



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

Jeffrey J. Boogay
Office: (267) 930-4784
Fax: (267) 930-4771
Email: jboogay@mullen.law

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

August 26, 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 Nelnet Servicing, LLC (“Nelnet Servicing”) located at 121 South 13th Street, Suite 100, Lincoln, NE, 68508, and are writing to notify your office of an incident on behalf of Edfinancial Services LLC (“Edfinancial”) and Oklahoma Student Loan Authority (“OSLA”) that may affect the security of certain personal information relating to approximately thirty-eight thousand five hundred sixty five (38,565) Iowa residents. 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, Nelnet Servicing 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

Nelnet Servicing provides technology services to Edfinancial and OSLA, including a website portal for the student loan borrowers Edfinancial and OSLA services to create and use online access to their loan accounts. Although Nelnet also services student loan accounts, no Nelnet-serviced borrowers were impacted by this incident. On or about July 21, 2022, Nelnet Servicing notified Edfinancial and OSLA that it had discovered a vulnerability it believed led to this incident. Nelnet Servicing informed Edfinancial and OSLA that Nelnet Servicing’s cybersecurity team took immediate action to secure the information system, block the suspicious activity, fix the issue, and launched an investigation with third-party forensic experts to determine the nature and scope of

the activity. On August 17, 2022, this investigation determined that certain student loan account registration information was accessible by an unknown party beginning in June 2022 and ending on July 22, 2022. Following these actions, Nelnet Servicing notified the U.S. Department of Education, which in turn notified law enforcement. The information that could have been subject to unauthorized access includes name, address, email address, phone number, and Social Security number.

Notice to Iowa Residents

On or about August 26, 2022, Nelnet Servicing began providing written notice of this incident to Iowa residents. Below is an approximate breakdown of residents associated with Edfinancial and OSLA:

- Edfinancial – thirty three thousand six hundred thirty two (33,632)
- OSLA – four thousand nine hundred thirty three (4,933)

Written notice to Edfinancial individuals is being provided in substantially the same form as the letter attached here as *Exhibit A*. Written notice to OSLA individuals is being provided in substantially the same form as the letter attached here as *Exhibit B*.

Other Steps Taken and To Be Taken

Upon discovering the event, Nelnet Servicing moved quickly to investigate and respond to the incident, assess the security of Nelnet Servicing systems, notify Edfinancial and OSLA, and identify potentially affected individuals. Further, Nelnet Servicing notified federal law enforcement regarding the event. Nelnet Servicing is providing access to credit monitoring services for 24 months through Experian IdentityWorks to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Nelnet Servicing is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Nelnet Servicing is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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.

Nelnet Servicing is providing written notice of this incident to relevant state and federal regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Office of the Attorney General of Iowa

August 26, 2022

Page 3

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4784.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'J. Boogay', is positioned above the typed name.

Jeffrey J. Boogay of
MULLEN COUGHLIN LLC

JJB/mmc
Enclosure

EXHIBIT A

Edfinancial Services
Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

i2431-L03-0000003 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L03 EDFIN PRIVFFELP
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



August 26, 2022

[Extra1]

Dear Sample:

Edfinancial Services, LLC (Edfinancial), your current or former student loan servicer, is writing to make you aware of an incident that may affect the security of some of your information. While we are not aware of any actual or attempted misuse of your information, we are providing you with an overview of the incident, our ongoing response, and resources available to you right now to protect yourself from any potential consequences.

What happened? On July 21, 2022, Nelnet Servicing, LLC (Nelnet), our servicing system and customer website portal provider, notified us that they had discovered a vulnerability that we believe led to this incident. Nelnet informed us that its cybersecurity team took immediate action to secure the information system, block the suspicious activity, fix the issue, and launched an investigation with third-party forensic experts to determine the nature and scope of the activity. On August 17, 2022, this investigation determined that certain student loan account registration information was accessible by an unknown party beginning in June 2022 and ending on July 22, 2022. Following these actions, they notified the U.S. Department of Education who in turn notified law enforcement. We are fully cooperating with the law enforcement investigations. Edfinancial's systems and accounts that are not hosted by Nelnet were not impacted by this incident.

What information was involved? Nelnet's investigation determined that the impacted information included your name, address, email address, phone number, and Social Security number. This incident did not impact the security of your financial account numbers or payment information.

