



MULLEN  
COUGHLIN<sup>LLC</sup>  
ATTORNEYS AT LAW

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July 11, 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](mailto:consumer@ag.iowa.gov)

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent Afni, Inc. (“Afni”), located at 1310 Martin Luther King Jr. Drive, Bloomington, IL 61554, and are writing to notify your office of an event that may affect the security of certain personal information relating to approximately nine hundred sixty-five (965) Iowa residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Afni 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 June 7, 2021, Afni discovered anomalous activity within its computer network. Afni immediately launched an investigation, with the assistance of third-party cybersecurity specialists, to determine the nature and scope of the event. The investigation determined that on or before June 7, 2021, an unauthorized actor gained access to certain Afni systems and that the unauthorized actor may have viewed or taken data from within those systems.

Afni conducted a thorough and in-depth review of the information accessible within the systems to identify individuals with information potentially at risk. On June 2, 2022, Afni finalized this review to confirm the nature and scope of impacted data and the individuals to whom that data related. The personal information impacted by this event includes the following: name, address, Social Security number, driver’s license number, and financial account information.

### **Notice to Iowa Residents**

On or about July 11, 2022, Afni began providing written notice of this event to affected individuals, which includes approximately nine hundred sixty-five (965) 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, Afni moved quickly to investigate and respond to the event, assess the security of Afni systems, and identify potentially affected individuals. Afni also notified federal law enforcement regarding the event and is working to implement additional safeguards and training to its employees.

Additionally, Afni 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. Afni 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.

Afni is providing written notice of this event to relevant state regulators, as required, 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) 930-2303.

Very truly yours,

A handwritten signature in blue ink that reads "Lynda Jensen". The signature is written in a cursive style.

Lynda Jensen of  
MULLEN COUGHLIN LLC

# **EXHIBIT A**

DEPT 555  
PO BOX 4115  
CONCORD CA 94524



RETURN SERVICE REQUESTED



Office Address:

PO Box 3517  
Attention: SDP  
Bloomington, IL 61702  
Monday - Friday 8:00am - 5:00pm Central



<DNA>  
<LT\_Addr1>  
<LT\_Addr2>  
<LT\_City> ST <LT\_Zip>

NOTICE DATE: June 14, 2022

Ref. No. <V04>

## NOTICE OF SECURITY INCIDENT

Dear <DNA>,

Afni, Inc. ("Afni") is writing to inform you of an event that may impact the security of some of your information. Although we have received no indication of any actual or attempted identity theft or fraud of your personal information as a result of this event, this notice provides information about the event, our response, and resources available to you to help protect your information from possible misuse, should you feel it is necessary to do so.

**What Happened?** On June 7, 2021, Afni discovered anomalous activity within its computer network. Afni immediately launched an investigation, with the assistance of third-party cybersecurity specialists, to determine the nature and scope of the event. The investigation determined that on or before June 7, 2021, an unauthorized actor gained access to certain Afni systems and that the unauthorized actor may have viewed or taken data from within those systems. Therefore, we conducted a thorough and in-depth review of the information within those systems to identify individuals with personal information that was potentially accessible. On June 3rd, 2022, Afni finalized this review to confirm the nature and scope of impacted data and the individuals to whom that data related. Although we are unaware of any actual or attempted identity theft or fraud of your personal information, we are providing you this notice out of an abundance of caution.

**What Information Was Involved?** The investigation determined that your name, address, social security number, and date of birth may have been accessible.

**What We Are Doing?** The confidentiality, privacy, and security of information in our care are among our highest priorities. Upon learning of the event, we investigated and responded to the event, assessed the security of our systems, and notified potentially affected individuals. We are notifying potentially affected individuals, including you, so that you may take further steps to best protect your information, should you feel it is necessary to do so. We regret any inconvenience or concern this event may cause.

**What You Can Do?** We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statement and credit reports for suspicious activity and to report any suspicious activity promptly to your bank or financial institution. Additional information and resources are included in the enclosed Steps You Can Take To Protect Personal Information.

**For More Information.** We understand that you may have questions about this event that are not addressed in this letter. If you have additional questions, please call the dedicated assistance line at 1-833-840-0917, Monday through Friday from 8:00 am through 5:00 pm Central Time, excluding major U.S. holidays. Again, we take the privacy and security of information in our care very seriously and sincerely regret any inconvenience or concern this event may cause you.

Sincerely,

*Brent Deterding*  
Chief Info Security Officer

## STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

### **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](http://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 one-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 credit 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 fraud alert or a credit freeze, please contact the three major credit reporting bureaus listed below:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/help/">https://www.experian.com/help/</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
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](http://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.