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PENNSYLVANIA	OHIO
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Harrisburg	FLORIDA
King of Prussia	Ft. Lauderdale
Philadelphia	Jacksonville
Pittsburgh	Orlando
Scranton	Tampa
NEW JERSEY	NEW YORK
Cherry Hill	Long Island
Roseland	New York City
DELAWARE	Westchester
Wilmington	

January 30, 2019

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: *Image-I-Nation Technologies, Inc.*
Our File No. 41088.00126

Dear Sir or Madam:

We are writing to notify you of a data security incident involving 9, 211 Iowa residents. We are submitting this notification on behalf of our client, Image-I-Nation Technologies, Inc. ("Image-I-Nation Technologies").

Nature Of The Security Breach

Image-I-Nation Technologies, Inc. is based in Monroe, North Carolina. It provides software and related computer hosting services to consumer reporting agencies. On December 20, 2018, the company became aware that it had become the victim of a cyber intrusion by which an unknown actor was able to obtain unauthorized access to its database containing the personal information of individuals who had a consumer report through its system. As a result, some of the personal information belonging to Iowa residents may have been exposed to others, including their first and last names, dates of birth, home addresses, and social security numbers. Based upon its investigation, Image-I-Nation Technologies has determined that the incident began on or about November 1, 2018 and that its systems were secure as of November 15, 2018. The company is not aware of any misuse of personal information arising out of this incident.

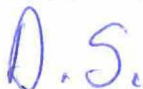
We anticipate that the residents involved in this incident will be forwarded letters notifying them of this incident on February 6, 2019. A copy of the form letter is attached hereto.

Steps Taken Relating To The Incident

Upon learning of this incident, Image-I-Nation Technologies immediately conducted an investigation to determine how this incident occurred and who was impacted. The company retained a forensic IT firm to conduct an analysis and remediation of its system. It has also reviewed its internal data management protocols and has implemented enhanced security measures to help prevent this type of incident from recurring in the future. Image-I-Nation Technologies is also notifying the three major credit bureaus, Experian, Equifax and TransUnion, to advise them that personal information may have been improperly accessed and that they should take appropriate action.

Should you need additional information regarding this matter, please contact me.

Very truly yours,

A handwritten signature in blue ink, appearing to read "D. Shannon".

DAVID J. SHANNON

DJS:jl
Encl.

Image-I-Nation Technologies, Inc.

Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

NOTICE OF DATA BREACH

Dear <<Name 1>>:

Image-I-Nation Technologies, Inc. provides software and related computer hosting services to consumer reporting agencies. We take the privacy and protection of the personal information provided to us very seriously. We are writing to inform you of a recent data security incident at Image-I-Nation Technologies that may have involved some of your personal information. Please review the information provided in this letter for some steps that you may take to protect yourself against any potential misuse of your information.

What Happened

On December 20, 2018, Image-I-Nation Technologies discovered that there had been unauthorized access to our database containing the personal information of individuals who had a consumer report through our system at some point in the past. Based upon our investigation, we have determined that the incident began on or about November 1, 2018 and that our systems were secure as of November 15, 2018. While we are not aware of any misuse of your personal information, we have determined that your personal information was hosted within our database during the time of the incident.

What Information Was Involved

Based on our investigation, we have determined that the personal information that was potentially accessed could have included first and last names, dates of birth, home addresses, and social security numbers.

What We Are Doing

Upon discovering this incident, we immediately conducted an investigation to determine how this incident occurred and who was impacted. We have retained a forensic IT firm to conduct an analysis and remediation of our system. We have also reviewed our internal data management and protocols and have implemented enhanced security measures to help prevent this type of incident from recurring. We are also notifying the three major credit bureaus, Experian, Equifax and TransUnion, to advise them that your personal information may have been improperly accessed and that they should take appropriate action.

What You Can Do

We recommend that you review the enclosed "Information About Identity Theft Prevention" reference guide, which describes additional steps that you may take to help protect yourself, including recommendations by the Federal Trade Commission.