What are we doing? The confidentiality, privacy, and security of our customers' information is one of our highest priorities. We are notifying potentially impacted individuals, including you, so that we can provide you with services and resources to best protect yourself from any potential consequences should you feel it is appropriate to do so. As a precaution, we are offering you immediate access to credit monitoring and identity theft protection services for 24 months at no cost to you, through Experian. You can find information about how to enroll in these services in the enclosed "*Steps You Can Take to Help Protect Your Personal Information.*" We encourage you to enroll in these services, as we are not able to do so on your behalf.

What can you do? We encourage you to remain vigilant against incidents of identity theft and fraud over the next 24 months, by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. Please also review the information contained in the enclosed "*Steps You Can Take to Help Protect Your Personal Information.*"

0000003



i2431-L03

For more information. We understand you may have questions about this incident that are not addressed in this letter. If you have any questions, please call our dedicated assistance line at (833) 559-0223, Monday through Friday, from 6 a.m. to 8 p.m. PST; Saturday and Sunday, from 8 a.m. to 5 p.m. PST (excluding major US holidays). Be prepared to provide engagement number **B059369** as proof of eligibility for the identity restoration services by Experian. The privacy of your information is critical to us, and we remain committed to ensuring all customer information is safe and secure. We take the matter of security very seriously and deeply regret any inconvenience this may have caused you.

Sincerely,

Edfinancial Services

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for 24 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 24 month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by November 30, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: www.experianidworks.com/credit
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (833) 559-0223 by **November 30, 2022**. Be prepared to provide engagement number **B059369** as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24 MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

0000003



Monitor Your Accounts

Under Federal 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 7 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 to the credit bureaus:

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 all 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
(888) 298-0045	(888) 397-3742	(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. Edfinancial Services, LLC is located at 298 North Seven Oaks Drive, Knoxville, TN 37922

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 10,425 Rhode Island residents impacted by this incident.



Edfinancial Services
Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

i2431-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 EDFIN FSA
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



August 26, 2022

[Extra1]

Dear Sample:

Edfinancial Services, LLC (Edfinancial), your student loan servicer for Federal Student Aid (FSA), is writing to make you aware of an incident that may affect the security of some of your information. While we are not aware of any actual or attempted misuse of your information, we are providing you with an overview of the incident, our ongoing response, and resources available to you right now to protect yourself from any potential consequences.

What happened? On July 21, 2022, Nelnet Servicing, LLC (Nelnet), our servicing system and customer website portal provider, notified us that they had discovered a vulnerability that we believe led to this incident. Nelnet informed us that its cybersecurity team took immediate action to secure the information system, block the suspicious activity, fix the issue, and launched an investigation with third-party forensic experts to determine the nature and scope of the activity. On August 17, 2022, this investigation determined that certain student loan account registration information was accessible by an unknown party beginning in June 2022 and ending on July 22, 2022. Following these actions, they notified the U.S. Department of Education who in turn notified law enforcement. We are fully cooperating with the law enforcement investigations. Edfinancial's systems and accounts that are not hosted by Nelnet were not impacted by this incident.

What information was involved? Nelnet's investigation determined that the impacted information included your name, address, email address, phone number, and Social Security number. This incident did not impact the security of your financial account numbers or payment information.

What are we doing? The confidentiality, privacy, and security of our customers' information is one of our highest priorities. We are notifying potentially impacted individuals, including you, so that we can provide you with services and resources to best protect yourself from any potential consequences should you feel it is appropriate to do so. As a precaution, we are offering you immediate access to credit monitoring and identity theft protection services for 24 months at no cost to you, through Experian. You can find information about how to enroll in these services in the enclosed "*Steps You Can Take to Help Protect Your Personal Information.*" We encourage you to enroll in these services, as we are not able to do so on your behalf.

What can you do? We encourage you to remain vigilant against incidents of identity theft and fraud over the next 24 months, by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. Please also review the information contained in the enclosed "*Steps You Can Take to Help Protect Your Personal Information.*"

0000001



i2431-L01

For more information. We understand you may have questions about this incident that are not addressed in this letter. If you have any questions, please call our dedicated assistance line at (833) 559-0223, Monday through Friday, from 6 a.m. to 8 p.m. PST; Saturday and Sunday, from 8 a.m. to 5 p.m. PST (excluding major US holidays). Be prepared to provide engagement number **B059369** as proof of eligibility for the identity restoration services by Experian. The privacy of your information is critical to us, and we remain committed to ensuring all customer information is safe and secure. We take the matter of security very seriously and deeply regret any inconvenience this may have caused you.

