

April 14, 2020

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VIA EMAIL ONLY

Attorney General Wayne Stenehjem
Office of the North Dakota Attorney General
Consumer Protection and Antitrust Division
1050 E. Interstate Avenue, Suite 200
Bismarck, ND 58503-5574
ndag@nd.gov

Re: Data Security Incident

Dear Attorney General Stenehjem:

We represent Cortex Systems, LLC with respect to a potential data security incident described in more detail below. Cortex Systems takes the security and privacy of the information in its control very seriously, and has taken steps to prevent a similar incident from occurring in the future.

1. Nature of the security incident.

On February 4, 2020, Cortex Systems discovered that its customer database may have been accessible by unknown individuals. Cortex Systems immediately took action, removing the security lapse that caused the database to be accessible, and conducted an investigation to determine what, if any, information was risk of compromised. On March 3, 2020, Cortex ultimately determined that customer information, specifically unencrypted dates of birth, was potentially accessible. All other personal information, including customers' Social Security numbers, was encrypted and unreadable to the threat actor. We have no evidence of misuse of anyone's information.

2. Number of North Dakota residents affected.

A total of one thousand ninety hundred thirty-eight (1,938) residents of North Dakota may have been potentially affected by this incident. Notification letters were mailed on April 14, 2020, by first class mail. A sample copy of the notification letter is included with this letter.

55 West Monroe Street, Suite 3800 • Chicago, IL 60603 • p 312.704.0550 • f 312.704.1522

Alabama • Albany • Atlanta • Austin • Baltimore • Beaumont • Boston • Chicago • Dallas • Denver • Edwardsville • Garden City • Hartford • Houston
Indiana • Kentucky • Las Vegas • London • Los Angeles • Miami • Michigan • Milwaukee • Mississippi • Missouri • Nashville • New Jersey • New Orleans
New York • Orlando • Philadelphia • Phoenix • San Diego • San Francisco • Sarasota • Stamford • Virginia • Washington, DC • Wellington • White Plains

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3. Steps taken.

Cortex Systems takes the security and privacy of the information in its control very seriously, and has taken steps to prevent a similar event from occurring in the future, as well as to protect the privacy and security of potentially impacted individuals' information. This includes engaging an independent cyber security firm to ensure the initial security lapse was corrected and conducting ongoing security and vulnerability assessments. Cortex Systems is also providing potentially impacted individuals with identity theft protection and credit monitoring services for a period of twelve (12) months, at its own expense, through Kroll.

4. Contact information.

Cortex Systems remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at Anjali.Das@wilsonelser.com or (312) 821-6164.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP



Anjali C. Das

Enclosure



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

<<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

Dear <<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>,

We are writing to inform you of a data security incident involving Cortex Systems, LLC that may have resulted in unauthorized access to some of your personal information. We take the privacy and protection of your personal information very seriously. Your trust is a top priority at Cortex Systems, and we deeply regret any inconvenience this may cause. This letter contains information about what happened, steps we have taken and resources we are making available to you to help safeguard your identity.

On February 4, 2020, we discovered that our customer database may have been accessible by unknown individuals. We immediately took action, removing the security lapse that caused the database to be accessible, and conducted an investigation to determine what, if any, information was at risk of compromise. We determined that certain of your personal information, specifically your name and date of birth, was potentially accessible. All other sensitive information, including Social Security number, was encrypted and unreadable to the unknown individuals. We have no evidence of misuse of anyone's information.

In an abundance of caution, 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, Fraud Consultation, and Identity Theft Restoration.

Visit [https://\[IDMonitoringURL\]](https://[IDMonitoringURL]) to activate and take advantage of your identity monitoring services.

You have until [\[Date\]](#) to activate your identity monitoring services.

Membership Number: <<Member ID>>

To receive credit services by mail instead of online, please call 1-844-263-8605. Additional information describing your services is included with this letter.

We take the security of all information in our systems very seriously and want to assure you that we are taking steps to prevent a similar event from occurring in the future. Those steps include engaging an independent cyber security firm to ensure the initial issue was corrected, and to provide ongoing assessments to prevent anything like this from happening in the future.

We sincerely regret any inconvenience that this matter may cause you, and remain dedicated to protecting your information. Please see the addendum for additional steps you can take to help safeguard your personal information. If you have any questions, please call 1-???-???-????, Monday through Friday, 7:00 a.m. to 4:30 p.m., Mountain Time.

Sincerely,

A handwritten signature in black ink that reads "Steve Smith".

Steve Smith
Chief Information Officer
Cortex Systems, LLC

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services¹ 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 can help you determine if it's an indicator of identity theft.

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 can dig deep to uncover the scope of the identity theft, and then work to resolve it.

¹ 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.

Additional Important Information

For residents of Hawaii, Michigan, Missouri, Virginia, Vermont, and North Carolina: It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

For residents of Illinois, Iowa, Maryland, Missouri, North Carolina, Oregon, and West Virginia: It is required by state laws to inform you that you may obtain a copy of your credit report, free of charge, 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.

For residents of Iowa:

State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon:

State laws advise you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission

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

Maryland Office of the Attorney General Consumer Protection Division 200, St. Paul Place Baltimore, MD 21202 1-888-743-0023
www.oag.state.md.us

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

North Carolina Office of the Attorney General Consumer Protection Division, 9001 Mail Service Center Raleigh, NC 27699-9001
1-877-566-7226 www.ncdoj.com

Federal Trade Commission Consumer Response Center, 600 Pennsylvania Ave, NW Washington, DC 20580 1-877-IDTHEFT
(438-4338) www.ftc.gov/idtheft

New York Office of Attorney General Consumer Frauds & Protection, The Capitol Albany, NY 12224 1-800-771-7755 <https://ag.ny.gov/consumer-frauds/identity-theft>

For residents of Massachusetts: It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft.

For residents of all states:

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); TransUnion (<https://www.transunion.com/fraud-alerts>); or Experian (<https://www.experian.com/fraud/center.html>). 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. As of September 21, 2018, 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. You may make that request 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 (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (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; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze

P.O. Box 105788
Atlanta, GA 30348-5788
www.equifax.com/personal/credit-report-services/credit-freeze/
800-525-6285

Experian Security Freeze

P.O. Box 9554
Allen, TX 75013-9544
www.experian.com/freeze/
888-397-3742

TransUnion (FVAD)

P.O. Box 2000
Chester, PA 19022
freeze.transunion.com
800-680-7289

More information can also be obtained by contacting the Federal Trade Commission listed above.