



MULLEN
COUGHLIN_{LLC}
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January 14, 2022

VIA E-MAIL

Office of the Attorney General
Consumer Protection and Antitrust
Gateway Professional Center
1050 E Interstate Avenue Suite 200
Bismarck, ND 58503-5574
E-mail: ndag@nd.gov

Re: Notice of Data Event

Dear Sir or Madam:

We represent Vantage Holding Company, LLC (“Vantage”) located at 1305 S Main Street, Meadville, Pennsylvania 16335, and are writing to notify your office of an incident that may affect the security of some personal information relating to one (1) North Dakota resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Vantage does not waive any rights or defenses regarding the applicability of North Dakota law, the applicability of the North Dakota data event notification statute, or personal jurisdiction.

Nature of the Data Event

On October 17, 2021, Vantage learned of suspicious activity occurring within certain computer systems. Vantage immediately launched an investigation to determine the nature and scope of the incident. On November 18, 2021, the investigation indicated that certain Vantage systems were accessed on October 17, 2021, and that limited data, which may have included personal information, was taken by an unknown actor. Therefore, out of an abundance of caution, Vantage began a review of the contents of the impacted data in order to determine the types of protected information present at the time of the incident and to whom the information relates. As Vantage identifies impacted individuals, it is reviewing its internal files to ascertain address information for individuals in which it had a direct relationship and to identify clients to whom the information belonged.

While the information that could be at risk varies for each individual, the information related to the North Dakota resident that Vantage identified includes the resident’s name, address, date of birth, and Social Security number.

Notice to North Dakota Resident

On January 14, 2022, Vantage began providing written notice of this incident to affected individuals, which includes one (1) North Dakota resident. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*. Vantage is also notifying impacted clients and requesting that these clients provide address information for their impacted population. Notification to impacted individuals is ongoing as the investigation continues and as information is provided by clients. As a result, Vantage may supplement this notification if it is determined that a significant amount of additional North Dakota residents will receive notice. In the meantime, Vantage has placed a notice about this incident on its website.

Other Steps Taken and To Be Taken

Upon discovering the event, Vantage moved quickly to investigate and respond to the incident, assess the security of Vantage systems, and notify potentially affected individuals. Vantage is also working to implement additional safeguards and training to its employees. Vantage also reported the incident to law enforcement and will cooperate with any investigation. Vantage is providing access to credit monitoring services for one (1) year, through Equifax, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Vantage 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. Vantage is 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-1613.

Very truly yours,



Katie Butler of
MULLEN COUGHLIN LLC

KLB/kml
Enclosure

EXHIBIT A



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>> <<Date>>

NOTICE OF SECURITY INCIDENT

Dear <<Name 1>>:

Vantage Holding Company, LLC (“Vantage”) is writing to make you aware of a recent incident that may impact the security of some of your information. While we are unaware of any actual or attempted misuse of your information, we are providing you with information about the incident, our response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it appropriate to do so.

What Happened? On October 17, 2021, Vantage learned of suspicious activity occurring within certain computer systems. We immediately launched an investigation to determine the nature and scope of the incident. On November 18, 2021, the investigation indicated that certain Vantage systems were accessed on October 17, 2021, and that limited data, which may have included personal information, was taken by an unknown actor.

What Information Was Involved? We recently determined that your name, address, date of birth, and Social Security number were potentially viewed or taken from our network by the unknown actor. To date, we have no indication that your information has been subject to actual or attempted misuse in relation to this incident.

What We Are Doing. We take this incident and the security of information within our care very seriously at Vantage. Upon becoming aware of this incident, we immediately launched an in-depth investigation to determine the nature and scope of the incident. As part of our ongoing commitment to information security, we are reviewing our existing policies and procedures regarding data privacy and are evaluating additional measures and safeguards to protect against this type of the incident in the future. In addition to notifying you, we will also be notifying state and federal regulators, as required.

As an added precaution, we are also offering <<twelve/twenty-four>> months of credit monitoring services in Equifax® Credit Watch™ Gold.

What You Can Do. You can find out more about how to protect against potential identity theft and fraud in the enclosed *Steps You Can Take to Protect Personal Information*. There you will also find more information on the credit monitoring services we are offering and how to enroll.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please contact call the dedicated assistance line that we have set up to help at 855-604-1764 Monday through Friday, 9:00 a.m. to 9:00 p.m. Eastern Time.

Vantage sincerely regrets any inconvenience or concern this incident may have caused you.

Sincerely,

Gerald P. Alonge
Chief Executive Officer
Vantage Holding Company, LLC

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring and Identity Restoration Services



Enter your Activation Code: <ACTIVATION CODE>
Enrollment Deadline: <ENROLLMENT DEADLINE>

Equifax Credit Watch™ Gold

*Note: You must be over age 18 with a credit file to take advantage of the product

Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications¹ when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts², which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock³
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁴

Enrollment Instructions

Go to www.equifax.com/activate

Enter your unique Activation Code of <ACTIVATION CODE> then click “Submit” and follow these 4 steps:

1. **Register:**
Complete the form with your contact information and click “Continue”.
*If you already have a myEquifax account, click the ‘Sign in here’ link under the “Let’s get started” header.
Once you have successfully signed in, you will skip to the Checkout Page in Step 4*
 2. **Create Account:**
Enter your email address, create a password, and accept the terms of use.
 3. **Verify Identity:**
To enroll in your product, we will ask you to complete our identity verification process.
 4. **Checkout:**
Upon successful verification of your identity, you will see the Checkout Page.
Click ‘Sign Me Up’ to finish enrolling.
- You’re done!**
The confirmation page shows your completed enrollment.
Click “View My Product” to access the product features.

¹ WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers’ personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers’ personal information is at risk of being traded.

² The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

³ Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer’s identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com

⁴ The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

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, 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 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
1-888-298-0045	1-888-397-3742	1-833-395-6938
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 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. Vantage Holding Company, LLC is located at 1305 S Main St, Meadville, Pennsylvania 16335.

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.