

Blair L. Dawson, FIP, CIPP/US, CIPP/E, CIPM
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December 8, 2023

VIA Email (consumer@ag.iowa.gov)

Consumer Protection Division
Security Breach Notifications
Office of the Attorney General of Iowa
1305 E. Walnut Street
Des Moines, Iowa 50319-0106

Re: Central Bank – Incident Notification

To Whom This May Concern:

McDonald Hopkins PLC represents Central Bank (“Central”). I am writing to provide notification of an unauthorized access incident that may affect the security of personal information of approximately six hundred and thirty-four (634) Iowa residents. Central’s investigation is ongoing, and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, Central does not waive any rights or defenses regarding the applicability of Iowa law or personal jurisdiction.

On July 1, 2022, Central Bank detected unauthorized access to a business email account, resulting in potential exposure of the data within the email communications. Upon learning of this issue, Central contained the threat by disabling all unauthorized access to the network and immediately commenced a prompt and thorough investigation. As part of the investigation, Central has been working very closely with external cybersecurity professionals experienced in handling these types of incidents. Following a forensics investigation, Central discovered on September 23, 2023, that certain files that contain personal information were potentially removed from our network by the unauthorized party. Central has confirmed this information impacted included the affected residents’ full names, Social Security numbers, date of birth, driver’s license numbers, financial account information, Passport, tax information, and health insurance information. Not all data elements were impacted for each resident.

Central has no indication that any information has been misused. Nevertheless, out of an abundance of caution, Central wanted to inform you (and affected residents) of the incident and to explain the steps that it is taking to help safeguard the affected residents against identity fraud. Central is providing affected residents with written notification of this incident, commencing on or about December 5, 2023, in substantially the same form as the letter attached hereto. Central is offering the affected residents complimentary one-year membership with a credit monitoring service. Central is also advising the affected residents about the process for placing fraud alerts and/or security freezes on their credit files and obtaining free credit reports. The affected

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residents are also being provided with the contact information for the consumer reporting agencies and the Federal Trade Commission.

At Central, protecting the privacy of personal information is a top priority. Central is committed to maintaining the privacy of personal information in its possession and has taken many precautions to safeguard it. Central continually evaluates and modifies its practices and internal controls to enhance the security and privacy of personal information.

If you have any additional questions, please contact me at (312) 642-6131 or bdawson@mcdonaldhopkins.com.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Blair L. Dawson', with a long horizontal flourish extending to the right.

Blair L. Dawson, FIP, CIPP/US, CIPP/E, CIPM

Encl.