incident

Dear [redacted]:

IOU Central, Inc. ("IOU Central") is writing to inform you of a recent data security incident that may have affected your personal information. We take the privacy and security of all information within our possession very seriously. Please read this letter carefully as it contains information regarding the incident and steps that you can take to help protect your personal information.

What Happened. On February 10, 2025, we learned that personal information of certain individuals was potentially accessed without authorization. The unauthorized access was the result of a suspicious event we first learned of on or about November 18, 2024. We promptly initiated an investigation of the matter and engaged cybersecurity specialists to assist with the incident response. As a result, we determined that certain files may have been accessed or acquired without authorization beginning on October 18, 2024. We undertook a comprehensive review of those files and, on or about February 10, 2025, learned that some of your personal information was contained within the potentially affected data. Please note, we have no evidence of the misuse, or attempted misuse, of any potentially impacted information.

What Information Was Involved. The information may have included your first and last name as well as Date of Birth; Drivers License / State identification Number.

What We Are Doing. As soon as we learned of this incident, we took the steps described above and implemented measures to enhance security and minimize the risk of a similar incident occurring in the future. In response to the incident, we are providing you with access to Single Bureau Credit Monitoring services at no charge. These services provide you with alerts for twelve (12) months from the date of enrollment when changes occur to your credit file. This notification is sent to you the same day that the change or update takes place with the bureau. Finally, we are providing you with proactive fraud assistance to help with any questions that you might have or in event that you become a victim of fraud. These services will be provided by Cyberscout, a TransUnion company specializing in fraud assistance and remediation services.

What You Can Do. You can follow the recommendations on the following page to help protect your personal information. To enroll in Credit Monitoring services at no charge, please log on to https://bfs.cyberscout.com/activate and follow the instructions provided. When prompted please provide the following unique code to receive services: [redacted]. In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter. The enrollment requires an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity..

For More Information. Further information about how to protect your personal information appears on the following page. If you have questions or need assistance, please call 1-833-998-6744 Monday through Friday from 8 a.m. to 8 p.m. Eastern Time, excluding US holidays. We take your trust in us seriously and appreciate your understanding.

Sincerely,

IOU Central, Inc.

Steps You Can Take to Help Protect Your Personal Information

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and 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 also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (the "FTC").

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Ave, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.consumer.ftc.gov, www.ftc.gov/idtheft.

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting www.annualcreditreport.com, 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 also can contact one of the following three national credit reporting agencies:

Equifax	**Experian**	**TransUnion**
P.O. Box 105851	P.O. Box 9532	P.O. Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19016
1-800-525-6285	1-888-397-3742	1-800-916-8800
www.equifax.com	www.experian.com	www.transunion.com/get-credit-report

Fraud Alert: 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 one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at www.annualcreditreport.com.

Security Freeze: You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

Kentucky Attorney General 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601 www.ag.ky.gov 502-696-5300	**Maryland Attorney General** 200 St. Paul Place Baltimore, MD 21202 www.marylandattorneygeneral.gov/Pages/CPD 888-743-0023	**Oregon Attorney General** 1162 Court St., NE Salem, OR 97301 www.doj.state.or.us/consumer-protection 877-877-9392
California Attorney General 1300 I Street Sacramento, CA 95814 www.oag.ca.gov/privacy 800-952-5225	**NY Bureau of Internet and Technology** 28 Liberty Street New York, NY 10005 www.dos.ny.gov/consumerprotection/ 212.416.8433	**Washington D.C. Attorney General** 400 S 6th Street, NW Washington, DC 20001 oag.dc.gov/consumer-protection 202-442-9828

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Iowa Attorney General	NC Attorney General	Rhode Island Attorney General
1305 E. Walnut Street	9001 Mail Service Center	150 South Main Street
Des Moines, Iowa 50319	Raleigh, NC 27699	Providence, RI 02903
www.iowaattorneygeneral.gov	ncdoj.gov/protectingconsumers/	www.riag.ri.gov
888-777-4590	877-566-7226	401-274-4400
		There were [#] RI residents impacted.

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit: www.consumer.ftc.gov/sites/default/files/articles/pdf/pdf-0096-fair-credit-reporting-act.pdf.