Sincerely,

Edfinancial Services

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for 24 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 24 month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by November 30, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: www.experianidworks.com/credit
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (833) 559-0223 by **November 30, 2022**. Be prepared to provide engagement number **B059369** as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24 MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

0000001



Monitor Your Accounts

Under Federal 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 7 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 to the credit bureaus:

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 all 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
(888) 298-0045	(888) 397-3742	(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. Edfinancial Services, LLC is located at 298 North Seven Oaks Drive, Knoxville, TN 37922

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 10,425 Rhode Island residents impacted by this incident.



EXHIBIT B



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

i2431-L05-0000005 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L05 OSLA FSA
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



August 26, 2022

[Extra1]

Dear Sample:

Oklahoma Student Loan Authority (OSLA), your student loan servicer for Federal Student Aid (FSA), is writing to make you aware of an incident that may affect the security of some of your information. While we are not aware of any actual or attempted misuse of your information, we are providing you with an overview of the incident, our ongoing response, and resources available to you right now to protect yourself from any potential consequences.

What happened? On July 21, 2022, Nelnet Servicing, LLC (Nelnet), our servicing system and customer website portal provider, notified us that they had discovered a vulnerability that we believe led to this incident. Nelnet informed us that its cybersecurity team took immediate action to secure the information system, block the suspicious activity, fix the issue, and launched an investigation with third-party forensic experts to determine the nature and scope of the activity. On August 17, 2022, this investigation determined that certain student loan account registration information was accessible by an unknown party beginning in June 2022, and ending on July 22, 2022. Following these actions, they notified the U.S. Department of Education who in turn notified law enforcement. We are fully cooperating with the law enforcement investigations. OSLA's systems and accounts that are not hosted by Nelnet were not impacted by this incident.

What information was involved? Nelnet's investigation determined that the impacted information included your name, address, email address, phone number, and Social Security number. This incident did not impact the security of your financial account numbers or payment information.

What are we doing? The confidentiality, privacy, and security of our customers' information is one of our highest priorities. We are notifying potentially impacted individuals, including you, so that we can provide you with services and resources to best protect yourself from any potential consequences should you feel it is appropriate to do so. As a precaution, we are offering you immediate access to credit monitoring and identity theft protection services for 24 months at no cost to you, through Experian. You can find information about how to enroll in these services in the enclosed "*Steps You Can Take to Help Protect Your Personal Information.*" We encourage you to enroll in these services, as we are not able to do so on your behalf.

What can you do? We encourage you to remain vigilant against incidents of identity theft and fraud over the next 24 months, by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. Please also review the information contained in the enclosed "*Steps You Can Take to Help Protect Your Personal Information.*"

0000005



i2431-L05

For more information. We understand you may have questions about this incident that are not addressed in this letter. If you have any questions, please call our dedicated assistance line at (833) 559-0246, Monday through Friday, from 6 a.m. to 8 p.m. PST; Saturday and Sunday, from 8 a.m. to 5 p.m. PST (excluding major US holidays). Be prepared to provide engagement number **B059370** as proof of eligibility for the identity restoration services by Experian. The privacy of your information is critical to us, and we remain committed to ensuring all customer information is safe and secure. We take the matter of security very seriously and deeply regret any inconvenience this may have caused you.

Sincerely,

Oklahoma Student Loan Authority

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for 24 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 24-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by November 30, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: www.experianidworks.com/credit
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (833) 559-0246 by **November 30, 2022**. Be prepared to provide engagement number **B059370** as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24 MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

0000005



Monitor Your Accounts

Under Federal 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 7 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 to the credit bureaus:

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 all 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
(888) 298-0045	(888) 397-3742	(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. Oklahoma Student Loan Authority is located at 525 Central Park Dr., Ste. 600, Oklahoma City, OK 73105 and may be contacted by mail at P.O. Box 18475, Oklahoma City, OK 73154-0475.

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 1,193 Rhode Island residents impacted by this incident.

