



MULLEN

COUGHLIN
ATTORNEYS AT LAW

RECEIVED

JUL 12 2021

CONSUMER PROTECTION

Angelina W. Freind
Office: (267) 930-4782
Fax: (267) 930-4771
Email: afreind@mullen.law

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

July 7, 2021

VIA U.S. MAIL

Consumer Protection Bureau
Office of the New Hampshire Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Sir or Madam:

We represent Bank of Oak Ridge, located at 2211 Oak Ridge Road, Oak Ridge, North Carolina 27310, and are writing to notify your office of an incident that may affect the privacy of certain personal information relating to three (3) New Hampshire residents. The investigation into this matter is ongoing, and this notice may be supplemented with any new significant facts learned after its submission. By providing this notice, Bank of Oak Ridge does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

Bank of Oak Ridge recently experienced a cybersecurity incident that impacted its computer systems and caused a brief disruption to certain banking services. Bank of Oak Ridge immediately launched an investigation with outside assistance to confirm the nature and scope of the incident. Bank of Oak Ridge also worked to quickly and diligently restore its normal business operations. Through the investigation, Bank of Oak Ridge learned that an unauthorized actor accessed its systems and may have viewed historical data containing certain customer information between April 26 and April 27, 2021. Bank of Oak Ridge conducted a thorough review of the data that was potentially viewed to determine whether it contained any sensitive information. Bank of Oak Ridge recently concluded its review and determined on or around June 11, 2021 that information related to certain customers was included in the potentially impacted data set. After determining the scope of information in the potentially impacted files, Bank of Oak Ridge undertook efforts to locate address information for those who may be affected and provide them with direct notice.

Mullen.law

The information present in the potentially impacted files included the following data related to New Hampshire residents: name, Social Security number, driver's license number, and deposit account number(s).

Notice to New Hampshire Residents

On or about July 7, 2021, Bank of Oak Ridge is providing written notice of this incident to affected individuals, which includes approximately three (3) 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

Bank of Oak Ridge responded immediately to this incident and has been working diligently to provide accurate and complete notices to individuals as soon as possible. Bank of Oak Ridge has taken steps to further enhance and monitor the security of its systems. Bank of Oak Ridge's response to this event also included prompt notification to federal law enforcement authorities and to its banking regulators. As part of its ongoing commitment to the privacy and security of information, Bank of Oak Ridge is reviewing its existing policies and procedures related to data privacy and security. Bank of Oak Ridge is also implementing enhanced employee training protocols to mitigate any risk associated with this incident and to better prevent future incidents. As an added precaution, Bank of Oak Ridge is providing potentially impacted individuals access to complimentary credit monitoring services for one (1) year through Kroll.

Additionally, Bank of Oak Ridge is providing potentially 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. Bank of Oak Ridge is also 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.

2021 JUL 12 PM 1:20
STATE OF NH
DEPT OF JUSTICE

Office of the New Hampshire Attorney General
July 7, 2021
Page 3

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4782.

Very truly yours,

A handwritten signature in black ink, appearing to read 'AF', followed by a horizontal line and a vertical line to the right, indicating a signature block.

Angelina W. Freind of
MULLEN COUGHLIN LLC

AWF/eyl

EXHIBIT A



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

Notice of <<b2b_text_1 (Notice Description)>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

We would like to inform you about 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? We recently experienced a cybersecurity incident that impacted our computer systems and caused a brief disruption to certain banking services. We immediately launched an investigation with outside assistance to confirm the nature and scope of the incident. We also worked to quickly and diligently restore our normal business operations. Through the investigation, we learned that an unauthorized actor accessed our systems and may have viewed historical data containing certain customer information between April 26 and April 27, 2021. We conducted a thorough review of the data that was potentially viewed to determine whether it contained any sensitive information. We recently concluded our review and determined on or around June 11, 2021 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 and provide this direct notice.

What Information Was Involved? The information present in the potentially impacted files included your <<b2b_text_2 (Name)>>. We note that these files contained historical data only and related to certain accounts opened on or before September 30, 2009. Accounts opened after that date were not impacted. We further note that we are not aware of any misuse of your information as a result of this incident. We are providing this notice out of an abundance of caution.

What We Are Doing. We treat our duty to safeguard the information entrusted to us as an utmost priority. We responded immediately to this incident and have been working diligently to provide you with an accurate and complete notice of the incident as soon as possible. We have taken steps to further enhance and monitor the security of our systems. Our response to this event also included prompt notification to federal law enforcement authorities and to our banking regulators. As part of our ongoing commitment to the privacy and security of information in our care, we are reviewing our existing policies and procedures related to data privacy and security. We are also implementing enhanced employee training protocols to mitigate any risk associated with this incident and to better prevent future incidents.

As an added precaution, we are also providing you with 12 months of complimentary access to identity monitoring services through Kroll, as well as guidance on how to better protect your information. Although we are covering the cost of these services, due to privacy restrictions, you will need to complete the activation process yourself using the activation instructions included in the enclosure to this letter.

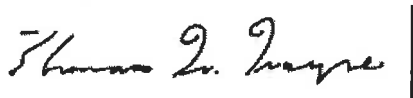
What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. You can find out more about how to better protect against the potential misuse of information in the enclosed *Steps You Can Take to Help Protect Information*. There, you will also find more information about the identity monitoring services we are offering and how to activate.

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 (855) 528-1461, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time, excluding U.S. holidays. You may also write to us directly at:

Bank of Oak Ridge
P.O. Box 2
Oak Ridge, NC 27310

We apologize for any inconvenience this incident may cause you. Please reach out if you have any additional questions.

Sincerely,



Chief Executive Officer and Chief Financial Officer
Bank of Oak Ridge

STEPS YOU CAN TAKE TO HELP PROTECT INFORMATION

Activate Complimentary Identity Monitoring

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

*You have until **October 4, 2021** to activate your identity monitoring services.*

Membership Number: <<Membership Number s_n>>

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 your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your 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 you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one 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 your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a security freeze, you will need to provide 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, military identification, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a fraud alert or credit freeze, 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	833-395-6938
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

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 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. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your 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: 441 4th St. NW #1100 Washington, D.C. 20001; 202-727-3400; and oag@dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us.

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; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are [#] Rhode Island residents impacted by this incident.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your 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 your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You 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 you to review your 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/>.

KROLL

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Web Watcher

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

Public Persona

Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you will receive an alert.

Quick Cash Scan

Quick Cash Scan monitors short-term and cash-advance loan sources. You will receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.

\$1 Million Identity Fraud Loss Reimbursement

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.