CARDINAL
FINANCIAL COMPANY | LIMITED PARTNERSHIP

January 21, 2021

Via: FedEx
Washington State
Office of the Attorney General
1125 Washington St. SE
PO Box 40100 Olympia WA 98504

Re: **Courtesy Notice of Data Incident**

To Whom it May Concern:

Cardinal Financial Company, Limited Partnership ("Cardinal") was recently informed that one of its vendors had a security breach involving data of Cardinal customers. While a limited amount of personal information of 925 Washington residents was likely taken, because the personal information is limited to first name, last name and date of birth, Cardinal believes there is not a reasonable risk of harm to any of these individuals. Thus, there is no notification requirement pursuant to RSW 19.255.010. Nonetheless, in an effort to be transparent both to your office and affected consumers whose personal information was impacted, we are providing you this courtesy notice as well as to the Washington consumers. The courtesy notice to Washington consumers is attached hereto as **Exhibit A**.

ActiveProspect Inc. ("ActiveProspect") is a vendor retained by Cardinal that conducts quality control of mortgage leads purchased by Cardinal ("Leads"). The Leads contain data provided by consumers interested in residential mortgage loans. At Cardinal's request, Lead providers send purchased Leads directly to ActiveProspect to determine whether the Cardinal purchased Lead is of sufficient quality for Cardinal to accept delivery.

On December 14, 2020 ActiveProspect provided Cardinal with notice that a third party may have exfiltrated data from their systems between November 8 and November 9, 2020. On December 22, 2020 ActiveProspect identified which consumers and data was likely taken. Confirmation of exfiltration of the data was confirmed by a third party forensic report ordered by ActiveProspect and received by Cardinal on January 21, 2021.

Based on Cardinal's analysis of the information ActiveProspect provided, there were 6,010 Washington residents or individuals looking to obtain a mortgage loan for property located in the state of Washington whose information reportedly was exfiltrated.[1] The majority of these entries only

[1] The ActiveProspect list contained 4,788 individuals who listed their home address as Washington, and another 1,238 who did not include state of residence, but disclosed a Washington address for the property associated with the desired loan. The total of these two numbers equals 6,010.

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included non-personal information, such as emails and mortgage loan information. However, of the 6,010 Washington residents, 925 Washington residents' entries included data which under Washington law could be considered personal information - specifically first name, last name, and date of birth. However, no passwords, social security, bank records or any other type of personal information was accessed. In fact, passwords, social security, bank records or any other type of personal information were not maintained in these records at all.

As previously mentioned, concurrently with this notice, Cardinal has notified all of the 925 affected Washington residents and offered them, at no cost, twelve (12) months of NortonLifeLock credit and identity monitoring. Cardinal has also set up a hotline for questions or concerns they may have.

Cardinal does not take for granted the privilege of doing business with the people of the state of Washington. And while we do not believe these courtesy notices are a legal requirement, we believe transparency, particularly in this area of consumer data, is fundamental. Please feel free to contact me directly at 980-201-4113 should you desire any further information.

Sincerely,

Jon Paul, Esq.
SVP, Managing Counsel
Cardinal Financial Company, Limited Partnership

Enclosure:
Washington Resident Notice Letter

Exhibit A

CARDINAL
FINANCIAL COMPANY LIMITED PARTNERSHIP, NMLS 66247

600 Satellite Blvd.
Suwanee, GA 30024

2 2 447 ********AUTO**ALL FOR AADC 980
John Doe
123 Anystreet Dr
Anytown, NY 12345

Re: Notice of Data Breach

January 21, 2021

Cardinal Financial Company ("Cardinal") is writing to provide you a courtesy notification of a recent incident that may affect the security of some of your personal information. While we do not believe we are required to provide this notice under Washington law, we wanted to give you clear information of a data incident that occurred at one of Cardinal's vendors. On or about November 8, 2020 a company that holds data for Cardinal known as ActiveProspect, Inc. experienced a security incident involving acquisition of some of the data in its possession by an unauthorized third party. Cardinal was notified of the scope of the data implicated in this incident on December 22, 2020, at which point Cardinal conducted its own analysis of the incident and data acquired.

Based on Cardinal's analysis some of your information was acquired by the unauthorized third party. No personal data, as defined under Washington law, was taken, other than your first and last name, and date of birth. Other information (email address and information you submitted online in the initial request to be contacted by Cardinal) was also taken. However, no passwords, social security, bank records or any other type of personal information was accessed. In fact, passwords, social security, bank records or any other type of personal information were not maintained in these records at all.

We take this incident very seriously, and this letter provides details about the incident, our response, and steps you may take to better protect against possible misuse of your personal information, should you feel it necessary to do so.

The confidentiality, privacy, and security of your personal information are among our highest priorities. We have taken, and continue to take, steps to prevent this type of incident from happening in the future, including but not limited to suspending service with ActiveProspect and deletion of data from their systems. Further, despite our belief that there is likely no reasonable risk of harm or identity theft arising from this incident, Cardinal is providing this notice and has also notified the Attorney General for the state of Washington.

As an added precaution, we are offering you access to twelve (12) months of complimentary credit and identity monitoring services through NortonLifeLock, Inc. at no cost to you.

