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

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

April 26, 2024

VIA E-MAIL

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

Re: Notice of Data Event

To Whom It May Concern:

We represent Financial Business and Consumer Solutions, Inc. ("FBCS") located at 330 South Warminster Road, Suite 353, Hatboro, Pennsylvania 19040, and are writing to notify your office on behalf of certain FBCS clients of an incident that may affect the security of certain personal information relating to fourteen thousand eight hundred eight (14,808) Iowa residents. The list of certain FBCS clients for which this notification applies can be made available upon request. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, neither FBCS, nor its clients, 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

FBCS is a third-party debt collection agency and receives personal information from its clients, which is used to collect debts on behalf of its clients.

On February 26, 2024, FBCS discovered unauthorized access to certain systems in its network. This incident did not impact computer systems outside of FBCS's network, including those of its clients. FBCS immediately took steps to secure the impacted environment and launched an investigation with the assistance of third-party computer forensics specialists to determine the full nature and scope of the incident. The investigation determined that the environment was subject to unauthorized access between February 14 and February 26, 2024, and the unauthorized actor

had the ability to view or acquire certain information on the FBCS network during the period of access. FBCS undertook a comprehensive review of the data at risk to determine if any sensitive information could be affected and to whom it related. FBCS learned that certain information provided by customer organizations related to individuals may have been accessed or exfiltrated during the incident. FBCS has seen no evidence of misuse of any information related to this incident.

Starting on April 4, 2024, FBCS began providing notice of this incident to potentially impacted clients, and as the investigation and review of the data continued, reported to its clients what specific data of theirs was impacted. FBCS then offered to provide notice on behalf of its clients to potentially impacted individuals as required.

The information that could have been subject to unauthorized access includes name, Social Security number, date of birth, and account information.

Notice to Iowa Residents

Beginning on April 26, 2024, FBCS began providing written notice of this incident to individuals, which includes fourteen thousand eight hundred eight (14,808) 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, FBCS moved quickly to investigate and respond to the incident, assess the security of FBCS systems, and identify potentially affected individuals. Further, FBCS notified federal law enforcement regarding the event. FBCS is also working to implement additional safeguards in a newly built environment. FBCS is providing access to credit monitoring services for one (1) year, through Cyex, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, FBCS 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. FBCS 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.

FBCS is providing 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) 930-4775.

Very truly yours,

Christopher J. DiIenno of
MULLEN COUGHLIN LLC

CJD/lcf
Enclosure

EXHIBIT A

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

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

<<Date>>

Notice of Data << Event/Breach>>

Dear <<Name 1>>:

Financial Business and Consumer Solutions, Inc. ("FBCS") is writing to notify you of an incident that may affect the privacy of some of your information. FBCS is a debt collection agency, and this letter provides details of the incident and the resources available to you to help protect your information should you feel it is appropriate to do so.

What Happened? On February 26, 2024, FBCS discovered unauthorized access to certain systems in its network. This incident did not impact computer systems outside of FBCS's network. We immediately took steps to secure the impacted environment and launched an investigation with the assistance of third-party computer forensics specialists to determine the full nature and scope of the incident. The investigation determined that the environment was subject to unauthorized access between February 14 and February 26, 2024, and the unauthorized actor had the ability to view or acquire certain information on the FBCS network during the period of access. Therefore, FBCS undertook a comprehensive review of the data at risk to assess if any sensitive information could be affected and to whom it related. We are notifying you because certain information related to you may have been accessed or exfiltrated during the incident. This notification was not delayed as a result of a law enforcement investigation.

What Information Was Involved? The types of information potentially affected by this incident include your: <<Data Elements>>. FBCS has no indication that your information has been misused in relation to this event.

What We Are Doing. Upon discovering this incident, we immediately took steps to conduct a diligent investigation to confirm the nature and scope of the incident. As part of FBCS's ongoing commitment to the security of information on our platform, we also implemented additional safeguards in a newly built environment.

