



Capital One Services, LLC
P.O. Box 30285
Salt Lake City, UT 84130-0285
capitalone.com

May 26, 2023

Consumer Protection and Antitrust Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Case No.

Dear Attorney General Formella:

I am writing to notify you of a recent security incident at NCB Management Services, Inc. ("NCB") that impacted Capital One credit card information for fifty-three (53) New Hampshire residents. NCB is a national accounts receivable company that provides certain account services to financial institutions.

On February 4, 2023, NCB discovered that an unauthorized third party gained access to NCB's systems on February 1, 2023. In April 2023, following a thorough investigation, NCB informed Capital One that some of the information accessed by the unauthorized third party related to a set of credit card accounts that Capital One currently or previously owned.

The information accessed as part of NCB's security incident included the first and last name of the impacted New Hampshire residents and one or more of the following pieces of information:

. According to NCB, it has notified and is cooperating with federal law enforcement authorities. NCB has reported to us that it has no information to suggest that personal information was misused as a result of this incident.

A notice has been sent to the fifty-three (53) New Hampshire residents referenced above for which we are the credit card account owner and servicer, informing them that their personal information was compromised as a result of this event. As stated in that notice, NCB has secured the services of Kroll to provide two (2) years of free identity monitoring services, which includes credit monitoring, \$1 million identity fraud loss reimbursement, fraud consultation, and identity theft restoration. In addition, the customer notice contains information about steps that customers can take to reduce the possibility of becoming a victim of fraud. Redacted copies of the notices sent to the impacted New Hampshire residents are attached here.



Capital One Services, LLC
P.O. Box 30285
Salt Lake City, UT 84130-0285
capitalone.com

If you have any questions, comments or concerns, please contact me at

Sincerely,

Adam J. Cohen
Associate General Counsel
Capital One

NCB Management Services

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Re: Notice of Data Breach, DSE#

Dear [REDACTED]

We are writing to you about a recent security incident at NCB Management Services, Inc. (“NCB”). NCB is a national accounts receivable management company that financial institutions hire to provide account services, such as credit card account servicing.

Recently, confidential account information maintained by NCB was accessed by an unauthorized third party. You are receiving this notice because we determined that records related to a CLUB credit card account (formerly issued by World’s Foremost Bank) in your name were among those that were accessed without authorization. NCB is not aware of any misuse of your information as a result of this incident. However, in support of you and your information security, you are being notified and provided tools you can use to protect against possible identity theft or fraud.

WHAT HAPPENED: On February 4, 2023, NCB discovered that an unauthorized third party gained access to NCB’s systems on February 1, 2023. In April 2023, after a thorough investigation, NCB confirmed that some of your information was accessed by the unauthorized party.

WHAT INFORMATION WAS INVOLVED: The information accessed in this NCB incident related to the credit card account mentioned above and included your first and last name, and one or more of the following pieces of information:

. As stated above, NCB is not aware of any misuse of your information as a result of this incident.

WHAT NCB IS DOING: After detecting unusual activity, NCB took immediate steps to identify and contain the intrusion. NCB has implemented a number of additional security measures to harden our network and increase our ability to monitor and detect any threats. NCB is also conducting additional training of our workforce on data security. NCB has notified and is cooperating with federal law enforcement authorities, and NCB is notifying you so you can protect your personal and account information.

NCB Management Services

NCB has secured the services of Kroll to provide identity monitoring at no cost to you for two years. 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, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit _____ to activate and take advantage of your identity monitoring services.

You must activate your identity monitoring services by _____
. Your Activation Code will not work after this date.

Provide Your Activation Code: _____ and Your Verification ID: _____

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

Additional information describing the identity monitoring services is included with this letter. Please note that you must enroll to take advantage of this free service and NCB encourages you to do so.

WHAT YOU CAN DO: In addition to enrolling in the complimentary services offered, NCB recommends you review your credit reports and account statements over the next 12 to 24 months and notify your financial institution of any unauthorized transactions or incidents of suspected identity theft. Refer to the enclosed “Important Additional Information” for other precautions you can take.

FOR MORE INFORMATION: Although this incident occurred at NCB, Capital One currently services this credit card program. If you have questions or concerns, you may contact them at _____ (Monday – Friday between 8am and 9pm Eastern Time, excluding major US holidays) for assistance during this process.

We regret the concern or inconvenience this incident may cause you.