For More Information

We sincerely apologize for this incident and regret any inconvenience it may cause you. Should you have questions or concerns regarding this matter, please contact our call center dedicated to this incident at 877-296-9970 between 9:00 a.m. and 9:00 p.m. Eastern Time, Monday through Friday.

Sincerely,

A handwritten signature in black ink, appearing to read "Phil Chapman", with a long horizontal flourish extending to the right.

Phil Chapman
President
Image-I-Nation Technologies, Inc.

Information About Identity Theft Prevention

We recommend that you regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report once every 12 months from each of the three nationwide credit reporting agencies. To order your annual free credit report, please visit www.annualcreditreport.com, or call toll-free 1-877-322-8228. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

Equifax: P.O. Box 740241, Atlanta, Georgia 30374-0241, 1-800-685-1111, www.equifax.com
Experian: P.O. Box 2002, Allen, TX 75013, 1-888-397-3742, www.experian.com
TransUnion: P.O. Box 2000, Chester, PA 19016, 1-800-888-4213, www.transunion.com

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

If you are a resident of Maryland, Massachusetts, or North Carolina, you may contact and obtain information from your state attorney general at:

Maryland Attorney General's Office, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us, 1-888-743-0023 or 1-410-576-6300

Office of the Massachusetts Attorney General, One Ashburton Place, Boston, MA 02108, www.mass.gov/ago/contact-us.html, 1-617-727-840

North Carolina Attorney General's Office, 9001 Mail Service Center, Raleigh, NC 27699, www.ncdoj.gov, 1-919-716-6400 or 1-877-566-7226

If you are a resident of Massachusetts, note that pursuant to Massachusetts law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze.

If you are a resident of West Virginia, you have the right to ask that nationwide consumer reporting agencies place "fraud alerts" in your file to let potential creditors and others know that you may be a victim of identity theft, as described below. You also have a right to place a security freeze on your credit report, as described below.

Fraud Alerts: There are two types of fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies.

Credit Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A security freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a security freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a security freeze may delay your ability to obtain credit.

There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

Experian Security Freeze, PO Box 9554, Allen, TX 75013, www.experian.com

TransUnion Security Freeze, PO Box 2000, Chester, PA 19016, www.transunion.com

Equifax Security Freeze, PO Box 105788, Atlanta, GA 30348, www.equifax.com

To request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.)
2. Social Security number
3. Date of birth
4. If you have moved in the past five years, provide the addresses where you have lived over the prior 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, military identification, etc.)
7. If you are a victim of identity theft, include a copy of the police report, investigative report, or complaint to a law enforcement agency concerning identity theft

The credit reporting agencies have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five business days and provide you with a unique personal identification number ("PIN") or password or both that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, or to lift a security freeze for a specified period of time, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to the credit reporting agencies and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze as well as the identity of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to each of the three credit bureaus and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to remove the security freeze.

Fair Credit Reporting Act: You also have rights under the federal Fair Credit Reporting Act, which promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. The FTC has published a list of the primary rights created by the FCRA (<https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>), and that article refers individuals seeking more information to visit www.ftc.gov/credit. The FTC's list of FCRA rights includes:

- You have the right to receive a copy of your credit report. The copy of your report must contain all the information in your file at the time of your request.
- Each of the nationwide credit reporting companies – Equifax, Experian, and TransUnion – is required to provide you with a free copy of your credit report, at your request, once every 12 months.
- You are also entitled to a free report if a company takes adverse action against you, like denying your application for credit, insurance, or employment, and you ask for your report within 60 days of receiving notice of the action. The notice will give you the name, address, and phone number of the credit reporting company. You are also entitled to one free report a year if you're unemployed and plan to look for a job within 60 days; if you are on welfare; or if your report is inaccurate because of fraud, including identity theft.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- Consumer reporting agencies 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 reports to be provided to employers.
- You may limit "prescreened" offers of credit and insurance you receive based on information in your credit report.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.