



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

Josh Brian
Office: (267) 930-2405
Fax: (267) 930-4771
Email: JBrian@mullen.law

3001 N. Rocky Point Drive East, Suite 200
Tampa, FL 33607

November 16, 2023

VIA E-MAIL

Office of the Attorney General of Iowa
Consumer Protection Division
Security Breach Notifications
1305 E. Walnut Street
Des Moines, IA 50319-0106
E-mail: consumer@ag.iowa.gov

Re: Notice of Data Event

To Whom It May Concern:

We represent Systems East, Inc. (“SEI”) located at 50 Clinton Avenue, Cortland, NY 13045, and write to notify your office of a matter that may affect the security of certain information relating to approximately one thousand forty-eight (1,048) Iowa residents. This notice may be supplemented if any new, significant facts are learned subsequent to its submission. By providing this notice, SEI does not waive any rights or defenses regarding the applicability of Iowa law, the applicability of the Iowa data event notification statute, or personal jurisdiction.

Nature of the Data Event

On August 25, 2023, an unknown individual temporarily accessed certain systems on SEI’s computer network, which was identified and stopped the same day. In response, SEI undertook a review of what occurred and identified that an unknown individual copied an encrypted database file that contained payment cardholders’ names, card numbers, and expiration dates. SEI was unable to confirm whether the unknown individual could decrypt the information. It should be noted, however, that the database file did **not** contain additional information normally required to process a payment card transaction, including address or contact information, card verification value or security code, or magnetic stripe data.

Notice to Iowa Residents

On or about November 16, 2023, SEI provided written notice of this matter to approximately one thousand forty-eight (1,048) Iowa residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

After identifying this matter, SEI completed an investigation, including identifying contact information for the potentially affected individuals, and notified the Card Brands to assist with monitoring the payment cardholders' card numbers. SEI is also evaluating its technical security measures and policies to mitigate the risk of a matter like this reoccurring.

Additionally, SEI is providing impacted individuals with guidance on how to better protect against identity theft and fraud. SEI is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

SEI is providing written notice of this matter to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification or other aspects of this matter, please contact us at (267) 930-2405.

Very truly yours,



Josh Brian of
MULLEN COUGHLIN LLC

JPB/bxn
Enclosure

EXHIBIT A



Secure Processing Center
P.O. Box 3826
Suwanee, GA 30024

<<Name 1>> <<Name 2>>
<<Address 1>><<Address 2>>
<<City>><<State>><<Zip>>

<<Date>>

<<Extra1>>

Dear <<Name 1>> <<Name 2>>:

Systems East provides e-payment solutions and online payment processing services. We write to inform you of a matter that may involve your payment card information. This correspondence provides you with information about this matter, our response, and steps you may take should you feel it is appropriate to do so. Please note that this matter does **not** affect your Social Security number or driver's license or other government identification number, as we do not receive or maintain that information.

What Happened and What Information Was Involved? On August 25, 2023, an unknown individual temporarily accessed certain systems on our computer network, which was identified and stopped the same day. In response, we undertook a review of what occurred and identified that an unknown individual copied an encrypted database file that contained your name and payment card information. We cannot confirm whether the unknown individual could decrypt that information. Please note, the database file did **not** contain additional information normally required to process a payment card transaction, including address or contact information, card verification value or security code, or magnetic stripe data.

What We Are Doing. We notified the payment card providers (Visa, Mastercard, American Express, and Discover) about this matter so they could take steps to monitor your payment card information. We are also notifying you about this matter so you can take steps to monitor your payment card information. Additionally, we are evaluating our technical security measures and policies and have implemented enhancements to mitigate the risk of a matter like this reoccurring.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. You may also review the "Steps You Can Take To Protect Personal Information" section of this letter to learn more about free resources that are available to assist you with protecting your information.

For More Information. If you have questions about this matter, you may contact our toll-free dedicated assistance line at 1-888-983-0276 from 9 a.m. through 9 p.m. Eastern Time, Monday through Friday. You may also contact us by mail at Systems East, Inc., Attn: Director of Operations, 50 Clinton Ave., Cortland, NY 13045.

Sincerely,

Systems East, Inc.

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to 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, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-800-916-8800
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect their personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been

a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street NW, Washington, DC 20001; 1-202-727-3400; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov>.

For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active-duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage consumers to review their rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; and <https://ag.ny.gov>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; 1-401-274-4400; and www.riag.ri.gov. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this matter. There are approximately <<#>> Rhode Island residents that may be affected by this event.