

Celtic Bank
P.O. Box 3220
Buffalo, NY 14240



[Date]

[Name]
[Address]

NOTICE OF DATA BREACH

Thank you for being a valued customer of Celtic Bank's {Brand} credit card, serviced by Continental Finance Company, LLC. We sincerely regret to inform you that, after completing a thorough internal investigation, some of your personal data may have been put at risk during a recent update to the CFC Mobile Application. Continental Finance Company has taken the steps necessary to eliminate the threat to your personal data and implemented improvements to prevent such incidents from occurring in the future.

WHAT HAPPENED

On September 30, 2019, we were first alerted to this issue and expediently launched an investigation into the CFC Mobile Application. We determined that a programming error within an update to the mobile application enabled a limited number of users to view, among other information, the routing and account numbers of personal bank accounts associated with other users.

We confirmed that the error was fixed by approximately 9:00 a.m. (Eastern Time) on September 30, 2019.

WHAT INFORMATION WAS INVOLVED

The types of personal information that may have been exposed include the mobile application users' first and last name, addresses, email addresses, phone numbers, bank names, bank routing numbers, bank account numbers, payment information, recent transactions, balances, and monthly billing statements. Your {Brand} credit card numbers were not exposed in anyway and your {Brand} credit card remains secure. In addition, your date of birth and Social Security number were not exposed in anyway and remain secure.

WHAT WE ARE DOING

We have enhanced the mobile application's security measures and will conduct ongoing testing and monitoring to protect against future incidents.

WHAT YOU CAN DO

In addition to reviewing the items discussed below, we encourage you to remain vigilant for at least the next twelve to twenty-four months about any suspicious activity involving your personal information and promptly report such activity. If you suspect identity theft, you should file reports with your State Attorney General and the U.S. Federal Trade Commission, as discussed below.

WHAT YOU SHOULD DO

Since your personal information may have been compromised, you should consider going to your bank and closing your existing account(s) and opening a new one. Please also notify any vendors for which you have automatic payments tied to the account(s) you are closing. If you choose not to close your bank account(s), we encourage you to remain vigilant for at least the next twelve to twenty-four months about routinely monitoring your account activity for any suspicious activity and promptly report such activity to your financial institution. If you suspect identity theft, you should file reports with your State Attorney General and the U.S. Federal Trade Commission, as discussed below.

RESOURCES AND OTHER IMPORTANT INFORMATION

Please consider the following resources and additional information:

- You may wish to visit the website of the U.S. Federal Trade Commission at <http://www.consumer.ftc.gov/features/feature-0014-identity-theft> or reach the FTC at 877-382-4357 or 600 Pennsylvania Avenue, NW, Washington, DC 20580 for further information about how to protect yourself from identity theft. 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, and the FTC.
- You may have the right to file a police report and obtain a copy of it if you are the victim of identity theft.
- U.S. residents 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 report, visit www.annualcreditreport.com or call toll-free 877-322-8228.
- You can request information regarding “fraud alerts” and “security freezes” from the three major U.S. credit bureaus listed below. At no charge, if you are a U.S. resident, you can have these credit bureaus place a “fraud alert” on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. This service can make it more difficult for someone to get credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it also may delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. A “security freeze” generally prohibits the credit reporting agency from releasing your credit report to or any information from it without your written authorization. You should be aware that placing a security freeze on your credit account may delay or interfere with the timely approval of any requests that you make for new loans, credit, mortgages, or other services. Unlike fraud alerts, to obtain a security freeze, you must send a written request to each of the three major reporting agencies and you may be required to provide information such as your: (1) name; (2) Social Security number; (3) date of birth; (4) current address; (5) address over the past five years; (6) proof of current address; (7) copy of government identification; and (8) any police investigative report or complaint. Should you wish to place a fraud alert or security freeze, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.
 - Experian: 888-397-3742; www.experian.com; P.O. Box 9554 Allen, TX 75013
 - Equifax: 800-525-6285; www.equifax.com; P.O. Box 105788, Atlanta, GA 30348
 - TransUnion: 800-680-7289; www.transunion.com; Fraud Victim Assistance Division, P.O. Box 2000, Chester, PA 19022-2000

- You may have relevant rights under the federal Fair Credit Reporting Act. For more information, please see the U.S. Federal Trade Commission's bulletin on Fair Credit Reporting Rights available here: <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>

ACCOUNT CREDIT

To assist you, we are automatically providing a \$150 account credit, applied directly to your {Brand} credit card, to cover credit monitoring services or costs related to closing existing account(s) and opening a new bank account. You can expect to receive your account credit within the next 30 days.

FOR MORE INFORMATION

If you have further questions or concerns, please contact us at 1-877-215-2894, Monday through Friday from 8:00 a.m. to 10:00 p.m. and Saturday 8:00 a.m. to 4:00 p.m. Eastern Time, excluding major U.S. holidays.

Sincerely,

Continental Finance Company, LLC (on behalf of Celtic Bank)