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Via eMail: consumer@ag.iowa.gov

The Honorable Tom Miller
Consumer Protection Division
Security Breach Notifications
Office of the Attorney General of Iowa
1305 E. Walnut Street
Des Moines, Iowa 50319-0106

Re: Security Incident Notification

Dear Attorney General Miller:

We are writing to provide notice on behalf of focusIT, Inc. ("focusIT" or the "Company") to the Iowa Office of the Attorney General, pursuant to Iowa Code § 715C.1-2, regarding an incident involving 626 Iowa residents.

On August 2, 2022, focusIT learned that an unknown threat actor compromised a third party system in the focusIT environment containing the name, Social Security number and in some instances, the date of birth of a small percentage of focusIT's business customers' account holders or applicants. focus IT immediately engaged third-party cyber security experts to investigate and remediate the incident, who determined that the incident lasted from June 1, 2022 to August 3, 2022.

focusIT took immediate steps relating to the incident (e.g., hired a third party forensics team, notified law enforcement and business customers, securely deleted data, discontinued use of the compromised system, reset credentials, and upgraded cyber-security protection). In addition, the Company worked with state and federal law enforcement and state regulators. Finally, the Company hired external vendors to conduct an external security audit, to provide additional recommendations and to implement and manage improvements.

On or about September 29, 2022, focusIT will mail notice to the affected Iowa residents, offering a 12 month subscription to credit monitoring, identity protection services and up to \$1,000,000 in identity theft insurance coverage through Equifax, at no cost.

The incident affected 626 Iowa residents, and focusIT is providing this notice on behalf of 12 focusIT business customers.

A sample notification letter is enclosed. Should you have any questions regarding this matter or if we can be of any further assistance to the Iowa resident(s) affected by this incident, please contact us at lael.bellamy@us.dlapiper.com.

Respectfully submitted,

Lael Bellamy

Lael Bellamy
Of Counsel



focusIT

14362 N Frank Lloyd Wright Blvd
Suite #1000
Scottsdale AZ 85260

September 28, 2022

XXXXXXXXXX XXXXX
XXX XXXXXX Xx
XXXX XXXXXXXXXXXX XX XXXXXX

Re: NOTICE OF DATA BREACH

Dear XXXXXXXXXXXX XXXXX:

We write to inform you of a recent incident that may have involved personal information about you.

WHAT HAPPENED? On August 2, 2022, focusIT, Inc., a third-party vendor of XXXXX XXXXXXXXXXXX, who facilitates Residential Mortgage application processing, was notified by the Texas Financial Crimes Intelligence Center that unknown threat actor(s) potentially compromised a third party system in the focusIT environment. This compromise resulted in your personal information potentially being accessed by unknown threat actors. This incident was swiftly investigated and contained.

WHAT INFORMATION WAS INVOLVED? Personal information of applicants or account holders including your name, date of birth, address, and Social Security number.

WHAT WE ARE DOING. As a victim of this crime, we are working with the appropriate law enforcement and regulatory officials including the FBI. Please know that protecting your personal information is something that we take very seriously. We apologize for both this unfortunate incident and any inconvenience it may cause you. We are providing notice and offering free credit monitoring services to certain individuals based on the personal information that was potentially exposed. If you believe your personal information was affected, please contact us so that we may pursue our investigation to the fullest extent of the law.

WHAT YOU CAN DO. The Federal Trade Commission (FTC) recommends that you remain vigilant by checking your credit reports periodically. Checking your credit reports can help you spot problems and address them quickly. You can also order free copies of your annual reports through www.annualcreditreport.com. You should monitor your financial accounts for any suspicious activity. For more information about steps you can take to reduce the likelihood of identity theft or fraud, call 1-877-ID-THEFT (877-438-4338), visit the FTC’s website at <http://www.ftc.gov/bcp/edu/microsites/idtheft/>, or write to: Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580. However, if you believe you are the victim of identity theft, you should immediately contact your local law enforcement agency, your state’s attorney general, or the FTC. In addition, the National Cyber Security Alliance offers tips to protect yourself online at: <https://staysafeonline.org/resources/online-safety-privacy-basics/>.

We have arranged for you to receive free credit monitoring services to help you protect your identity and credit information. (See enclosed instructions.) If you choose to enroll, you will receive communications detailing any key changes to your credit reports. Your coverage will last for 1 year from the date of enrollment.

OTHER IMPORTANT INFORMATION.

Contact Information for Consumer Reporting Agencies and Information on Credit Report Fraud Alerts

You may also choose to place a fraud alert on your credit file, which is free of charge to you and can be done with any *one* of the companies listed below (i.e., if you place a fraud alert with one company, they will automatically notify the others). A fraud alert tells creditors to contact you *before* they open any new accounts or change your existing accounts.

