

**UNITED STATES OF AMERICA  
BEFORE THE CONSUMER FINANCIAL PROTECTION BUREAU**

IN THE MATTER OF ENOVA  
INTERNATIONAL, INC.

**DECLARATION OF CYNTHIA HAYWARD IN SUPPORT OF ENOVA  
INTERNATIONAL INC.'S SUPPLEMENTAL REQUEST FOR CONFIDENTIAL  
TREATMENT**

I, Cynthia Hayward, under penalty of perjury, hereby state as follows:

1. I am currently employed by Enova Financial Holdings, LLC, an indirect subsidiary of Enova International, Inc., as a Technology Senior Manager I. I have been employed by Enova in my current position since May 2017.

2. In my position, I am familiar with Enova's policies and customary practices regarding the disclosure of information concerning its business operations. This declaration is based on personal knowledge and information learned in the course of my employment at Enova.

3. The Petition to Modify the Civil Investigative Demand Served on Enova International, Inc. ("Petition"), and supporting Declaration of Gaurav Devasthali ("Petition Declaration") contain information that it is Enova's custom and practice to kept private.

4. It is Enova's custom and practice to keep information regarding its proprietary processes concerning the technology and functionality of the NetCredit and CashNetUSA platforms private. Such information includes [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

This information is kept private by Enova in the ordinary course of business.

5. It is also Enova's custom and practice to keep information regarding the

customized servicing protocols used by NetCredit and CashNetUSA private. Such information includes [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. This information is kept private by Enova in the ordinary course of business.

6. Enova also has a custom and practice of keeping information regarding NetCredit's and CashNetUSA's payment processing operations, including their relationships with third-party vendors, private. Such information includes [REDACTED]

[REDACTED]. This information is reflected in Enova's confidential contracts with third-party vendors and is kept private by Enova in the ordinary course of business.

7. Enova views the information regarding its system architecture and each of its elements, platforms and vendor contracts as part of its competitive advantage over other companies in the market place. Releasing any of this information into the public domain would damage Enova's competitiveness in the market while also hurting Enova's ability to maintain its relationships with payment gateway and processing companies..

8. Enova employs various measures to protect the aforementioned information from unauthorized disclosure, such as: (a) requiring that employees and business partners enter into confidentiality agreements; (b) using restrictive markings on documents and communications; (c) employing secure IT networks that are password protected and/or encrypting information; and/or (d) limited access to such commercial information on a "need to know" basis.

9. In addition, [REDACTED]  
[REDACTED]. The level is used to determine who is permitted to access the data, the level of protection that must be applied, and the appropriate transport, storage, and destruction methods. The [REDACTED]

[REDACTED]

[REDACTED] Such information is not accessible by the public and includes, but is not limited to, network diagrams, company policies and processes, product plans, platform and system information, application source code and contracts.

10. To the best of my knowledge, the various protective measures described above that Enova takes to protect its confidential commercial information have proven effective in preventing the information described above from becoming publicly available, obtainable, available, or readily ascertainable anywhere outside of Enova. I am not aware, and to the best of my knowledge do not believe, that any of the information addressed in this declaration is publicly available.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: September 30, 2021

Cynthia Hayward  
Cynthia Hayward