

# Holland & Knight

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August 18, 2023

*Via Email – [consumer@ag.iowa.gov](mailto: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: Data Security Incident Notification

Dear Attorney General Bird:

I write on behalf of McKenzie Check Advance of Iowa, L.L.C. doing business as Advance America ("Advance America") to inform you of a data security incident that affects Iowa residents. On or around February 7, 2023, Advance America experienced a systems outage. In response to this incident, Advance America immediately launched an investigation, engaged leading cybersecurity experts, and notified law enforcement. After containing, and eliminating the unauthorized actor's access to its systems, Advance America implemented additional security measures to further fortify its network's security measures and protocols.

Advance America performed a full audit of data compromised in this incident, so to determine whether the data contained any personal information of Iowa residents. We received the initial results of this review in late June and received the final, confirmed results on July 26, 2023. Based on these results, an unauthorized actor may have accessed and/or acquired the personal information of 31070 Iowa residents. This personal information includes name, social security number, driver's license number, and passport number.

Advance America has taken steps to further strengthen and harden the security of systems in its network, including enhancing administrative and technical safeguards. These administrative and technical safeguards include but are not limited to the following: expanding the use of multi-factor authentication, more frequent and rigorous training of employees on avoiding phishing attempts, additional filtering of malicious links and impersonation protection policies, and enhancing network monitoring.

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On August 15, 2023, we mailed the notification letters to the affected Iowa residents. Advance America has established a dedicated call center service to assist affected residents with questions and is offering complimentary access to 12 months of identity theft protection services through Kroll Essential Monitoring Services. We've enclosed a sample notice provided to the Iowa residents.

Sincerely yours,

HOLLAND & KNIGHT LLP

A handwritten signature in blue ink that reads "Elizabeth K. Hinson". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Elizabeth K. ("Bess") Hinson

BH

Enclosure

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

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country>>

**RE: Notice of Data Breach**

Dear <<first\_name>> <<last\_name>>:

<<b2b\_text\_2 (Entity Name)>> d/b/a Advance America (“the Company” or “we”) is writing to inform you of a data security incident that may have impacted some of your personal information. We collected personal information about you when you applied to receive a loan or another financial service from us and/or became an active customer. We want to provide you with details about the incident, our response, and resources available to you to help protect your information from possible misuse, should you feel it is appropriate to do so.

**What Happened**

On or around February 7, 2023, we experienced a temporary systems outage affecting our corporate network. Upon becoming aware of the incident, we immediately launched an investigation to better understand the scope and impact of the incident. We also engaged third-party cybersecurity experts to remediate, further investigate what happened, and determine the scope of the incident. Our investigation determined that an unauthorized actor accessed or acquired certain corporate business records on the Company’s network. We also reported this incident to law enforcement.

**What We Discovered**

We conducted a thorough review of these business records to identify the individuals whose information was contained in the records. We recently completed this review and determined that some of your information was included in the records.

**What Information Was Involved**

The impacted personal information relating to you includes your <<b2b\_text\_1(DataElements)>>.

**Additional Actions**

***Secured Our Systems***

In response to this incident, the Company implemented additional security measures to further fortify its network’s security measures and protocols and protect customers’ information, including leading industry security tools and improved monitoring, enhancing administrative and technical safeguards, and instituting more frequent and rigorous security training. We have no evidence that there is any ongoing threat to our system or network.

***Offering Protection***

To assist you in monitoring your identity, we have secured the services of Kroll to provide identity monitoring and protection services at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

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>>

Additional information describing your services is included with this letter.

**What You Can Do**

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. We recommend you review the information contained in the enclosed "Additional Resources" section of this letter. This section describes additional steps you can take to help protect your identity, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file.

**For More Information**

Protecting your information is important to us. Please be assured that we are committed to helping you protect your personal information and identity and ensuring that your information is safe and secure. We regret this incident and apologize for any concern it may cause you.

If you have further questions regarding this matter, please do not hesitate to call (866) 674-3367 Monday through Friday, from 8:00 am to 5:30 pm Central Time, excluding some U.S. holidays.

Sincerely,

The Customer Support Team



## 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.

### **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 RESOURCES

### Contact information for the three nationwide credit reporting agencies:

**Equifax**, PO Box 740241, Atlanta, GA 30374, [www.equifax.com](http://www.equifax.com), 1-800-685-1111

**Experian**, PO Box 2104, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742

**TransUnion**, PO Box 2000, Chester, PA 19016, [www.transunion.com](http://www.transunion.com), 1-800-888-4213

**Free Credit Report.** It is recommended that you remain vigilant by reviewing account statements and monitoring your credit report for unauthorized activity, especially activity that may indicate fraud and identity theft. You may obtain a copy of your credit report, free of charge, 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](http://www.annualcreditreport.com) or call toll free at **1-877-322-8228**.

You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's ("FTC") website at [www.consumer.ftc.gov](http://www.consumer.ftc.gov)) to:

Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

### **For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents:**

You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

**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 at least one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft and you have 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.

**Security Freeze.** You have the ability to place a security freeze, also known as a credit freeze, on your credit report free of charge.

A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent. To place a security freeze on your credit report, you may use an online process, an automated telephone line, or submit a written request to any of the three credit reporting agencies listed above. The following information must be included when requesting a security freeze (note that, if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past 5 years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, and display your name, current mailing address, and the date of issue.

**Federal Trade Commission and State Attorneys General Offices.** 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 home state. You may also contact these agencies for information on how to prevent or minimize the risks of identity theft.

#### Federal Agency Contact Information

**Federal Trade Commission** 600 Pennsylvania Avenue, NW, Washington, DC 20580; 202-326-2222; <https://www.consumer.gov/>