



**Brown Winick**  
ATTORNEYS AT LAW®

Brown, Winick, Graves, Gross,  
Baskerville and Schoenebaum, P.L.C.

666 Grand Avenue, Suite 2000  
Ruan Center, Des Moines, IA 50309-2510

June 11, 2018

**Sent via US Mail**

Consumer Protection Division  
Security Breach Notifications  
1305 E. Walnut Street  
Des Moines, IA 50319

Re: Security Breach Notification

To whom it may concern:

This firm represents Marion County Bank in Pella, Iowa. This letter is intended to notify you of a security breach that occurred at Marion County Bank and involved the personal information of five thousand five hundred ninety-eight (5,598) Iowa residents.

**WHAT HAPPENED?**

A single bank employee email account was compromised on April 5, 2018, by an unknown and unauthorized person spoofing the identity of a different banker at a different bank. An investigation immediately began to determine if any account or other confidential information could have been compromised or stolen. Marion County Bank's investigation concluded that the unauthorized person did not have access to any bank or customer financial accounts and that no money was stolen. We did not find any evidence that the email account was used to extract any information that was in that email account. However, the bank decided to provide notifications because forensic information could not prove that the unauthorized person did not extract information in the e-mail account. The Pella Police Department case number is P201800264. The unauthorized person that caused the compromise of the single Office 365 account was using an IP address from Nigeria. This matter was also reported to the Iowa Department of Banking and the FDIC.

**WHAT INFORMATION WAS INVOLVED?**

The email account that was compromised included a document with the names, addresses, social security numbers and bank account numbers of five thousand five hundred ninety-eight (5,598) Iowa residents. No other personal information was in the compromised email account. No PIN numbers or passwords were exposed in this event. Marion County Bank is making sure that

RECEIVED  
18 JUN 15 AM 7:38  
CONSUMER PROTECTION DIV.

nobody can get access to any funds of any person by just using an account number and name without proving their identity for both online and in-person banking.

**WHAT WE ARE DOING**

Marion County Bank values its customers' privacy and deeply regrets that this incident occurred. Marion County Bank has implemented additional security measures and training designed to prevent a recurrence and to better protect the privacy of our valued customers.

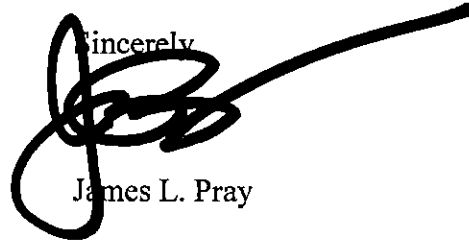
**NOTICE SENT TO IOWA RESIDENTS**

Marion County Bank sent one of the two enclosed template notices enclosed with this letter via US Mail to all Iowa residents that were affected by the breach on June 8, 2018. Accounts that had a social security number that was potentially exposed are being offered one year of free credit monitoring.

**FOR MORE INFORMATION**

If you have any questions or concern, please call 515-242-2404 between 9:00a.m. – 4:30 p.m.

Sincerely

A handwritten signature in black ink, appearing to read 'James L. Pray', with a long horizontal stroke extending to the right.

James L. Pray

DATE

«First\_Name» «Last\_Name»

«Address»

«CITY» «STATE» «ZIP»

Reference #102

**SSN# TEMPLATE  
1 YEAR OF CREDIT  
MONITORING**

Dear «First\_Name»,

We value your business and respect the privacy of your information, which is why, as a precautionary measure, we are writing to let you know about a data security incident that may involve unauthorized access to your private account and identification information.

### **WHAT HAPPENED?**

A single bank employee email account was compromised on April 5, 2018, by an unknown and unauthorized person. An investigation immediately began to determine if any account or other confidential information could have been compromised or stolen. Our investigation concluded that the unauthorized person did not have access to any bank or customer financial accounts and that no money was stolen. We did not find any evidence that the email account was used to extract any information that was in that email account. However, out of an abundance of caution, we want to alert you that certain information available in that email account was exposed to the unauthorized person.

### **WHAT INFORMATION WAS INVOLVED?**

The email account that was compromised included a document with your name, address, bank account number, and social security number. No other personal information was in the compromised email account. No PIN numbers or passwords were exposed in this event. Your accounts are safe and we are making sure that nobody can get access to your funds just using your account number, social security number and name without proving their identity for both online and in-person banking.

### **WHAT WE ARE DOING**

Marion County Bank values your privacy and deeply regrets that this incident occurred. We have implemented additional security measures and training designed to prevent a recurrence and to better protect the privacy of our valued customers.

### **FOR MORE INFORMATION**

For further information and assistance, please contact any Customer Service Representative at 641-628-2191 between 9:00 a.m. - 4:30 p.m.

## NOTIFY LAW ENFORCEMENT OF SUSPICIOUS ACTIVITY

As a precautionary measure, we recommend that you remain vigilant by reviewing your personal accounts. If you detect any suspicious activity on any account you should promptly notify Marion County Bank. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, including the Iowa Attorney General's office 1-888-777-4590 and the Federal Trade Commission (FTC).

