Carolyn Purwin Ryan
Office: (267) 930-6836
Fax: (267) 930-4771
Email: CPurwinRyan@mullen.law

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

September 6, 2024

VIA E-MAIL

Office of the Attorney General of Iowa
Consumer Protection Division
Security Breach Notifications
1305 E. Walnut Street
Des Moines, IA 50319-0106
E-mail: consumer@ag.iowa.gov

Re: Notice of Data Event

To Whom It May Concern:

We represent Slim CD, Inc. ("Slim CD") located at 610 North University Drive, Coral Springs, Florida, 33071, and are writing to notify your office of an incident that may affect the security of certain personal information relating to one thousand one hundred forty-three (1,143) Iowa residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Slim CD 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

Slim CD is a processing gateway that handles electronic payments including credit cards. On or about June 15, 2024, Slim CD became aware of suspicious activity in its computer environment. Upon learning of the activity, Slim CD launched an investigation to determine the full nature and scope of the activity. Slim CD engaged, through counsel, a third-party specialist to investigate the incident. The investigation identified unauthorized system access between August 17, 2023, and June 15, 2024. That access may have enabled an unauthorized actor to view or obtain certain credit card information between June 14, 2024, and June 15, 2024. Slim CD subsequently conducted a comprehensive review of the accessible credit card information to identify the potentially affected cardholders, and this review recently concluded.

The information that could have been subject to unauthorized access includes name, address, credit card number, and card expiration date.

Notice to Iowa Residents

On or about September 6, 2024, Slim CD provided notice of this incident to one thousand one hundred forty-three (1,143) Iowa residents. Additionally, Slim CD is also notifying potentially affected individuals by providing notification to relevant media outlets and on its website. Notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon discovering the event, Slim CD moved quickly to investigate and respond to the incident, assess the security of Slim CD systems, and identify potentially affected individuals. Further, Slim CD notified federal law enforcement regarding the event. Slim CD continues to review and enhance its existing policies and procedures relating to data protection and security. Slim CD has also implemented additional security measures to mitigate risk associated with this incident and to help prevent future similar incidents.

Additionally, Slim CD is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Slim CD is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, 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. Slim CD is also providing written notice of this incident to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-6836.

Very truly yours,

Carolyn Purwin Ryan of
MULLEN COUGHLIN LLC

CPR/msz
Enclosure

EXHIBIT A

<<Variable Header>>

<<Date>>

Dear <<First Name>> <<Last Name>>,

Slim CD, Inc. ("Slim CD") writes to notify you of an incident that may affect the privacy of some of your information. Slim CD is a processing gateway that handles electronic payments, including credit card payments for US and Canadian based merchants. You are receiving this notice because you used a credit card for payment at a merchant that uses our services. This email provides you details of the incident, our response, and steps that you may take to better protect against the possible misuse of your information. Slim CD takes the data privacy of our merchants and customers very seriously. We are committed to keeping your personal information secure, and we apologize to you for any concern and frustration this incident may cause.

What Happened? On or about June 15, 2024, Slim CD became aware of suspicious activity in its computer environment. Upon learning of the activity, Slim CD launched an investigation to determine the full nature and scope of the activity. Slim CD engaged, through counsel, a third-party specialist to investigate the incident. The investigation identified unauthorized system access between August 17, 2023, and June 15, 2024. That access may have enabled an unauthorized actor to view or obtain certain credit card information between June 14, 2024, and June 15, 2024. Slim CD reviewed the accessible credit card information to identify the potentially affected cardholders so that it could notify those individuals.

What Information Was Involved? Slim CD determined that types of information potentially impacted by this incident include your name, address, credit card number, and card expiration date.

What We Are Doing. We take the confidentiality, privacy, and security of information in our possession very seriously. Upon discovery of this incident, we quickly commenced a thorough investigation and took steps to implement additional safeguards and review our policies and procedures relating to data privacy and security. We also took steps to report this incident to federal law enforcement, and regulatory authorities, as required by law.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. You can find more information about obtaining a free copy of your credit report, protecting against potential identity theft and fraud, and other resources available to you in the below *Steps Individuals Can Take To Help Protect Personal Information*.

For More Information. If you have questions or concerns, please contact our dedicated assistance line at 1-877-212-3538, from 9 a.m. – 9 p.m. Eastern Time (ET), Monday through Friday. You can also write to Slim CD at 610 North University Drive, Coral Springs, Florida, 33071.

Sincerely,

Slim CD

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

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 a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any 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 a consumer's name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of the following information:

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 they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, 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
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

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect their personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state Attorney General. This notice has not been delayed by law enforcement.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 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 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; 1-401-274-4400; and www.riag.ri.gov. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. There are approximately [#] Rhode Island residents that may be impacted by this event.