



MULLEN  
COUGHLIN<sup>LLC</sup>  
ATTORNEYS AT LAW

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

December 21, 2023

**VIA E-MAIL**

Office of the New Hampshire Attorney General  
Consumer Protection & Antitrust Bureau  
33 Capitol Street  
Concord, NH 03301  
E-mail: [DOJ-CPB@doj.nh.gov](mailto:DOJ-CPB@doj.nh.gov)

**Re: Notice of Data Event**

To Whom It May Concern:

We represent the Middlefield Banking Company (“Middlefield Bank”) located at 15545 West High Street, Middlefield, OH 44062, and write to provide notice of a data security event that may impacted the security of personal information relating to fifty-four (54) New Hampshire residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission.

**Nature of the Data Event**

On or about April 12, 2023, Middlefield Bank experienced a data security incident that impacted certain computer systems and caused a temporary disruption to certain corporate operations. Middlefield Bank promptly responded and launched an investigation with the assistance of outside specialists to confirm the nature and scope of the incident. Through the investigation, Middlefield Bank learned that an unauthorized actor accessed certain systems and may have viewed or acquired certain files relating to Middlefield Bank employees and customers between April 11, 2023 until April 12, 2023. Middlefield Bank conducted a thorough review of the information contained in these files to determine if they contain sensitive information. Middlefield Bank recently concluded the review and determined on or around November 21, 2023 that personal information was included in the potentially impacted data set.

The information that could have been subject to unauthorized access includes

### **Notice to New Hampshire Residents**

On or about December 21, 2023, Middlefield Bank provided written notice of this incident to fifty-four (54) New Hampshire residents. Written 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, Middlefield Bank moved quickly to investigate and respond to the incident, assess the security of Middlefield Bank systems, and identify potentially affected individuals. Further, Middlefield Bank notified federal law enforcement regarding the event. Middlefield Bank is also working to implement additional safeguards and training to its employees. Middlefield Bank is providing access to credit monitoring services for through TransUnion, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Middlefield Bank 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. Middlefield Bank is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, 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. Middlefield Bank is also providing notice of this incident to relevant state and federal regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion. Middlefield Bank also notified federal law enforcement and is cooperating with its investigation.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at .

Very truly yours,

Richard Aponte-Boyd of  
MULLEN COUGHLIN LLC

RAB/jrl  
Enclosure

# **EXHIBIT A**



Return mail will be processed by: IBC  
PO Box 847 • Holbrook, NY 11741



December 21, 2023

## NOTICE OF SECURITY INCIDENT

Dear [REDACTED]:

The Middlefield Banking Company (“Middlefield Bank”) writes to make you aware of a recent incident that may impact the privacy of some of your information. We are providing you with notice of the incident, steps we have taken in response, and resources available to help you better protect your information, should you feel it is appropriate to do so.

**What Happened?** On or about April 12, 2023, Middlefield Bank experienced a data security incident that impacted certain computer systems and caused a temporary disruption to certain corporate operations. We promptly responded and launched an investigation with the assistance of outside specialists to confirm the nature and scope of the incident. Through the investigation, we learned that an unauthorized actor accessed certain systems and acquired certain files relating to Middlefield Bank employees and customers between April 11, 2023 until April 12, 2023. We conducted a thorough review of the data that was potentially viewed or acquired to determine whether it contained any sensitive information. We recently concluded our review and determined on or around November 21, 2023 that information related to you was included in the potentially impacted data set. After determining the scope of information in the potentially impacted files, we undertook efforts to locate address information for the affected individuals, put resources in place to assist, and provide this direct notice.

**What Information Was Involved?** The information present in the files that may have been viewed or acquired as a result of this incident included your [REDACTED].

**What We Are Doing.** We treat our responsibility to safeguard the information entrusted to us as an utmost priority. As such, we responded immediately to this incident and have been working diligently to provide you with an accurate and complete notice of the incident. Our immediate response to this event also included prompt and continued correspondence with federal law enforcement authorities. As part of our ongoing commitment to the privacy and security of information in our care, we have reviewed our existing policies and procedures relating to data protection and security and implemented enhanced security controls.

As an added precaution, we are providing you with [REDACTED] of complimentary access to credit monitoring and identity restoration services provided by Cyberscout through Identity Force, a TransUnion company specializing in fraud assistance and remediation services, as well as guidance on how to better protect your information. Although we are covering the cost of these services, you will need to complete the activation process yourself using the enrollment instructions included within the enclosure to this letter, as we cannot enroll you in the services on your behalf.

**What You Can Do.** You can find out more about how to safeguard your information in the enclosed *Steps You Can Take to Protect Personal Information*. There, you will find additional information about the complimentary credit monitoring and identity restoration services we are offering and how to enroll. We encourage you to reset usernames and passwords and 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 over the next 12 to 24 months.

**For More Information.** We understand you may have questions about this incident that are not addressed in this letter. To ensure your questions are answered in a timely manner, please call our dedicated assistance line at [888-814-0568], Monday through Friday from 9:00 am - 7:00 pm Eastern Time, excluding U.S. holidays.

Sincerely,

*Ronald L. Zimmerly*

Ronald L. Zimmerly  
President

MID-ADT

## **STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION**

### **Enroll in Monitoring Services**

In response to the incident, we are providing you with access to **Single Bureau Credit Monitoring** at no charge. These services provide you with alerts for \_\_\_\_\_ from the date of enrollment when changes occur to your credit file. This notification is sent to you the same day that the change or update takes place with the bureau. These services will be provided by Cyberscout through Identity Force, a TransUnion company specializing in fraud assistance and remediation services.

### **How do I enroll for the free services?**

To enroll in Credit Monitoring services at no charge, please log on to <https://secure.identityforce.com/benefit/mfb> and follow the instructions provided. When prompted please provide the following unique code to receive services: [REDACTED]. In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter. The enrollment requires an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

### **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](http://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**  
[https://www.equifax.com/  
personal/credit-report-services/](https://www.equifax.com/personal/credit-report-services/)

1-888-298-0045

*Equifax Fraud Alert*  
P.O. Box 105069  
Atlanta, GA 30348-5069

*Equifax Credit Freeze*  
P.O. Box 105788  
Atlanta, GA 30348-5788

**Experian**  
<https://www.experian.com/help/>

1-888-397-3742

*Experian Fraud Alert*  
P.O. Box 9554  
Allen, TX 75013

*Experian Credit Freeze*  
P.O. Box 9554  
Allen, TX 75013

**TransUnion**  
[https://www.transunion.com/  
credit-help](https://www.transunion.com/credit-help)

1-800-916-8800

*TransUnion Fraud Alert*  
P.O. Box 2000  
Chester, PA 19016

*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 your 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](http://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 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 [oag.dc.gov](http://oag.dc.gov).

*For Maryland residents*, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 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](http://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](http://www.ncdoj.gov).

*For Rhode Island residents*, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; [www.riag.ri.gov](http://www.riag.ri.gov); and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. There are approximately 12 Rhode Island residents that may be impacted by this event.