Sincerely,

NCB

ENC: Important Additional Information

NCB Management Services

Important Additional Information

For residents of Iowa: You are advised to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon: You are advised to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of New Mexico: You are advised to review personal account statements and credit reports, as applicable, to detect errors resulting from the security incident. You have rights pursuant to the federal Fair Credit Reporting Act. Please visit https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf or see the contact information for the Federal Trade Commission listed below.

For residents of District of Columbia, Maryland, North Carolina, and Rhode Island:

You can obtain information from the District of Columbia, Maryland, North Carolina, and Rhode Island Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

DC Attorney General
400 6th Street NW
Washington, D.C. 20001
1-202-727-3400
www.oag.dc.gov

**Maryland Office of
Attorney General**
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
www.marylandattorneygeneral.gov

**North Carolina Attorney
General**
9001 Mail Service Ctr
Raleigh, NC 27699
1-877-566-7226
www.ncdoj.gov

**Rhode Island Office of
Attorney General**
150 South Main Street
Providence RI 02903
1-401-274-4400
www.riag.ri.gov

For residents of Massachusetts and Rhode Island: You have the right to file or obtain a police report if you are a victim of identity theft. There were 16 Rhode Island residents notified in this incident.

For Residents of New York: You may contact the Federal Trade Commission, the New York Attorney General or the State Department Division of Consumer Protection about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

New York Attorney General
120 Broadway
3rd Floor
New York, NY 10271
800-771-7755
www.ag.ny.gov

**New York State Department Division of Consumer
Protection**
One Commerce Plaza
99 Washington Ave
Albany, NY 12231-0001
800-697-1220
<https://dos.ny.gov/consumer-protection>

For residents of all states:

It is recommended that you remain vigilant for incidents of fraud and identity theft by reviewing payment card account statements and monitoring your credit reports for unauthorized activity. You may obtain a copy of your credit report, for free, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with Equifax ([https://assets.equifax.com/assets/personal/Fraud Alert Request Form.pdf](https://assets.equifax.com/assets/personal/Fraud%20Alert%20Request%20Form.pdf)), Experian (<https://www.experian.com/fraud/center.html>), or Transunion (<https://www.transunion.com/fraud-victim-resource/place-fraud-alert>). A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. Initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your

NCB Management Services

credit report, you need to make a request to each consumer reporting agency by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze for yourself or your spouse or a minor under 16: (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; (5) Proof of current address, such as current utility or telephone bill, bank, or insurance statement; (6) legible photocopy of government-issued identification card (state driver's license or ID card, military identification, etc.); and (7) if you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. It is free to place, lift, or remove a security freeze. However, fees may apply to other services offered by the consumer reporting agencies.

Equifax Security Freeze

P.O. Box 105788

Atlanta, GA 30348-5788

<https://www.equifax.com/personal/credit-report-services/>

(888) 298-0045

Experian Security Freeze

P.O. Box 9554

Allen, TX 75013-9544

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

888-397-3742

TransUnion Security Freeze

P.O. Box 160

Woodlyn, PA 19014

<https://www.transunion.com/credit-help>

800-916-8800

You may also contact the Federal Trade Commission for more information about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Federal Trade Commission, Consumer Response Center

600 Pennsylvania Ave, NW Washington, DC 20580

1-877-IDTHEFT (438-4338) www.identitytheft.gov

NCB Management Services

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Re: Notice of Data Breach, DSE#

Dear [REDACTED]

We are writing to you about a recent security incident at NCB Management Services, Inc. (“NCB”). NCB is a national accounts receivable management company that financial institutions hire to provide account services, such as credit card account servicing.

Recently, confidential account information maintained by NCB was accessed by an unauthorized third party. You are receiving this notice because we determined that records related to a Capital One credit card account in your name were among those that were accessed without authorization. NCB is not aware of any misuse of your information as a result of this incident. However, in support of you and your information security, you are being notified and provided tools you can use to protect against possible identity theft or fraud.

WHAT HAPPENED: On February 4, 2023, NCB discovered that an unauthorized third party gained access to NCB’s systems on February 1, 2023. In April 2023, after a thorough investigation, NCB confirmed that some of your information was accessed by the unauthorized party.

WHAT INFORMATION WAS INVOLVED: The information accessed in this NCB incident related to the credit card account mentioned above and included your first and last name, and one or more of the following pieces of information:

. As stated above, NCB is not aware of any misuse of your information as a result of this incident.