	Experian	Equifax	TransUnion
Phone	1-888-397-3742	1-800-525-6285 or 1-888-766-0008	1-800-680-7289
Address	Experian Fraud Division P.O. Box 9554 Allen, TX 75013	Equifax Consumer Fraud Division PO Box 105069 Atlanta, GA 30348	TransUnion LLC P.O. Box 2000 Chester, PA 19016
Online Fraud Alert Form	https://www.experian.com/fraud/center.html	https://www.equifax.com/personal/credit-report-services/	https://fraud.transunion.com/fraudAlert/landingPage.jsp

Information on Security Freezes

In addition to a fraud alert, you may place a security freeze on your credit file. A security freeze will block a credit bureau from releasing information from your credit report without your prior written authorization. Please be aware that it may delay, interfere with, or prevent the timely approval of any requests you make for new loans, mortgages, employment, housing or other services. There is no charge to place, temporarily lift or remove a freeze.

To place a security freeze on your credit report, you may send a written request to **each** of the major consumer reporting agencies by mail or place a security freeze online by visiting **each** consumer reporting agency online.

	Experian	Equifax	TransUnion
Address	Experian Security Freeze P.O. Box 9554 Allen, TX 75013	Equifax Security Freeze P.O. Box 105788 Atlanta, Georgia 30348	TransUnion LLC P.O. Box 160 Woodlyn, PA 19094
Online Security Freeze Form	https://www.experian.com/freeze/center.html	https://www.equifax.com/personal/credit-report-services	https://www.transunion.com/credit-freeze

FOR MORE INFORMATION. If you have any questions, please feel free to call **1-888-572-6971**. We sincerely regret that this incident occurred.

Sincerely,

focusIT Security Team

State-Specific Information

If you are a resident of the following states, the following information applies to you.

For residents of Maryland, New York, North Carolina, Rhode Island, and the District of Columbia: For information on how to avoid identity theft or to contact your state's attorney general, please use the below information.

Maryland Attorney General	North Carolina Attorney General	Rhode Island Attorney General
1-888-743-0023 https://www.marylandattorneygeneral.gov/ Attorney General of Maryland 200 St. Paul Place Baltimore, MD 21202	1-877-566-7226 http://www.ncdoj.gov Attorney General's Office 9001 Mail Service Center Raleigh, NC 27699-9001	1-401-274-4400 http://www.riag.ri.gov/ Attorney General of Rhode Island 150 South Main Street Providence, RI 02903
District of Columbia Attorney General	New York Attorney General	
1-202-727-3400 https://oag.dc.gov Attorney General, District of Columbia 400 6 th Street, NW Washington, DC 20001	1-800-771-7755 https://ag.ny.gov/ Office of the Attorney General The Capitol Albany, NY 12224-0341	

For residents of New Mexico: You have rights under the federal Fair Credit Reporting Act (FCRA). These include: the right to access information in your consumer file at a consumer reporting agency; to dispute incomplete or inaccurate information in your consumer file at a consumer reporting agency; to have consumer reporting agencies correct or delete inaccurate information in your consumer file; the right to block information in your consumer file that is the result of identity theft; and the right to have a fraud alert placed on your consumer file (as described above). For more information, please visit <https://www.consumer.ftc.gov/> or <https://www.consumerfinance.gov/learnmore/>.

For residents of Rhode Island: Under Rhode Island law, you have the right to obtain a police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

Based on our investigation to date, we believe this incident affected the personal information of fewer than 461 individuals in Rhode Island.



XXXXXXXXXX XXXXX
Enter your Activation Code: #####
Enrollment Deadline: **December 31, 2022**

Equifax Credit Watch™ Gold

*Note: You must be over age 18 with a credit file to take advantage of the product

Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications¹ when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts², which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock³
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁴

Enrollment Instructions

Go to www.equifax.com/activate

Enter your unique Activation Code of ##### then click “Submit” and follow these 4 steps:

1. **Register:**

Complete the form with your contact information and click “Continue”.

If you already have a myEquifax account, click the ‘Sign in here’ link under the “Let’s get started” header.

Once you have successfully signed in, you will skip to the Checkout Page in Step 4

2. **Create Account:**

Enter your email address, create a password, and accept the terms of use.

3. **Verify Identity:**

To enroll in your product, we will ask you to complete our identity verification process.

4. **Checkout:**

Upon successful verification of your identity, you will see the Checkout Page.

Click ‘Sign Me Up’ to finish enrolling.

You’re done!

The confirmation page shows your completed enrollment.

Click “View My Product” to access the product features.

¹WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded. ²The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC. ³Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com ⁴The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.