



November 17, 2023

U.S. MAIL

Attorney General John Formella
Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301

RECEIVED

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CONSUMER PROTECTION

Re: Notice of Data Security Incident

Dear Attorney General Formella:

Constangy, Brooks, Smith & Prophete, LLP, represents Forward Bank in connection with a recent data security incident described in greater detail below. This notice is being sent because personal information for New Hampshire residents may have been involved in the incident.

1. Nature of the Security Incident

On September 10, 2023, Forward Bank experienced a network disruption and immediately initiated an investigation of the matter. Forward Bank engaged cybersecurity experts to assist and investigate. The investigation determined that certain files may have been acquired without authorization on or about September 6, 2023. After a thorough review of those files, on or about October 27, 2023, Forward Bank identified that customer information was involved in the incident. Since then, Forward Bank has been preparing to notify all potentially affected customers.

2. Number of New Hampshire Residents Involved

On November 17, 2023, Forward Bank notified two (2) New Hampshire residents of this data security incident via U.S. First-Class Mail. A sample copy of the notification letter sent to the impacted individuals is included with this correspondence.

The personal information involved in this incident includes

3. Steps Taken to Address the Incident

As soon as Forward Bank discovered the network disruption, it took steps to secure the affected systems and launched an investigation to determine whether, and to what extent, personal information had been accessed or acquired without authorization. Forward Bank has also implemented additional security measures in an effort to prevent a similar incident from occurring

in the future. Further, as referenced in the sample consumer notification letter, Forward Bank has offered individuals of complimentary identity protection services through IDX.

Forward Bank has also established a toll-free call center through IDX to answer questions about the incident and address related concerns.

4. Contact Information

Forward Bank remains dedicated to protecting the information in its control. If you have any questions or need additional information, please do not hesitate to contact me at

Sincerely,

Aubrey Weaver
Partner
Constangy, Brooks, Smith & Prophete, LLP

Enclosure: Sample Notification Letter



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

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

November 17, 2023

Subject: Notice of Data <<Variable 1>>

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

I am writing to inform you of a data security incident that may have affected your personal information. At Forward Bank, we take the privacy and security of personal information very seriously. This is why we are informing you of the incident, providing you with steps you can take to protect your personal information, and offering you complimentary credit monitoring and identity protection services.

What Happened. On September 10, 2023, Forward Bank experienced a network disruption and immediately initiated an investigation of the matter. We engaged cybersecurity experts to assist with the process. The investigation determined that certain files may have been acquired without authorization on or about September 6, 2023. After a thorough review of those files, on or about October 27, 2023, some of your personal information was identified as being contained within the potentially affected data.

What Information Was Involved. The information may have included your <<Variable 2 - Data Elements>>. Please note we have no reason to believe this incident involved unauthorized access to customer accounts or funds.

What We Are Doing. As soon as Forward Bank discovered the incident, we took the steps described above and implemented measures to enhance network security and minimize the risk of a similar incident occurring in the future. We also notified the Federal Deposit Insurance Corporation and the Federal Bureau of Investigation and will provide whatever cooperation may be necessary to hold the perpetrators accountable.

As part of our commitment to protecting our customers, we are offering you complimentary credit monitoring and identity protection services through IDX, A ZeroFox Company, a data breach and recovery services expert. IDX identity protection services include: <<12 months/24 months>> of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed ID theft recovery services. With this protection, IDX will help you resolve issues if your information is compromised.

What You Can Do. You can follow the recommendations on the following page to help protect your personal information. We encourage you to contact IDX with any questions and to enroll in the free identity protection services by calling 1-888-796-4226, going to <https://response.idx.us/Forward-Bank>, and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 8 am - 8 pm Central Time. Please note the deadline to enroll is February 17, 2024.

In addition, Forward Bank recommends that all customers remain vigilant of any communications that appear to come from Forward Bank. For best practices on privacy and security tips, please visit <https://www.forward.bank/resources/security-tips/>.

For More Information. Further information about how to protect your personal information appears on the following page. If you have questions or need assistance, please call 1-888-796-4226 Monday through Friday from 8 am - 8 pm Central Time. We take your trust in us and this matter very seriously.

Forward Bank takes data privacy and security very seriously. Please accept our sincere apologies for any worry or inconvenience this may cause.

Sincerely,

Bill Sennholz, CEO

Forward Bank
1001 N. Central Ave.
Marshfield, Wisconsin 54449

STEPS YOU CAN TAKE TO 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 (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 <http://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 105851
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian

P.O. Box 9701
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion

P.O. Box 2000
Chester, PA 19016
1-800-916-8800
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 <http://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, and
www.ftc.gov/idtheft
1-877-438-4338

Maryland Attorney General

200 St. Paul Place
Baltimore, MD 21202
oag.state.md.us
1-888-743-0023

New York Attorney General

Bureau of Internet and Technology
Resources
28 Liberty Street
New York, NY 10005
1-212-416-8433

North Carolina Attorney General

9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov
1-877-566-7226

Rhode Island Attorney General

150 South Main Street
Providence, RI 02903
<http://www.riag.ri.gov>
1-401-274-4400

Washington D.C. Attorney General

441 4th Street, NW
Washington, DC 20001
oag.dc.gov
1-202-727-3400

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 <https://www.consumer.ftc.gov/sites/default/files/articles/pdf/pdf-0096-fair-credit-reporting-act.pdf>.