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 for the next twelve (12) months. You may also enroll to receive the identity and credit monitoring services we are making available to you as we are unable to enroll in these services on your behalf.

Additional Details About Your Norton LifeLock Credit Monitoring Services

Cardinal has retained NortonLifeLock, Inc. to provide twelve (12) months of complimentary LifeLock Defender™ Choice identity theft protection.

To activate your membership online and get protection at no cost to you:

1. In your web browser, go directly to www.LifeLock.com. Click on the yellow "START MEMBERSHIP" button (do not attempt registration from a link presented by a search engine).
2. You will be taken to another page where, below the FOUR protection plan boxes, you may enter the **Promo Code: DCRDNL2101** and click the "APPLY" button.
3. On the next screen, enter your **Member ID: 0123456789** and click the **"APPLY"** button.
4. Your complimentary offer is presented. Click the red "START YOUR MEMBERSHIP" button.
5. Once enrollment is completed, you will receive a confirmation email (be sure to follow ALL directions in this email).

You will have until March 31st, 2021 to enroll in this service.

Once you have completed the LifeLock enrollment process, the service will be in effect. Your LifeLock Defender™ Choice membership includes:

- ✓ Primary Identity Alert System†
- ✓ 24/7 Live Member Support
- ✓ Dark Web Monitoring**
- ✓ Norton™ Security Deluxe[2] (90 Day Free Subscription)
- ✓ Stolen Funds Reimbursement up to $25,000†††
- ✓ Personal Expense Compensation up to $25,000†††
- ✓ Coverage for Lawyers and Experts up to $1 million†††
- ✓ U.S-based Identity Restoration Team
- ✓ Annual Single-Bureau Credit Reports & Credit Scores[1]**
  The credit scores provided are VantageScore 3.0 credit scores based on Equifax, Experian and TransUnion respectively. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your creditworthiness.
- ✓ One-Bureau Credit Monitoring[1]**
- ✓ USPS Address Change Verification Notifications
- ✓ Fictitious Identity Monitoring
- ✓ Credit, Checking and Savings Account Activity Alerts†**

[1]If your plan includes credit reports, scores, and/or credit monitoring features ("Credit Features"), two requirements must be met to receive said features: (i) your identity must be successfully verified with Equifax; and (ii) Equifax must be able to locate your credit file and it must contain sufficient credit history information. IF EITHER OF THE FOREGOING REQUIREMENTS ARE NOT MET YOU WILL NOT RECEIVE CREDIT FEATURES FROM ANY BUREAU. If your plan also includes Credit Features from Experian and/or TransUnion, the above verification process must also be successfully completed with Experian and/or TransUnion, as applicable. If verification is successfully completed with Equifax, but not with Experian and/or TransUnion, as applicable, you will not receive Credit Features from such bureau(s) until the verification process is successfully completed and until then you will only receive Credit Features from Equifax. Any credit monitoring from Experian and TransUnion will take several days to begin after your successful plan enrollment.
No one can prevent all identity theft or cybercrime. [1] LifeLock does not monitor all transactions at all businesses.
[2] Norton Security Online provides protection against viruses, spyware, malware, and other online threats for up to 5 PCs, Macs, Android devices. Norton account features not supported in this edition of Norton Security Online. As a result, some mobile features for Android are not available such as anti-theft and mobile contacts backup. iOS is not supported.
**These features are not enabled upon enrollment. Member must take action to get their protection.
††† Reimbursement and Expense Compensation, each with limits of up to $25,000 for Defender Preferred. And up to $1 million for coverage for lawyers and experts if needed. Benefits under the Master Policy are issued and covered by United Specialty Insurance Company (State National Insurance Company, Inc. for NY State members). Policy terms, conditions and exclusions at: LifeLock.com/legal.

Monitor Accounts

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:

Experian	**TransUnion**	**Equifax**
P.O. Box 9554	P.O. Box 160	P.O. Box 105788
Allen, TX 75013	Woodlyn, PA 19094	Atlanta, GA 30348-5788
1-888-397-3742	1-888-909-8872	1-800-685-1111
www.experian.com/freeze/center.html	www.transunion.com/credit-freeze	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, provide 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, include 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 1-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:

Experian	**TransUnion**	**Equifax**
P.O. Box 9554	P.O. Box 2000	P.O. Box 105069
Allen, TX 75013	Chester, PA 19016	Atlanta, GA 30348
1-888-397-3742	1-800-680-7289	1-888-766-0008
www.experian.com/fraud/center.html	www.transunion.com/fraud-victim-resource/place-fraud-alert	www.equifax.com/personal/credit-report-services

Additional Information

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, DC 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 also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

If you have additional questions, please call our call center at 866-979-0391 (toll free), between the hours of 8:00AM – 8:00PM Eastern Time. You may also contact us by writing to us at 3701 Arco Corporate Drive, Suite 200, Charlotte, NC 28273, Attn: Consumer Advocacy.

Cardinal takes the privacy and security of the personal information in our care seriously. Please let us know if you have any questions.

Sincerely,

Webb Deneys
Chief Information Security Officer