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July 30, 2024

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, IA 50319-0106

Re: Incident Notification

Dear Sir or Madam:

We are writing on behalf of our client, Gunster, Yoakley & Stewart, PA ("Gunster"), to notify your office of a data security incident involving Iowa residents. Gunster is located at 777 South Flagler Drive, Suite 500, West Palm Beach, FL 33401.

Gunster has been working continuously and diligently to complete notification to individuals whose information was involved in a security incident that Gunster detected on November 27, 2022. Gunster began providing notice to individuals in April 2023 and provided substitute notice in August 2023 via nationwide media and a post on Gunster's website. Gunster continued working through files and with its clients to provide incremental notice to individuals in approximately 40 different rounds of mailings.

With regard to the underlying incident, Gunster immediately took measures to contain the incident and securely restore its network. A thorough investigation was conducted with the assistance of firms that have helped other law firms address similar incidents. Gunster determined from the investigation that there was unauthorized access to its document management file system over the weeks leading up to the discovery of the incident. After Gunster identified the files involved, they began a process to review those files to identify the content. Gunster also notified federal law enforcement and has been in communication with them regarding the incident.

Based on that review, as noted above, Gunster began mailing notifications to individuals in April 2023 and, on August 4, 2023, provided substitute notice. The file review continued, and, on

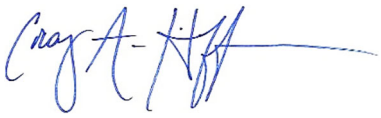
October 15, 2023, the review process generated a preliminary list of individuals whose information was contained in the files. Gunster then worked to review the list and supplement it with addresses and other information to be able to identify individuals to notify. The review confirmed that the files contained information related to Iowa residents, including the individuals' name and one or more of the following data elements: Social Security number, driver's license number, passport or other government identification number, financial account number, and/or payment card number.

Gunster conducted an additional mailing on December 1 and 4, 2023, including 241 Iowa residents, which was below the threshold to notify your office. Gunster's review continued and notification letters were mailed on a rolling basis as individuals were identified and addresses were confirmed. The data review and notification process is now complete. Approximately 1,178 Iowa residents were notified, and Gunster is now notifying your office.

Gunster is offering the residents a complimentary membership to credit monitoring and identity protection services through Kroll. Gunster also has established a dedicated, toll-free call center to answer questions the individuals may have.

To help prevent this type of incident from happening again, Gunster has implemented additional measures to further strengthen the security of its network.

Sincerely,



Craig A. Hoffman
Partner

Enclosure

GUNSTER
FLORIDA'S LAW FIRM FOR BUSINESS

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

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

<<b2b_text_1(Notice of Data Breach - CA residents)>>

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

Gunster, Yoakley, & Stewart, PA ("Gunster") is a law firm that obtained your information in connection with the provision of legal services. You may not have heard of Gunster, but we provide professional legal services to clients in a wide variety of industries and business sectors. In order to serve our clients, we receive relevant data from our clients, opposing parties and third parties. We are writing to notify you of a data security incident that occurred at Gunster and involved some of your information. This notice explains the incident, measures taken to protect the information, and some steps you may consider taking in response. We regret that this incident occurred and apologize for any inconvenience.

What Happened?

Upon detecting the data security incident on November 27, 2022, we immediately took measures to contain the incident and securely restore our network. A thorough investigation was conducted with the assistance of firms that have helped other law firms address similar incidents. We determined from the investigation that there was unauthorized access to our document management file system over the weeks leading up to our discovery of the incident. After we identified the files involved, we began a process to review those files to identify the content. We also notified federal law enforcement and have been in communication with them regarding the incident.

What Information Was Involved?

We began reviewing the files involved, and based on that review, began providing notifications to individuals in April 2023. Our review continued and, on October 15, 2023, the review process generated a preliminary list of individuals whose information was contained in the files. We then worked to review the list and supplement it with addresses and other information to be able to identify individuals to notify. Our review confirmed that the files contained your <<b2b_text_2(data elements)>>.

What We Are Doing.

Gunster has implemented additional measures to further strengthen the security of its network. We have secured the services of Kroll to provide identity monitoring at no cost to you for 12 months. Your identity monitoring services include Credit Monitoring, Web Watcher, Public Persona, Quick Cash Scan, $1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration. For more information on how to help safeguard your identity and Kroll Identity Monitoring, including instructions on how to activate your complimentary membership, please visit the below website and see the additional information provided with this letter.

Visit **https://enroll.krollmonitoring.com** to activate and take advantage of your identity monitoring services.
You have until <<b2b_text_6(activation deadline)>> to activate your identity monitoring services.
Membership Number: **<<Membership Number s_n>>**

What You Can Do.

For more information on your complimentary identity monitoring services, as well as additional steps you can take in response to this incident, please see the pages that follow this letter.

For More Information.

If you have any questions, please call 1-866-869-0385, Monday through Friday, between 9:00 am and 6:30 pm, Eastern Time, excluding some U.S. holidays.

Sincerely,

Gunster

KROLL

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

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.

Web Watcher

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

Public Persona

Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you will receive an alert.

Quick Cash Scan

Quick Cash Scan monitors short-term and cash-advance loan sources. You will receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.

$1 Million Identity Fraud Loss Reimbursement

Reimburses you for out-of-pocket expenses totaling up to $1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

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.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity over the next 12 to 24 months and to report actual or suspected identity theft incidents to your financial institution. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-888-378-4329
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

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.identitytheft.gov

Fraud Alerts and Security Freezes

Fraud Alerts: There are two types of general 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.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? 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:

- *Equifax Security Freeze*, PO Box 105788, Atlanta, GA 30348, www.equifax.com
- *Experian Security Freeze*, PO Box 9554, Allen, TX 75013, www.experian.com
- *TransUnion Security Freeze*, PO Box 160, Woodlyn, PA 19094, www.transunion.com

You'll need to supply your name, address, date of birth, Social Security number and other personal information.

After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

Gunster is located at 777 South Flagler Drive, Suite 500 East, West Palm Beach, FL 33401-6194 and can be reached by phone at 800-749-1980.

Additional information for residents of the following states:

Connecticut: You may contact and obtain information from your state attorney general at: *Connecticut Attorney General's Office*, 165 Capitol Ave, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag

District of Columbia: You may contact and obtain information from your attorney general at: Office of the Attorney General for the District of Columbia, 400 6th Street NW, Washington, DC 20001, 1-202-727-3400, www.oag.dc.gov

Maryland: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, https://www.marylandattorneygeneral.gov/

New York: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection,* One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, http://www.dos.ny.gov/consumerprotection; and *New York State Office of the Attorney General,* The Capitol, Albany, NY 12224-0341, 1-800-771-7755, https://ag.ny.gov

North Carolina: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov

Rhode Island: This incident involves XX individuals in Rhode Island. Under Rhode Island 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, as described above. You may contact and obtain information from your state attorney general at: *Rhode Island Attorney General's Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov

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 above. You also have a right to place a security freeze on your credit report, as described above.

A Summary of Your Rights Under the Fair Credit Reporting Act: The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street NW, Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- 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 get based on information in your credit report.
- You have a right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.