



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Kevin Dolan
Office: (267) 930-4861
Fax: (267) 930-4771
Email: kdolan@mullen.law

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

March 29, 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 Perficut Companies, Inc. (“Perficut”) located at 6550 NE 14th Street Des Moines, IA 50313, and are writing to notify your office of an incident that may affect the security of certain personal information relating to eight hundred fourteen (814) Iowa residents. By providing this notice, Perficut 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 September 15, 2021, Perficut became aware of suspicious activity in certain employee email accounts. Perficut immediately launched an investigation with the assistance of third-party specialists to determine the nature and scope of the incident. The investigation determined an unauthorized individual accessed certain Perficut email accounts between June 29, 2021 and September 8, 2021. However, Perficut was unable to determine which emails and attachments in the email accounts were actually subject to unauthorized access. Therefore, in an abundance of caution, Perficut engaged in a comprehensive review of the full contents of the affected accounts to determine what, if any, sensitive information was contained within them. On February 25, 2022, this time intensive review was completed and we confirmed that the accounts contained sensitive information relating to Iowa residents.

The information that could have been subject to unauthorized access includes name, Social Security number, Driver’s License number, account number, routing number, and payment card number.

Notice to Iowa Residents

On March 29, 2022, Perficut provided written notice of this incident to eight hundred fourteen (814) 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

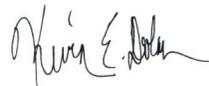
Upon discovering the event, Perficut moved quickly to investigate and respond to the incident, assess the security of Perficut systems, and identify potentially affected individuals. Perficut is also working to implement additional safeguards and training to its employees. Perficut is providing access to credit monitoring services for 12 months, through Kroll, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Perficut 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. Perficut 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) 930-4861.

Very truly yours,



Kevin Dolan of
MULLEN COUGHLIN LLC

KED/ama
Enclosure

EXHIBIT A



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

NOTICE OF <<b2b_text_1 (Header Text)>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>

Perficut Companies, Inc. (“Perficut”) is writing to notify you of an incident that may affect the privacy of some of your information. We take the protection of your information very seriously, and this letter provides details regarding the incident, our response, and resources available to help protect your personal information from possible misuse, should you feel it is appropriate to do so.

What Happened?

On or about September 15, 2021, Perficut became aware of suspicious activity in certain employee email accounts. We immediately launched an investigation with the assistance of third-party specialists to determine the nature and scope of the incident. The investigation determined an unauthorized individual accessed certain Perficut email accounts between June 29, 2021 and September 8, 2021. However, we were unable to determine which emails and attachments in the email accounts were actually subject to unauthorized access. Therefore, in an abundance of caution, we engaged in a comprehensive review of the full contents of the affected accounts to determine what, if any, sensitive information was contained within them. On February 25, 2022, this time intensive review was completed, and we confirmed that the accounts contained certain information related to you.

What Information Was Involved?

The information relating to you that may have been affected by this event includes your <<b2b_text_2 (“name” and Impacted Data)>>.

What We Are Doing.

Following this incident, we took immediate steps to secure the impacted accounts, implemented multifactor authentication for all users, and conducted a thorough investigation. As an added precaution, we are also offering you complimentary access to 12 months of credit and identity monitoring services through Kroll. Information and instructions on how to activate these complimentary services can be found in the “Steps You Can Take to Help Protect Your Information” attached to this letter.

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 over the next 12 to 24 months. Additional information and resources are included in the enclosed “Steps You Can Take To Protect Personal Information.” You may also enroll in the complimentary identity monitoring services we are making available to you. Enrollment instructions are attached to this letter.

For More Information.

If you have additional questions, please contact our dedicated assistance line at [1-??-??-??], Monday through Friday, 8:00 a.m. to 5:30 p.m., Central Time (except U.S. holidays).

Sincerely,

A handwritten signature in black ink that reads "Matt Boelman".

Matt Boelman

President

Perficut Companies, Inc.

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit and Identity Monitoring and Restoration

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide credit and identity monitoring and restoration at no cost to you for 12 months. Kroll is a global leader in risk mitigation and response, and its team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration. If you are currently enrolled in Identity Monitoring and Restoration through Kroll, please contact the call center at [\[CALL CENTER NUMBER\]](#) to take advantage of this offer, rather than signing up online as described below.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6 (Activation Date)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s_n>>

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

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
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; 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.

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. Perficut is located at 6550 NE 14th Street, Des Moines, Iowa 50313.

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/>.

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; 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 \[#\] Rhode Island residents impacted by this incident.](#)