



MULLEN  
COUGHLIN<sub>LLC</sub>  
ATTORNEYS AT LAW

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40 Burton Hills Boulevard, Suite 200  
Nashville, TN 37215

November 2, 2022

**VIA E-MAIL**

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

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent Ethos Group, Inc. (“Ethos”), located at 370 W. Las Colinas Boulevard, Suite 108, Irving, TX 75039, and are writing to notify your office of an incident that may affect the security of certain personal information relating to approximately ninety-one thousand four hundred forty (91,440) Iowa residents. This notice may be supplemented if any new significant facts are learned subsequent to its submission. By providing this notice, Ethos 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 1, 2022, Ethos identified suspicious activity on a server in its network. Ethos immediately launched an investigation, with the assistance of third-party cybersecurity specialists, to confirm the nature and scope of the activity. The investigation determined an unknown actor may have viewed or taken certain data from Ethos’ environment between July 30, 2022 and July 31, 2022. Accordingly, Ethos completed a comprehensive review, with third-party vendor support, of all the data that could have been potentially viewed or taken. Ethos completed this review on or about October 24, 2022.

The information that could have been subject to unauthorized access includes name and driver’s license number.

### **Notice to Iowa Residents**

On or about November 2, 2022, Ethos began providing written notice of this incident to approximately ninety-one thousand four hundred forty (91,440) 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**

Upon discovering the event, Ethos moved quickly to investigate and respond to the incident, assess the security of Ethos' systems, and identify potentially affected individuals. Ethos is also working to implement additional safeguards and training to its employees.

Additionally, Ethos is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud. Ethos is providing individuals with information on how to place a fraud alert and credit 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.

Ethos is providing written notice of this incident 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 the data security event, please contact us at (267) 930-1345.

Very truly yours,



Alexandria N. Murphy of  
MULLEN COUGHLIN LLC

ANM/jls  
Enclosure

# **EXHIBIT A**

**ETHOS GROUP, INC.**  
Return Mail Processing  
PO Box 589  
Claysburg, PA 16625-0589

November 2, 2022

i5328-L03-0000003 T00001 P001 \*\*\*\*\*SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L03 ETHOS  
APT ABC  
123 ANY STREET  
ANYTOWN, ST 12345-6789



## Notice of Security Incident

Dear Sample A. Sample:

Ethos Group, Inc. (“Ethos”) writes to inform you of a recent event that may affect the privacy of some of your information. Ethos provides services in connection with automobile dealerships. We are unaware of any identity theft or fraud in connection with this incident. We are providing you notice of the incident, steps we are taking in response, and resources available to help you better protect your information, should you feel it is appropriate to do so.

**What Happened?** On August 1, 2022, we determined some consumer information was accessed between July 30, 2022 and July 31, 2022. We immediately launched an investigation, with the assistance of third-party cybersecurity specialists, to confirm the nature and scope of the activity. This investigation was completed on October 24, 2022 and confirmed that some of your information was present.

**What Information Was Involved?** We confirmed the accessed information includes your [Extra1].

**What We Are Doing.** The security of consumer information is the top priority for Ethos. We responded immediately to this incident and have been working diligently to provide you with accurate and complete notice as soon as possible. As part of our ongoing commitment to the privacy and security of information in our care, we are reviewing our existing policies and procedures.

**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 can find out more about how to better protect against misuse of information in the enclosed *Steps You Can Take To Help Protect Your Personal Information*.

**For More Information.** We understand you may have questions about this incident that are not addressed in this letter. To ensure your questions are answered in a timely manner, please call **(844) 700-0792** toll free Monday through Friday between 8:00 am and 10:00 pm and Saturday and Sunday from 10:00 am to 7:00 pm Central time, excluding US holidays. Please be prepared to provide your engagement number **B079651**.

We apologize for any inconvenience this incident may cause you. We remain committed to the privacy and security of information in our possession.

Sincerely,

Ethos Group, Inc.

B079651

0000003



i5328-L03

## STEPS YOU CAN TAKE TO HELP PROTECT YOUR 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 your free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your 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 you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one 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 your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a credit freeze, you may need to provide 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 you are a victim of identity theft.

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

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/help/">https://www.experian.com/help/</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
1-888-298-0045	1-888-397-3742	1-833-395-6938
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

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; [www.identitytheft.gov](http://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. You can obtain further information on how to file such a complaint

by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your 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; 202-727-3400; and [oag.dc.gov](http://oag.dc.gov).

*For Maryland residents*, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and [www.oag.state.md.us](http://www.oag.state.md.us). You can obtain information from the Maryland Attorney General and the Federal Trade Commission (using the contact information included above) about steps you can take to avoid identity theft. You may also write to us at: 370 W. Las Colinas Blvd., Irving, TX 75039.

*For New Mexico residents*, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your 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 your file is limited; you must give your consent for credit reports to be provided to employers; you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You 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 you to review your rights pursuant to the Fair Credit Reporting Act by visiting [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://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 Ave. N.W., Washington, D.C. 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; or <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](http://www.ncdoj.gov).

*For Rhode Island residents*, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; [www.riag.ri.gov](http://www.riag.ri.gov); and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 109 Rhode Island residents impacted by this incident.

