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May 20, 2021

Privileged and Confidential

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

Re: Security Breach Notification

Dear Attorney General Stenehjem,

We are writing on behalf of our client, Intermountain Farmers Association ("IFA") (located at 1147 W 2100 S, Salt Lake City, UT 84119), to notify you of a security breach incident involving two (2) North Dakota residents.[1]

Nature

On April 8, 2021, IFA discovered that they were the victim of a sophisticated ransomware attack that resulted in unauthorized access to their network. At that time, IFA took immediate steps to stop the threat and understand the full scope of the situation. This included hiring third-party forensic experts to conduct a thorough investigation, remediation efforts, and contacting the FBI to seek assistance with the incident. Further, the attack encrypted all of IFA's servers and systems, which prevented them from restoring their operations and accessing their data and information for an extended period of time.

On May 8, 2021, IFA restored portions of its systems, allowing it to access some of its data and information of its employees and customers.

[1] By providing this notice, IRA 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.

Due to the nature and scope of the attack, IFA's remediation efforts and investigation are ongoing (including attempting to fully restore its operations and systems), but currently, IFA has no evidence indicating misuse of its data or information. However, out of an abundance of caution, and due to IFA having personal information including social security numbers, IFA decided to provide notifications to potentially impacted individuals proactively.

Notice and IFA's Response to the Event

On May 21, 2021, IFA will mail written notifications to the potentially affected North Dakota residents, in accordance with N.D. Cent. Code § 51-30-01, in a substantially similar form as the enclosed letter (attached as Exhibit A).

Additionally, IFA is providing these potentially impacted individuals the following:

- Free access to credit monitoring services for at least twelve months (12), through Sontiq;
- Guidance on ways to protect against identity theft and fraud, including steps to report any suspected activities or events of identity theft or fraud to their credit card company and/or bank.
- The appropriate contact information for the consumer reporting agencies along with information on how to obtain a free credit report and place a fraud alert and security freeze on their credit file;
- 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 and law enforcement to report attempted or actual identity theft and fraud.

Further, IFA provided the notice to the three major credit reporting agencies along with the applicable government regulators, officials, and other Attorney Generals.

Finally, IFA is working to implement any necessary additional safeguards, enhance and improve its policies and procedures related to data protection, improve its cybersecurity infrastructure, and further train its employees on best practices to minimize the likelihood of this type of incident occurring again.

Contact Information

If you have any questions or wish to discuss this event further, please do not hesitate to call me on my direct dial (410) 917-5189 or email me at spollock@wtplaw.com.

Sincerely Yours,

Spencer S. Pollock, Esq., CIPP/US, CIPM

EXHIBIT A

<Name>
<Address>

May 21, 2021

Re: Notice of Data Breach

Dear <Name>

At Intermountain Farmers Association, we value transparency and respect the privacy of your information, which is why, as a precautionary measure, we are writing to let you know about a data security incident that may involve your personal information. As such, we are providing you with background about the incident, what we did in response, and steps you can take to protect yourself against possible misuse of your personal information.

What Happened

On April 8, 2021, we discovered that we were the victim of a sophisticated ransomware attack that resulted in unauthorized access to our network. At that time, we took immediate steps to stop the threat and to understand the full scope of the situation. This included hiring third-party forensic experts to conduct a thorough investigation, remediation efforts, and contacting the FBI to seek assistance with the incident.

As of now, we have no evidence indicating that your information was obtained and or misused, but our initial investigation revealed that the cybercriminal was able to obtain some of the data and information contained on our systems. However, out of an abundance of caution, we wanted to let you know that your information could have been involved in the attack.

What Information Was Involved

The information that could have been involved included your <PII>.

What We Are Doing

The security and privacy of the information contained within our systems is a top priority for us. As stated above, while we have no evidence indicating your information was obtained and or misused, we strongly recommend you remain vigilant, monitor and review all of your financial and account statements, and report any unusual activity to the institution that issued the record and law enforcement.

Additionally, in response to this attack, we implemented additional safeguards and employee training related to cybersecurity. Further, we are working with our external legal and cybersecurity experts to improve our cybersecurity policies, procedures, and protocols to attempt to minimize the likelihood of this type of attack succeeding again.

Also, we are offering a complimentary one-year membership through Cyberscout's Single Bureau Credit Monitoring* services at no charge. Signing up for these services will not impact your credit score. These services provide you with alerts for twelve months 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 occurs with the bureau. Further, we are providing you with proactive fraud assistance to help with any questions that you might have or in the event you become a victim of identity theft, as well as a $1,000,000 insurance reimbursement policy. To safeguard your privacy and security, you will be asked to verify your identity before monitoring can be activated.

