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Hotline: 877-382-2724 (877-DTA-BRCH)

September 4, 2025

VIA EMAIL

Attorney General Brenna Bird
Office of the Attorney General
Consumer Protection Division
Security Breach Notifications
1305 E Walnut Street
Des Moines, IA 50319-0106
Tel: 515-281-6771

Re: Notice of Data Security Incident

Dear Attorney General Bird:

Constangy, Brooks, Smith & Prophete LLP ("Constangy") represents Cornwell Quality Tools ("Cornwell") in connection with a data security incident described in greater detail below. The purpose of this letter is to notify you of the incident in accordance with Iowa's data breach notification statute, Iowa Code §§ 715C.1, 715C.2.

1. Nature of the Security Incident

On December 20, 2024, Cornwell became aware of unusual activity within its computer network and immediately took steps to secure its systems, engaging cybersecurity experts in the process. According to its investigation, an unknown actor gained access to Cornwell's network and potentially acquired certain files on or around December 12, 2024. Following a comprehensive review of the affected files, Cornwell determined that certain individuals' personal information may have been involved in this incident. Cornwell then began working diligently to collect up-to-date mailing addresses in order to provide notification of the incident, which was completed on August 4, 2025.

2. Number of Affected Iowa Residents & Information Involved

The incident involved personal information for 616 Iowa residents. The information involved in the incident includes name and Social Security Number and financial account number.

3. Notification to Affected Individual(s)

On September 4, 2025, a notification letter was sent to the affected Iowa residents by USPS First Class Mail. The notification letter provides resources and steps individuals can take to help protect

their information, including the opportunity to enroll in complimentary Single Bureau Credit Monitoring/Single Bureau Credit Report/Single Bureau Credit Score services through IDX. These services also include proactive fraud assistance in the event individuals become a victim of fraud. A sample notification letter is enclosed.

4. Measures Taken to Address the Incident

Upon discovering this incident, Cornwell took the steps described above and retained cybersecurity experts to learn more about what happened and what information could have been affected. Cornwell also implemented additional security measures to further harden its environment in an effort to prevent a similar event from occurring in the future. Finally, Cornwell is notifying the affected individuals and providing them with steps they can take to protect their personal information.

5. Contact Information

If you have any questions or need additional information, please do not hesitate to contact me at dmcmillan@constangy.com or 718.750.5187.

Sincerely,

David McMillan
Partner, Cybersecurity & Data Privacy Team

Enc.: Sample Notification Letter

P.O. Box 989728
West Sacramento, CA 95798-9728

Enrollment Code: <<ENROLLMENT>>
Enrollment Deadline: December 4, 2025
To Enroll, Scan the QR Code Below:

SCAN ME

Or Visit:
https://response.idx.us/cornwell

<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>
<<Country>>

September 4, 2025

Subject: Notice of Data <<Variable Data 2 - Breach / Security Incident>>

Dear <<First Name>> <<Last Name>>:

Cornwell Quality Tools ("Cornwell") writes to notify you regarding a data security incident that may have affected the privacy of your information. Cornwell takes this incident seriously and is providing you with information about the incident, our response, and steps you can take to help protect your information.

What Happened. On December 20, 2024, Cornwell became aware of unusual activity within our computer network and immediately took steps to secure our systems, engaging external cybersecurity experts in the process. According to our investigation, an unknown actor gained access to our network and potentially acquired certain files on or around December 12, 2024. Following a comprehensive review of the affected files, we learned that certain individuals' personal information may have been involved in this incident. We then began working diligently to collect up-to-date mailing addresses in order to provide notification of the incident, which we completed on August 4, 2025.

What Information Was Involved. The information that was potentially involved in this incident included your name as well as your <<Variable Data 1 - Impacted data elements>>.

What We Are Doing. As soon as Cornwell discovered this incident, we took the steps described above and implemented measures to enhance security and minimize the risk of a similar incident occurring in the future. We also notified the Federal Bureau of Investigation and will cooperate with any resulting investigation.

In addition, we are offering you the opportunity to enroll in complimentary credit monitoring and identity theft protection services through IDX, a data breach and recovery services expert. These services include <<12/24>> months of credit monitoring, dark web monitoring, a $1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised. Please note the deadline to enroll in these services is December 4, 2025.

What You Can Do: Please review the guidance included with this letter, which includes additional steps you can take to help protect your personal information. You can also enroll in the complimentary services we are offering to you through IDX by using the enrollment code provided above.

For More Information: If you have questions about this letter or need assistance, please call IDX at 1-833-353-4106 Monday through Friday from 9:00 am – 9:00 pm Eastern Time. IDX representatives are fully versed in this incident and can answer questions you may have.

We take your trust in us and this matter very seriously. Please accept our sincere apologies for any worry or inconvenience this may cause.

Sincerely,

Cornwell Quality Tools

Steps You Can Take to Help Protect Your Personal Information

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (the "FTC").

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting www.annualcreditreport.com, calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You also can contact one of the following three national credit reporting agencies:

Equifax
P.O. Box 740241
Atlanta, GA 30374
1-800-525-6285
www.equifax.com

Experian
P.O. Box 9532
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19016
1-833-799-5355
www.transunion.com

Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at www.annualcreditreport.com.

Security Freeze: You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

Federal Trade Commission
600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov
877-438-4338

Maryland Attorney General
200 St. Paul Place
Baltimore, MD 21202
www.marylandattorneygeneral.gov/Pages/CPD
888-743-0023

Oregon Attorney General
1162 Court St., NE
Salem, OR 97301
www.doj.state.or.us/consumer-protection
877-877-9392

California Attorney General
1300 I Street
Sacramento, CA 95814
www.oag.ca.gov/privacy
800-952-5225

New York Attorney General
The Capitol
Albany, NY 12224
800-771-7755
ag.ny.gov

Rhode Island Attorney General
150 South Main Street
Providence, RI 02903
www.riag.ri.gov
401-274-4400

Iowa Attorney General
1305 E. Walnut Street
Des Moines, Iowa 50319
www.iowaattorneygeneral.gov
888-777-4590

NY Bureau of Internet and Technology
28 Liberty Street
New York, NY 10005
www.dos.ny.gov/consumerprotection/
212.416.8433

Washington D.C. Attorney General
400 S 6th Street, NW
Washington, DC 20001
oag.dc.gov/consumer-protection
202-442-9828

Kentucky Attorney General
700 Capitol Avenue, Suite 118
Frankfort, Kentucky 40601
www.ag.ky.gov
502-696-5300

NC Attorney General
9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov/protectingconsumers/
877-566-7226

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit www.consumer.ftc.gov/sites/default/files/articles/pdf/pdf-0096-fair-credit-reporting-act.pdf.