As an added precaution, we are offering you access to complimentary credit monitoring and identity restoration services for <<12/24>> months through CyEx. Please review the attached *Steps You Can Take to Help Protect Your Personal Information* for instructions regarding how to enroll and for additional information regarding these services. Please note you will need to enroll yourself in these services if you wish to do so, as we are not able to activate the services on your behalf.

What You Can Do. You can review the enclosed *Steps You Can Take to Help Protect Your Personal Information*. In addition, we encourage you to remain vigilant against incidents of identity theft and fraud, to monitor your account statements to detect errors, and to review your credit reports for suspicious activity. We also encourage you to enroll in the complimentary credit monitoring services we are offering you.

For More Information. We understand you may have questions about the incident that are not addressed in this letter. If you have questions, please call 888-984-6614 between 9:00 AM and 9:00 PM ET Monday through Friday excluding major U.S. holidays. Additionally, you can write to us at 330 S. Warminster Road, Suite 353, Hatboro, PA 19040.

Sincerely,

Amy Stratz
Executive Vice President
Financial Business and Consumer Solutions, Inc.

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

Enroll in Credit Monitoring

Identity Defense

<<Name 1>>
Enter your Activation Code: <<Activation Code>>
Enrollment Deadline: <<Enrollment Deadline>>
Service Term: <<12/24>> Months*

Identity Defense Complete

Key Features

- 1-Bureau Credit Monitoring
- Monthly Credit Score and Tracker (VantageScore 3.0)
- Real-Time Authentication Alerts
- High-Risk Transaction Monitoring
- Address Change Monitoring
- Dark Web Monitoring
- Wallet Protection
- Security Freeze Assist
- $1 Million Identity Theft Insurance**

Enrollment Instructions

To enroll in Identity Defense, visit **app.identitydefense.com/enrollment/activate/fbcs**

1. **Enter your unique Activation Code <<Activation Code>>**
   Enter your Activation Code and click 'Redeem Code'.

2. **Create Your Account**
   Enter your email address, create your password, and click 'Create Account'.

3. **Register**
   Enter your legal name, home address, phone number, date of birth, Social Security Number, and click 'Complete Account'.

4. **Complete Activation**
   Click 'Continue to Dashboard' to finish enrolling.

The deadline to enroll is <<Enrollment Deadline>>. After <<Enrollment Deadline>>, the enrollment process will close, and your Identity Defense code will no longer be active. **If you do not enroll by <<Enrollment Deadline>>, you will not be able to take advantage of Identity Defense, so please enroll before the deadline.**

If you need assistance with the enrollment process or have questions regarding Identity Defense, please call Identity Defense directly at 1.866.622.9303.

*Service Term begins on the date of enrollment, provided that the enrollment takes place during the approved enrollment period.
**Identity Theft Insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions, and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

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 may need to provide the following information, depending on whether you make the request online, by phone, or by mail:

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.);
7. Social Security Card, pay stub, or W2;
8. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning 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	1-800-916-8800
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, your state Attorney General, and the Federal Trade Commission. 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, D.C. 20001; 202-727-3400; and https://oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and https://www.marylandattorneygeneral.gov/.

For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their 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 consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their rights pursuant to the Fair Credit Reporting Act by visiting https://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 https://www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; https://www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, individuals have the right to file or obtain any police report filed in regard to this event. There is/are approximately <<RI Count>> Rhode Island residents that may be impacted by this event.

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

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

<<Date>>

Notice of Data << Event/Breach>>

Dear <<Name 1>>:

Financial Business and Consumer Solutions, Inc. ("FBCS") is a debt collection agency, providing services to <<Data Owner>>. FBCS is writing on behalf of <<Data Owner>> to notify you of an incident that affects the privacy of some of your information. This letter provides details of the incident and the resources available to you to help protect your information should you feel it is appropriate to do so.