To enroll in Credit Monitoring* services at no charge, please log on to https://www.cs2protect.com, click the "Sign Up" button and follow the instructions provided.

When prompted, please provide the following unique code to receive services: <**code**>

Next, click the "Use Now" link on the Monitoring Services tile to verify your identity and activate your monitoring services.

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 an email account, and services may not be available to minors under the age of 18 years of age.

For More Information

We sincerely regret this incident, and we understand that you may have questions about it beyond what is covered in this letter. If you have any additional questions, please call our toll-free helpline response line at 1-800-405-6108 between 8:00 a.m. and 8:00 p.m. (Eastern time)Monday – Friday.

Sincerely yours,

Layne Anderson

Layne Anderson
President, CEO

INTERMOUNTAIN FARMERS ASSOCIATION
CORPORATE OFFICE · 1147 WEST 2100 SOUTH · SALT LAKE CITY, UT 84119 · T 801.972.2122 · F 801.972.2186
MAILING ADDRESS · P.O. BOX 30168 · SALT LAKE CITY, UT 84130 · www.IFA-COOP.com · www.IFACOUNTRYSTORES.com

OTHER IMPORTANT INFORMATION

Obtain and Monitor Your Credit Report

We recommend that you obtain a free copy of your credit report from each of the three nationwide credit reporting agencies once every 12 months by visiting http://www.annualcreditreport.com, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can access the request form at https://www.annualcreditreport.com/requestReport/requestForm.action.

Alternatively, you can elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Provided below are the three nationwide credit reporting agencies' contact information to request a copy of your credit report or general identified above inquiries.

Equifax
(866) 349-5191
www.equifax.com
P.O. Box 740241
Atlanta, GA 30374

Experian
(888) 397-3742
www.experian.com
P.O. Box 4500
Allen, TX 75013

TransUnion
(800) 888-4213
www.transunion.com
2 Baldwin Place
P.O. Box 1000
Chester, PA 19016

Remain Vigilant, Review Your Financial Account Statements and Notify Law Enforcement of Suspicious Activity

As a precautionary measure, we recommend that you remain vigilant by closely reviewing your financial account statements and credit reports. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company that maintains the account. You also should immediately report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, including your state attorney general and the Federal Trade Commission (FTC). Complaints filed with the FTC will be added to the FTC's Identity Theft Data Clearinghouse, a database made available to law enforcement.

To file a complaint or to contact the FTC, you can (1) send a letter to the Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580; (2) go to IdentityTheft.gov/databreach; or (3) call 1-877-ID-THEFT (877-438-4338).

Consider Placing a Fraud Alert on Your Credit Report

You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you before establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three nationwide credit reporting agencies identified above. Additional information is available at https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/

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Security Freeze (also known as a Credit Freeze)

You may have the right to put a credit or security freeze on your credit file. A security freeze makes it harder for someone to open a new account in your name. It is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to apply for a new credit card, wireless phone, or any service that requires a credit check.

You must separately place a security freeze on your credit file with each credit reporting agency. To place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you, including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement, or insurance statement. There is no charge to request a security freeze or to remove a security freeze. Since the instructions for how to establish a security freeze differ based on your state residency, to find out more information, please contact the three nationwide credit reporting agencies (contact information provided above in the **"Obtain and Monitor Your Credit Report"** section).

Take Advantage of Additional Free Resources on Identity Theft

We recommend that you review the tips provided by the Federal Trade Commission's Consumer Information website, a valuable resource with some helpful tips on how to protect your information. Additional information is available at https://www.consumer.ftc.gov/topics/privacy-identity-online-security

For more information, please visit IdentityTheft.gov or call 1-877-ID-THEFT (877-438-4338). A copy of Identity Theft – A Recovery Plan, a comprehensive guide from the FTC to help you guard against and deal with identity theft, can be found on the FTC's website at https://www.consumer.ftc.gov/articles/pdf-0009_identitytheft_a_recovery_plan.pdf

Iowa residents may also wish to contact the Office of the Attorney general on how to avoid identity theft by calling 515-281-5164 or by mailing a letter to the Attorney General at: Office of the Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines, IA 50319. **Maryland residents** may wish to review the information the Attorney General, who can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, or visiting www.oag.state.md.us. **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 agencies 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. For more information about the FCRA, please visit https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf. **North Carolina residents** may wish to review the information provided by the North Carolina Attorney General at https://ncdoj.gov/protecting-consumers/identity-theft/, or by contacting the Attorney General by calling 1-877-566-7226 or emailing or by mailing a letter to the Attorney General at North Carolina Attorney General's Office 9001 Mail Service Center Raleigh, NC 27699.

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