WHAT NCB IS DOING: After detecting unusual activity, NCB took immediate steps to identify and contain the intrusion. NCB has implemented a number of additional security measures to harden our network and increase our ability to monitor and detect any threats. NCB is also conducting additional training of our workforce on data security. NCB has notified and is cooperating with federal law enforcement authorities, and NCB is notifying you so you can protect your personal and account information.

NCB has secured the services of Kroll to provide identity monitoring at no cost to you for two years. 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

NCB Management Services

identity monitoring services include Credit Monitoring, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit **Enroll.krollmonitoring.com/redeem** to activate and take advantage of your identity monitoring services.

You must activate your identity monitoring services by [REDACTED]
[REDACTED]. Your Activation Code will not work after this date.

Provide Your Activation Code: [REDACTED] and Your Verification ID:
[REDACTED]

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

Additional information describing your services is included with this letter. Please note that you must enroll to take advantage of this free service and NCB encourages you to do so.

WHAT YOU CAN DO: In addition to enrolling in the complimentary services offered, NCB recommends you review your credit reports and account statements over the next 12 to 24 months and notify your financial institution of any unauthorized transactions or incidents of suspected identity theft. Refer to the enclosed “Important Additional Information” for other precautions you can take.

FOR MORE INFORMATION: Although this incident occurred at NCB, please contact Capital One at 800-984-7397 (Monday – Friday between 8am and 9pm Eastern Time, excluding major US holidays) if you have questions or concerns.

We regret the concern or inconvenience this incident may cause you.

Sincerely,

NCB

ENC: Important Additional Information

NCB Management Services

Important Additional Information

For residents of Iowa: You are advised to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon: You are advised to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of New Mexico: You are advised to review personal account statements and credit reports, as applicable, to detect errors resulting from the security incident. You have rights pursuant to the federal Fair Credit Reporting Act. Please visit https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf or see the contact information for the Federal Trade Commission listed below.

For residents of District of Columbia, Maryland, North Carolina, and Rhode Island:

You can obtain information from the District of Columbia, Maryland, North Carolina, and Rhode Island Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

DC Attorney General
400 6th Street NW
Washington, D.C. 20001
1-202-727-3400
www.oag.dc.gov

**Maryland Office of
Attorney General**
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
[www.marylandattorneygen
eral.gov](http://www.marylandattorneygeneral.gov)

**North Carolina Attorney
General**
9001 Mail Service Ctr
Raleigh, NC 27699
1-877-566-7226
www.ncdoj.gov

**Rhode Island Office of
Attorney General**
150 South Main Street
Providence RI 02903
1-401-274-4400
www.riag.ri.gov

For residents of Massachusetts and Rhode Island: You have the right to file or obtain a police report if you are a victim of identity theft. There were 16 Rhode Island residents notified in this incident.

For Residents of New York: You may contact the Federal Trade Commission, the New York Attorney General or the State Department Division of Consumer Protection about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

New York Attorney General
120 Broadway
3rd Floor
New York, NY 10271
800-771-7755
www.ag.ny.gov

**New York State Department Division of Consumer
Protection**
One Commerce Plaza
99 Washington Ave
Albany, NY 12231-0001
800-697-1220
<https://dos.ny.gov/consumer-protection>

For residents of all states:

It is recommended that you remain vigilant for incidents of fraud and identity theft by reviewing payment card account statements and monitoring your credit reports for unauthorized activity. You may obtain a copy of your credit report, for free, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf), Experian (<https://www.experian.com/fraud/center.html>), or Transunion (<https://www.transunion.com/fraud-victim-resource/place-fraud-alert>). A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. Initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when

NCB Management Services

requesting a security freeze for yourself or your spouse or a minor under 16: (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; (5) Proof of current address, such as current utility or telephone bill, bank, or insurance statement; (6) legible photocopy of government-issued identification card (state driver's license or ID card, military identification, etc.); and (7) if you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. It is free to place, lift, or remove a security freeze. However, fees may apply to other services offered by the consumer reporting agencies.

Equifax Security Freeze

P.O. Box 105788

Atlanta, GA 30348-5788

<https://www.equifax.com/personal/credit-report-services/>

(888) 298-0045

Experian Security Freeze

P.O. Box 9554

Allen, TX 75013-9544

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

888-397-3742

TransUnion Security Freeze

P.O. Box 160

Woodlyn, PA 19014

<https://www.transunion.com/credit-help>

800-916-8800

You may also contact the Federal Trade Commission for more information about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Federal Trade Commission, Consumer Response Center

600 Pennsylvania Ave, NW Washington, DC 20580

1-877-IDTHEFT (438-4338) www.identitytheft.gov