What Happened? On February 26, 2024, FBCS discovered unauthorized access to certain systems in its network. This incident did not impact computer systems outside of FBCS's network, including any systems belonging to <<Data Owner>>. We immediately took steps to secure the impacted environment and launched an investigation with the assistance of third-party computer forensics specialists to determine the full nature and scope of the incident. The investigation determined that the environment was subject to unauthorized access between February 14 and February 26, 2024, and the unauthorized actor had the ability to view or acquire certain information on the FBCS network during the period of access. Therefore, FBCS undertook a comprehensive review of the data at risk to assess if any sensitive information could be affected and to whom it related. We are notifying you because certain information related to you may have been accessed or exfiltrated during the incident. This notification was not delayed as a result of a law enforcement investigation.

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What We Are Doing. Upon discovering this incident, we immediately took steps to conduct a diligent investigation to confirm the nature and scope of the incident. As part of FBCS's ongoing commitment to the security of information on our platform, we also implemented additional safeguards in a newly built environment. As an added precaution, we are offering you access to complimentary credit monitoring and identity restoration services for <<12/24>> months through CyEx. Please review the attached *Steps You Can Take to Help Protect Your Personal Information* for instructions regarding how to enroll and for additional information regarding these services. Please note you will need to enroll yourself in these services if you wish to do so, as we are not able to activate the services on your behalf.

What You Can Do. You can review the enclosed *Steps You Can Take to Help Protect Your Personal Information*. In addition, we encourage you to remain vigilant against incidents of identity theft and fraud, to monitor your account statements to detect errors, and to review your credit reports for suspicious activity. We also encourage you to enroll in the complimentary credit monitoring services we are offering you.

For More Information. We understand you may have questions about the incident that are not addressed in this letter. If you have questions, please call 888-984-6614 between 9:00 AM and 9:00 PM ET Monday through Friday excluding major U.S. holidays. Additionally, you can write to us at 330 S. Warminster Road, Suite 353, Hatboro, PA 19040.

Sincerely,

Amy Stratz
Executive Vice President
Financial Business and Consumer Solutions, Inc.

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

Enroll in Credit Monitoring

Identity Defense

<<Name 1>>
Enter your Activation Code: <<Activation Code>>
Enrollment Deadline: <<Enrollment Deadline>>
Service Term: <<12/24>> Months*

Identity Defense Complete

Key Features

- 1-Bureau Credit Monitoring
- Monthly Credit Score and Tracker (VantageScore 3.0)
- Real-Time Authentication Alerts
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- Address Change Monitoring
- Dark Web Monitoring
- Wallet Protection
- Security Freeze Assist
- $1 Million Identity Theft Insurance**

Enrollment Instructions

To enroll in Identity Defense, visit **app.identitydefense.com/enrollment/activate/fbcs**

1. **Enter your unique Activation Code <<Activation Code>>**
   Enter your Activation Code and click 'Redeem Code'.

2. **Create Your Account**
   Enter your email address, create your password, and click 'Create Account'.

3. **Register**
   Enter your legal name, home address, phone number, date of birth, Social Security Number, and click 'Complete Account'.

4. **Complete Activation**
   Click 'Continue to Dashboard' to finish enrolling.

The deadline to enroll is <<Enrollment Deadline>>. After <<Enrollment Deadline>>, the enrollment process will close, and your Identity Defense code will no longer be active. **If you do not enroll by <<Enrollment Deadline>>, you will not be able to take advantage of Identity Defense, so please enroll before the deadline.**

If you need assistance with the enrollment process or have questions regarding Identity Defense, please call Identity Defense directly at 1.866.622.9303.

*Service Term begins on the date of enrollment, provided that the enrollment takes place during the approved enrollment period.
**Identity Theft Insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions, and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

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.

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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 may need to provide the following information, depending on whether you make the request online, by phone, or by mail:

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.);
7. Social Security Card, pay stub, or W2;
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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	1-800-916-8800
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

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For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and https://www.marylandattorneygeneral.gov/.

For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their 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 consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their rights pursuant to the Fair Credit Reporting Act by visiting https://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 https://www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; https://www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, individuals have the right to file or obtain any police report filed in regard to this event. There is/are approximately <<RI Count>> Rhode Island residents that may be impacted by this event.