From: Fred Niehaus [mailto:fn@igsolutions.co]
Sent: Wednesday, May 12, 2021 1:57 PM
To: DeLange, Brett <brett.delange@ag.idaho.gov>
Subject: Data Incident

Brett,
I hope all is well with you.
Attorney General Wasden asked me to forward this to you directly.
I wanted you to be aware of this in light of the Company's presence in Idaho. While not a data breach, we are providing these notices to all states.
Should you have any questions, please do not hesitate to contact me directly.

Regards,

Fred Niehaus

From: Raether, Ronald I.
Sent: Monday, May 10, 2021 7:34 PM
To: databreach@coag.gov
Subject: Notice to the Attorney General

To Whom It May Concern:

This firm represents Progrexion ASG, Inc. ("Progrexion") which is located at 257 East 200 South, Salt Lake City, UT 84111. We are writing to provide preliminary notice of a potential incident that was discovered on April 8, 2021. The incident did not involve the type of data that would constitute a breach requiring notice as defined by the Colorado statute. Nonetheless, Progrexion intends to provide notice to these consumers and offer identity theft protection services.

On April 8, 2021, Progrexion discovered search patterns that suggested a malicious third-party was using one of its public facing platforms, Credit Snapshot (the "Incident"). The suspected malicious actor had apparently acquired consumer names, email addresses, Social Security numbers, dates of birth and other identifiers from a source other than Progrexion. The malicious third-party used the information it already had in their possession to circumvent the controls Progrexion had in place to assure that information about a consumer went only to the consumer. The malicious third party could have had access to FICO scores, account numbers and limited tradeline transaction information (such as whether the consumer ever made a late payment). The malicious actor did not have access to any passwords, Social Security numbers (other than the SSNs the malicious user already had), or codes to access any consumer account.

Upon discovering the potential unauthorized use, Progrexion took the web application offline. After adding additional authentication controls, the application was reactivated. Progrexion's investigation of the Incident is on-going. Progrexion will update you if any additional information is uncovered.

While these incidents may not constitute a "security breach" within the meaning of the Colorado statute, we are notifying you out of an abundance of caution. We also intend to notify the sixty-six (66) Colorado residents whose information the malicious user had independent of Progrexion. Progrexion also intends to offer them free identity theft and credit monitoring

services. Should you have any questions or concerns about this matter, please do not hesitate to contact me using the contact information provided below.

Sincerely,

Ronald I. Raether, Jr., CIPP/US
Partner
Direct: 949.622.2722 | Internal: 18-2722
ron.raether@troutman.com

troutman pepper
5 Park Plaza, Suite 1400
Irvine, CA 92614
troutman.com [troutman.com]