NORTON ROSE FULBRIGHT

September 26, 2024

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Via Email: consumer@ag.iowa.gov

Consumer Protection Division
Security Breach Notifications
1305 E. Walnut Street
Des Moines, IA 50319-0106

Re: *Supplemental Legal Notice of Cybersecurity Incident*

Dear Sir or Madam:

I am writing on behalf of my client, CF Medical, to inform you that CF Medical's former vendor, Financial Business and Consumer Solutions, Inc. ("FBCS") was the target of a cybersecurity incident that may have involved personal information belonging Iowa residents associated with CF Medical.

According to FBCS, upon detecting the incident on February 26, 2024, FBCS launched an investigation and engaged third-party forensic specialists to determine the nature of scope of the incident. FBCS's investigation determined that its environment was subject to unauthorized access between February 14, 2024 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 unauthorized access. FBCS undertook a comprehensive review of the data involved to determine whether it contained any personal information and, if so, to whom the information related. FBCS has not identified any evidence of misuse of information related to this incident.

Nonetheless, on April 4, 2024, FBCS notified CF Medical that information belonging to individuals associated with certain of CF Medical's clients' accounts may have been involved in the incident. FBCS offered to provide notifications to individuals and regulators on CF Medical's behalf. Upon receiving the initial notice, CF Medical began reaching out to its clients to inform them of the incident, and offered the option to opt-in or opt-out to the notices being provided by FBCS. Accordingly, as CF Medical received responses from its clients, CF Medical instructed FBCS to notify individuals and/or regulators as directed. Beginning on or around June 19th, FBCS began notifying individuals, and state regulators, including your office, on behalf of CF Medical and its clients.

On July 15, 2024, FBCS notified CF Medical that the data review exercise identified additional accounts associated with CF Medical and its clients. The following day, on July 16, FBCS provided a list of those individuals. CF Medical reviewed that list to identify the clients associated with each individual. The personal information involved includes names and Social Security numbers. In some instances, health information may also be involved.

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On August 21, 2024, FBCS notified CF Medical that FBCS was no longer supporting individual notifications, but would continue to supplement regulatory notices as directed. At this time, CF Medical began to prepare to notify individuals directly.

CF Medical provided direction on regulatory notices on its behalf, and its clients' behalf, to FBCS on September 9, 2024. However, on September 16, 2024, FBCS's outside counsel informed us that FBCS filed a petition for bankruptcy and a Trustee was appointed. Accordingly, FBCS would not be proceeding with the previously offered regulator notifications until the Trustee provides additional guidance.

Accordingly, CF Medical is providing this notification to your office to inform you that, today, September 26, 2024, CF Medical will begin mailing notification letters to 2,027 additional Iowa residents. CF Medical is offering 12 months of complimentary credit monitoring and fraud protection services to all Iowa residents receiving notice. A copy of the notification letter is attached. CF Medical is also providing a toll-free hotline for individuals to call with any questions regarding the incident.

Prior to the incident, CF Medical terminated its business relationship with FBCS for unrelated reasons.

If you have any questions or need further information regarding this incident, please do not hesitate to contact me.

Respectfully submitted,

Will Daugherty

CF Medical
Secure Processing Center
P.O. Box 3826
Suwanee, GA 30024

Postal Endorsement Line
<<Full Name>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<City>>, <<State>> <<Zip>>
<<Country>>
***Postal IMB Barcode

Notice of Data Breach <<Date>>

Dear <<Full Name>>:

This notice is to make you aware of a cybersecurity incident that occurred at the debt collection agency, Financial Business and Consumer Solutions, Inc. ("FBCS"). 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. In response, FBCS 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. FBCS's investigation determined that the environment was subject to unauthorized access between February 14, 2024 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 potentially involved to identify individuals whose personal information may be contained in the files.

What Information Was Involved? In July 2024, FBCS's review determined that some of your personal information was contained in the data involved, including your name, <<data elements>>. In some instances, health information may have also been involved. FBCS has no indication that your information has been misused in relation to this event.

What We Are Doing. While we have no evidence to suggest that your information was targeted or misused for purposes of fraud or identity theft, as a precaution, we are offering a complimentary <<12/24>> month membership of CyEx Identity Defense Complete credit and identity restoration services for <<12/24>> months. This product provides you with superior identity protection and resolution of identity theft. Identity Defense Complete 1B is completely free to you and enrolling in this program will not hurt your credit score.

What You Can Do. For more information on Identity Defense Complete, including instructions on activating your complimentary <<12/24>> month membership, as well as information on additional steps you can take in response to this incident, please see the pages that follow this letter.

For More Information. If you have questions, please call 888-788-8017, Monday through Friday between 9:00 a.m. and 9:00 p.m. Eastern Time, excluding major U.S. holidays.

Sincerely,

CF Medical*

**FBCS previously provided services to CF Medical.*

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

Enroll in Credit Monitoring

Enter your Activation Code: <<Activation Code>>
Enrollment Deadline: <<Enrollment Deadline>>
Service Term: <<12/24>> months*

Identity Defense

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/cap

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; 1-410-528-6300 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 #>> Rhode Island residents that may be impacted by this event.