To report fraudulent activity with the FTC, go to [IdentityTheft.gov](http://IdentityTheft.gov) or call 1-877-ID-THEFT (877-438-4338). Reports filed with the FTC will be added to the FTC's Identity Theft Data Clearinghouse, which is a database made available to law enforcement agencies.

## WHAT WE ARE DOING TO PROTECT YOUR INFORMATION

To help protect your identity, we are offering a complimentary one-year membership of Experian's® IdentityWorks<sup>SM</sup>. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: September 30, 2018** (Your activation code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your **activation code**: «CODE»

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **877-890-9322** by September 30, 2018. Be prepared to provide engagement number **DB07196** as proof of eligibility for the identity restoration services by Experian.

We also recommend that you obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com>, calling toll-free 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 can access the request form at <https://www.annualcreditreport.com/requestReport/requestForm.action>. Or you can elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is provided below:

Equifax  
(800) 685-1111  
[www.equifax.com](http://www.equifax.com)  
P.O. Box 740241  
Atlanta, GA 30374

Experian  
(888) 397-3742  
[www.experian.com](http://www.experian.com)  
P.O. Box 4500  
Allen, TX 75013

TransUnion  
(800) 888-4213  
[www.transunion.com](http://www.transunion.com)  
TransUnion LLC  
P.O. Box 1000

Chester, PA 19016

Again, we apologize for this incident.

Sincerely,

A handwritten signature in black ink, appearing to read "St. Vincent", written in a cursive style.

President and CEO  
Marion County Bank

**ADDITIONAL DETAILS REGARDING YOUR 12 MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:**

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- ♣ **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.\*
- ♣ **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- ♣ **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- ♣ **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- ♣ **Up to \$1 Million Identity Theft Insurance\*\*:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at **877-890-9322**. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for one year from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration). You will also find self-help tips and information about identity protection at this site.

\* Offline members will be eligible to call for additional reports quarterly after enrolling

\*\* Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions

DATE

•  
• «First\_Name» «Last\_Name»  
• «Address»  
• «CITY» «STATE» «ZIP»

**ACCT # ONLY  
TEMPLATE**

Reference #100

Dear «First\_Name»,

We value your business and respect the privacy of your information, which is why, as a precautionary measure, we are writing to let you know about a data security incident that may involve unauthorized access to your private account and identification information.

### **WHAT HAPPENED?**

A single bank employee email account was compromised on April 5, 2018, by an unknown and unauthorized person. An investigation immediately began to determine if any account or other confidential information could have been compromised or stolen. Our investigation concluded that the unauthorized person did not have access to any bank or customer financial accounts and that no money was stolen. We did not find any evidence that the email account was used to extract any information that was in that email account. However, out of an abundance of caution, we want to alert you that certain information available in that email account was exposed to the unauthorized person.

### **WHAT INFORMATION WAS INVOLVED?**

The email account that was compromised included a document with your name, address and bank account number. None of your other personal information was in the compromised email account. No PIN numbers or passwords were exposed in this event. Your accounts are safe and we are making sure that nobody can get access to your funds just using your account number and name without proving their identity for both online and in-person banking.

### **WHAT WE ARE DOING**

Marion County Bank values your privacy and deeply regrets that this incident occurred. We have implemented additional security measures and training designed to prevent a recurrence and to better protect the privacy of our valued customers.

### **FOR MORE INFORMATION**

For further information and assistance, please contact any Customer Service Representative at 641-628-2191 between 9:00 a.m. - 4:30 p.m.

### **NOTIFY LAW ENFORCEMENT OF SUSPICIOUS ACTIVITY**

As a precautionary measure, we recommend that you remain vigilant by reviewing your personal accounts. If you detect any suspicious activity on any account you should promptly notify Marion County Bank. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, including the Iowa State General Attorney's office 1-888-777-4590 and the Federal Trade Commission (FTC).

To report fraudulent activity with the FTC, go to [IdentityTheft.gov](http://IdentityTheft.gov) or call 1-877-ID-THEFT (877-438-4338). Reports filed with the FTC will be added to the FTC's Identity Theft Data Clearinghouse, which is a database made available to law enforcement agencies.

We recommend that you obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com>, calling toll-free 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 can access the request form at <https://www.annualcreditreport.com/requestReport/requestForm.action>. Or you can elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is provided below:

Equifax  
(800) 685-1111  
[www.equifax.com](http://www.equifax.com)  
P.O. Box 740241  
Atlanta, GA 30374

Experian  
(888) 397-3742  
[www.experian.com](http://www.experian.com)  
P.O. Box 4500  
Allen, TX 75013

TransUnion  
(800) 888-4213  
[www.transunion.com](http://www.transunion.com)  
TransUnion LLC  
P.O. Box 1000  
Chester, PA 19016

Again, we apologize for this incident.

Sincerely,



President and CEO  
Marion County Bank