



## K. Dailey Wilson

May 30th, 2024

### Professional Experience



Dailey is a trusted advisor to financial services providers, specifically in the fields of federal and state regulatory compliance. As a partner in our Tennessee office, she assists lease-purchase providers and other financial institutions with:

- Drafting consumer-facing documentation, including applications, lease-purchase agreements, loan agreements, and servicing and collection notices.
- Developing internal policies and procedures addressing compliance with both state and federal consumer protection laws for a variety of industries.
- Conducting compliance audits and due diligence reviews for state and federal law adherence in the lease-purchase and alternative consumer financial services space.

Dailey also advises clients on compliance with other consumer privacy and protection issues, including data security laws, data breach laws, and laws regarding consumer reporting. She works closely with clients to develop comprehensive data security strategies, covering risk assessments, information security programs, written incident response plans, vendor management, and due diligence as well as assisting clients with responses to data breaches.

Her commitment to professional and community involvement includes serving on the Alumnae Council for Girls Preparatory School in Chattanooga, TN.

Dailey's knowledge in regulatory compliance at both the state and federal level and her keen eye for detail makes her an essential resource for businesses navigating the complex landscape of consumer protection law.

Dailey earned her J.D. from the University of Georgia School of Law, graduating *cum laude*. Dailey also holds a Bachelor of Arts in History from the College of Charleston, where she graduated *magna cum laude*.

Outside of her legal practice, Dailey enjoys spending time with her husband and three daughters, reading untold numbers of books on her Kindle, and cheering on the Dawgs.

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### Practice Areas

### **Professional Affiliations & Certifications**

- Member, American Bar Association
- Member, Georgia Bankers Association, Bank Counsel Section
- Member, Alumnae Council, Girls Preparatory School

### **Speaking Engagements**

- “2025 Update on Small Dollar Lending and Rent-to-Own,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, November 2025
- “Who’s Afraid of Little Old State Law: Strategies for Managing Your State Law Compliance,” 2025 Mid-Year Legislative & Regulatory Conference, PBSA, March 2025
- “Click-to-Cancel: A Brief Primer on FTC Rulemaking, CFPB Guidance and State Auto Renewal Laws,” Hudson Cook Compliance Coffee Break, February 2025
- “Lessons Learned from Federal Regulatory Actions,” RTO World, APRO, August 2024
- “The CFPB Payments Rule: Is it Time to Comply?,” INFiN Webinar, January 2024
- “FTC Amends Safeguards Rule Requiring New Data Breach Notification,” CDIA Webinar, November 2023
- “Reporting a Data Breach: FTC Amendment to the Safeguards Rule,” ADCO Webinar, November 2023
- “Data Security in Consumer Financial Services,” MoneyTrends 2023, INFiN, October 2023
- “Don’t be a Cybersecurity Headline: Prioritizing Privacy and Protecting Your Customer Information,” RTO World, APRO, August 2023
- “Data Privacy and Data Security – What Every Compliance Professional Should Know,” OLA Compliance U, July 2023
- “Lessons from FTC Data Security Actions,” Hudson Cook Compliance Coffee Break, March 2023
- “Stop, Collaborate, and Listen: Strategies for Handling Consumer Complaints,” 2022 PBSA Annual Conference, PBSA, September 2022
- “Financial Services Law I,” AFSA Education Foundation: THE EDGE, June 2022
- “Safeguards Rule Roundtable,” ADCO Webinar, February 2022
- “FTC Expands Safeguards Rule to Address Cybersecurity Risks & Privacy,” CDIA Webinar, December 2021
- “Financial Services Law I,” AFSA’s THE EDGE, September 2021
- “Serving consumers with limited English proficiency (LEP),” Hudson Cook Compliance Coffee Break, June 2021

- “Serving Limited English Proficiency (LEP) Customers: What CFPB’s New LEP Guidelines Mean for Your Company,” OLA Compliance University, May 2021
- “Financial Services Law I,” AFSA’s THE EDGE, June 2019
- “Accommodating vulnerable consumers: dissecting complex legal issues regarding the accessibility of financial products and services,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2019
- “Update on small dollar lending and alternative financial services,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2019

