



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Christopher J. DiIenno
Office: (267) 930-4775
Fax: (267) 930-4771
Email: cdiienzo@mullen.law

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

December 22, 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

Re: Notice of Data Event

Dear Sir or Madam:

We represent Steel River Systems, LLC (“Steel River”) located at 405 W Rock Falls Road, Rock Falls, IL 61071. Steel River is a debt collection servicer. We are writing to notify your office of an incident that may affect the security of certain personal information relating to one thousand three hundred ninety one (1,391) Iowa residents on behalf of Steel River as well as Steel River client AvanteUSA LTD. Steel River provides debt collection services on behalf of AvanteUSA LTD. By providing this notice, Steel River 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 or about July 16, 2022, Steel River became aware of suspicious activity on its computer network. Steel River immediately launched an investigation with the assistance of third-party forensic specialists to assess the security of its systems and determine the full nature and scope of the incident. This investigation determined that data contained on certain Steel River systems was subject to unauthorized access and/or acquisition between May 25, 2022 and July 16, 2022. As a result, Steel River conducted a comprehensive review of all potentially impacted files to determine the full scope of sensitive information involved. Steel River recently completed this comprehensive review and determined that certain information related to residents of Iowa could have been impacted. While we have no evidence of any actual or attempted misuse of information, we are notifying individuals in an abundance of caution.

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The information that could have been subject to unauthorized access includes name, address, Social Security number, driver's license information, financial account information.

Notice to Iowa Residents

On or about December 22, 2022, Steel River provided written notice of this incident to affected individuals. 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, Steel River moved quickly to investigate and respond to the incident, assess the security of Steel River systems, and notify potentially affected individuals. Steel River is also working to implement additional safeguards and training to its employees. Steel River is providing access to credit monitoring services for 1 year, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Steel River is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Steel River 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4842.

Very truly yours,



Christopher J. DiLenno of
MULLEN COUGHLIN LLC

EXHIBIT A



Return Mail Processing
 PO Box 589
 Claysburg, PA 16625-0589

December 22, 2022

i7749-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 AA LETTER VERSION
 APT ABC
 123 ANY STREET
 ANYTOWN, ST 12345-6789



NOTICE OF [Extra1]

Dear Sample A. Sample:

Steel River Systems, LLC (“Steel River”) is writing to inform you of an incident that could affect the security of some of your information. While we are unaware of any actual or attempted misuse of your information, we take this incident very seriously. This notice provides information about the incident, our response, and resources available to you to help protect your information from possible misuse, should you feel it necessary to do so.

What Happened? On or about July 16, 2022, Steel River became aware of suspicious activity on our computer network. We immediately launched an investigation with the assistance of third-party forensic specialists to assess the security of our systems and determine the nature and scope of this incident. This investigation determined that data contained on certain Steel River systems was subject to unauthorized access and/or acquisition between May 25, 2022 and July 16, 2022. As a result, Steel River conducted a comprehensive review of all potentially impacted files to determine the full scope of sensitive information involved. Steel River recently completed this comprehensive review and was able to compile a list of impacted individuals.

What Information Was Involved? Information present in the affected systems that were potentially subject to unauthorized access includes your name and [Extra2]. While we have no reason to believe that any identity theft or unauthorized use of the affected information has occurred, we are making you aware of this incident in an abundance of caution.

What We Are Doing. Data privacy and security are among Steel River’s highest priorities, and there are extensive measures in place to protect information in our care. Upon discovery, Steel River immediately commenced an investigation with the assistance of third-party cyber security specialists to confirm the nature and scope of this incident. Steel River is providing notice of this incident to potentially impacted individuals and pertinent state and/or federal regulators. As part of Steel River’s ongoing commitment to the security of information, all policies and procedures are being reviewed and enhanced where possible, and additional safeguards are being implemented to reduce the likelihood of a similar event in the future.

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. Although we are unaware of any misuse of your information, we have arranged for Experian to provide complimentary credit monitoring and identity protection services to you for [Extra3] months as an added precaution. Please review the instructions contained in the enclosed “Steps You Can Take to Protect Your Information” to enroll. Although these services are being offered to you free of cost, you will need to enroll yourself in the services.

Notice: See following page(s) for important information.

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For More Information. We understand you may have questions about the incident that are not addressed in this letter. If you have questions, please contact our dedicated assistance line at (844) 700-0329, Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays). You may also write to Steel River at 405 W Rock Falls Road, Rock Falls, IL 61071.

Sincerely,
Steel River Systems, LLC

Notice: See following page(s) for important information.

ENGAGE#

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for [Extra3] months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. 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 from the date of the incident (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 Identity Restoration is available to you for [Extra3] months 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.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary [Extra3]-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by March 31, 2023** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (844) 700-0329 by March 31, 2023. Be prepared to provide engagement number ENGAGE# as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR [Extra3]-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 file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

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

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Notice: See following page(s) for important information.

ENGAGE#

0000001



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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 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 security freeze, you will 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, 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
888-298-0045	1-888-397-3742	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; 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.

Notice: See following page(s) for important information.

Steel River Systems, LLC is a debt collector. Some state law requires that we inform you that any information obtained will be used for debt collection purposes. The intent of this communication is to provide you with legally required disclosures and information as stated on previous pages of this communication.

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.

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.

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, 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/>. New York City Department of Consumer Affairs license number: 2044573

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. North Carolina Department of Insurance Permit Number: 113578 and Company Number: 119507254

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; 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 475 Rhode Island residents impacted by this incident.

For Colorado residents, In-State office: 7200 Alton Way, Suite B180, Centennial, Colorado 80112. Toll Free# 720-399-5812.

For Tennessee residents, This collection agency is licensed by the Collection Service Board of the Tennessee Department of Commerce and Insurance.

Original Creditor: **[Extra4]**

Current Creditor: **[Extra5]**

Steel River Systems, LLC.

Toll Free Phone Number: (844) 700-0329

Hours of Operation: Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays)