## Publications

- “CDK Data Breach: Lessons in Information Security and Third-Party Oversight,” *Spot Delivery*, August 2024
- “So Long, Farewell: Compliance Issues Facing Small-Dollar Lenders in 2023,” *The Business Lawyer*, Vol. 79, Spring 2024, co-authored with Andrea Cottrell, Justin Hosie, and Christopher Capurso
- “Data Security Déjà vu: FTC Finalizes Notification Event Amendment to Safeguards Rule,” Hudson Cook *Insights*, December 2023
- “No One Is Safe: Lessons from the CFPB Data Security Incident,” *Spot Delivery*, May 2023
- “Spotlight on ‘Abusive’ Practices—The CFPB’s Policy Statement and What It Means for Your Business,” *Spot Delivery*, May 2023, co-authored with Gabriela Chambi
- “The Gathering Storm: Compliance Issues Facing Small-Dollar Lenders in 2022,” *The Business Lawyer*, Vol. 79, Spring 2023, co-authored with Andrea Cottrell, Justin Hosie, and Christopher Capurso
- “Four (or Fewer) Thoughts on the CFPB and Buy Now, Pay Later: A Review of ‘Consumer Use of Buy Now, Pay Later’”, Hudson Cook *Insights*, March 2023
- “Seller Beware: Avoiding Negative Attention on Your Negative Option Contracts,” Hudson Cook *Insights*, December 2022, co-authored with Justin Hosie
- “Connecticut Governor Signs Nation’s Fifth Comprehensive Consumer Data Privacy Law,” *Business Law Today*, June 2022
- “Breaking Down the FTC’s Hard-Press Against CafePress: Five Takeaways from the Recent FTC Action,” Hudson Cook *Insights*, April 2022, co-authored with Francis Conlon
- “The FTC’s Sweeping Changes to the Safeguards Rule – Time to Reexamine Your Information Security Program,” *Tennessee Dealer News*, Winter 2022
- “Is it time to ‘tune up’ your compliance with the Fair Credit Reporting Act (‘FCRA’)?” *Tennessee Dealer News*, Fall 2021, co-authored with Ronald D. Gorsline
- “Colorado Governor Signs Nation’s Third Comprehensive Consumer Data Privacy Law,” Hudson Cook *Insights*, August 2021, co-authored with Webb McArthur
- “Equality in Credit Decisions – “Sex” DOES include Sexual Orientation and Gender

- Identity,” *Tennessee Dealer News*, Spring 2021, co-authored with Erica A.N. Kramer
- “Tik Tok: The Compliance Clock Is Ticking for Small-Dollar Lenders in 2020,” *The Business Lawyer*; Vol. 76, Spring 2021, co-authored with Justin B. Hosie, Erica A.N. Kramer, Andrea S. Cottrell, Christopher J. Capurso and Hurshell K. Brown
  - “FTC Staff Report on Buying and Financing Cars: Part II,” *Tennessee Dealer News*, Winter 2021, co-authored with Ronald D. Gorsline
  - “FTC Staff Report on Buying and Financing Cars: Part I,” *Tennessee Dealer News*, Fall 2020, co-authored with Ronald D. Gorsline
  - “It’s the Final Countdown: The Small Dollar Rule’s Looming Compliance Date,” *Hudson Cook Insights*, September 2020
  - “Is Your Ad Clear and Conspicuous? Apparently it Depends.,” *Tennessee Dealer News*, Summer 2020, co-authored with Ronald D. Gorsline
  - “Equality in Credit Decisions – Does ‘Sex’ include Sexual Orientation and Gender Identity?” *Hudson Cook Insights*, July 2020, co-authored with Erica A.N. Kramer
  - “Small Dollar Lending Regulation in 2019,” *The Business Lawyer*; Vol. 75, Spring 2020, co-authored with Justin B. Hosie, Erica A.N. Kramer, and Christopher J. Capurso
  - “Are you repossessing responsibly?,” *Tennessee Dealer News*, Nov/Dec 2019, co-authored with Ronald D. Gorsline
  - “FTC’s Rules of the Road for Advertising: A Five-Point Inspection,” *Spot Delivery*, September 2019, co-authored with Erica A.N. Kramer
  - “Does Your Credit Application Need a Tune-Up?,” *Tennessee Dealer News*, Spring 2019, co-authored with Ronald D. Gorsline
  - “The Walking Dead: 2018 Small Dollar Lending Updates – Is the Small Dollar Loan Industry Mostly Dead or Slightly Alive?,” *74 Bus. Law 553*, Spring 2019, co-authored with Justin B. Hosie, Erica A.N. Kramer and Andrea S. Cottrell
  - “How Artful Drafting and Good Compliance Practices Can Save Contracts from an Untimely Death,” *Hudson Cook Insights*, December 2018, co-authored with Blake Sims
  - “Attacks on Payday Lending: Ballot Initiatives, Legislation, and Attorney General Enforcement,” *Hudson Cook Insights*, November 2018, co-authored with Catharine Andricos
  - “Choice-of-Law Clauses in Online Loans with Consumers,” *24 No. 11 Westlaw Journal Bank and Lender Liability 01*, October 2018, co-authored with Justin B. Hosie
  - “Stranger Things: Small-Dollar Lending Updates and the Arrival of a Final Rule,” *The Business Lawyer*, Spring 2018, co-authored with Justin B. Hosie and Erica A.N. Kramer
  - “2016 Small-Dollar Lending Update: An Obituary or a Re-Awakening,” *The Business Lawyer*, Spring 2017, co-authored with Catherine M. Brennan, Justin B. Hosie and Erica A.N. Kramer
  - “Death by a Thousand Cuts: Update on Small-Dollar Lending,” *71 Bus. Law 741*. Spring 2016, co-authored with Catherine M. Brennan, Justin B. Hosie and Erica A.N. Kramer

