



MULLEN  
COUGHLIN<sub>LLC</sub>  
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August 23, 2023

**VIA E-MAIL**

Office of the Idaho Attorney General  
Consumer Protection Division  
P.O. Box 83720  
Boise, ID 83720-0010  
E-mail: [consumer\\_protection@ag.idaho.gov](mailto:consumer_protection@ag.idaho.gov)

**Re: Notice of Data Event**

To Whom It May Concern:

We represent R&B Credit Control Corporation of Virginia d/b/a Credit Control Corporation (“CCC”) located at 11821 Rock Landing Drive, Newport News, VA 23606. CCC provides debt collection services to other entities. As part of these services, CCC collects information on behalf of its business entity customers (“Data Owners”). CCC experienced a data event and is providing notice of this event on behalf of the potentially impacted Data Owners. For a list of the relevant Data Owner(s), please see *Exhibit A*. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, CCC does not waive any rights or defenses regarding the applicability of Idaho law, the applicability of the Idaho data event notification statute, or personal jurisdiction.

**Nature of the Data Event**

On March 7, 2023, CCC became aware of unusual activity involving certain systems within its network. CCC promptly isolated the systems, and, with the assistance of third-party forensic specialists, commenced a comprehensive investigation into the nature and scope of the activity. On or about March 14, 2023, the investigation determined that certain files were copied from the CCC network as part of a cyber incident that occurred between March 2, 2023 and March 7, 2023. CCC undertook an extensive and thorough review of the files in order to identify what specific information was present in the files and to whom it related. CCC completed the initial review of the files on May 3, 2023. Although the information varies by individual, the review determined that certain files contained personal information as defined by Idaho law such as name and Social Security number. On May 4, 2023, CCC began notifying the Data Owner(s) that are associated with the subject individuals. Although CCC’s review efforts remained ongoing, on May 14, 2023, CCC began notifying additional Data Owner(s) associated with the subject individuals.

### **Notice to Idaho Residents**

On August 23, 2023, CCC began providing written notice of the event on behalf of relevant Data Owner(s) to four hundred eighty-seven (487) residents pursuant to Idaho law. Written notice is being provided in substantially the same form as the letter attached here as **Exhibit B**. Additionally, CCC notified relevant media outlets and published notice of the event on its website at [www.creditcontrol.net](http://www.creditcontrol.net).

### **Other Steps Taken and To Be Taken**

Upon discovering the event, CCC moved quickly to investigate and respond to the event, assess the security of CCC systems, and identify potentially affected individuals. Further, CCC notified federal law enforcement regarding the event and has cooperated with law enforcement's requests for information. CCC has a process in place to ensure regular and timely review and where necessary the updating of existing policies and procedures related to data protection and security. CCC has also implemented additional security measures as appropriate to further secure the information in its systems and is increasing the frequency of employee training on topics including the importance of safeguarding data.

CCC is providing potentially impacted individuals with an opportunity to enroll in complimentary credit monitoring and identity protection services. Additionally, CCC is providing individuals with guidance on how to better protect against identity theft and fraud. The individual notice also provides 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.

CCC notified relevant Data Owners of the event. CCC is providing notice to State and federal regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion. CCC is also notifying the U.S. Department of Health and Human Services and prominent media pursuant to the Health Insurance Portability and Accountability Act (HIPAA).

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-2190.

Very truly yours,



Kevin M. Mekler of  
MULLEN COUGHLIN LLC

KMK/klh  
Enclosure

# **EXHIBIT A**

## **Data Owners**

- Zply Fiber - 487

# **EXHIBIT B**



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

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country>>

<<b2b\_text\_1(subject header)>>

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>,

R&B Corporation of Virginia d/b/a Credit Control Corporation (“CCC”) provides debt collection services to other entities. CCC is writing on behalf of entities including <<b2b\_text\_3(covered entity)>> to inform you of a recent event at CCC. We are providing you with information about the event, our response, and steps you may take, should you feel it is appropriate to do so.

**What Happened?** On March 7, 2023, CCC became aware of unusual activity involving certain systems within our network. We promptly isolated the systems, and, with the assistance of third-party forensic specialists, commenced a comprehensive investigation into the nature and scope of the activity. On or about March 14, 2023, the investigation determined that certain files were copied from our network as part of a data security incident that occurred between March 2, 2023, and March 7, 2023. We undertook a thorough review of the files in order to identify what specific information was present in the files and to whom it related. On May 4, 2023, we began notifying our business partners and worked with them to provide this notice. We do not have evidence that your information was copied but we cannot rule out this possibility and are providing you with this notice.

**What Information Was Involved?** The following types of information associated with you may have been present in the involved files: account holder <<b2b\_text\_2(name, data elements)>>.

**What We Are Doing.** We take this event and the security of information in our care seriously. As part of our ongoing commitment to the security of information, we have a process in place to ensure regular and timely review and, where necessary, updating of our existing policies and procedures related to data protection and security. We have also implemented additional security measures as appropriate to further secure the information in our systems and we are increasing the frequency of our employee training on topics including the importance of safeguarding data.

Upon learning of the unusual activity, we moved quickly to investigate and respond. The investigation included confirming the security of CCC’s network, reviewing the relevant files, notifying potentially affected business partners, and notifying federal law enforcement. We are also notifying individuals on behalf of our business partners and providing these individuals with an opportunity to enroll in complimentary credit monitoring and identity protection services.

**What You Can Do.** We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity. You may also review the information contained in the attached *Steps You Can Take to Protect Personal Information* section of this letter. Further, you may enroll in the complimentary credit monitoring and identity protection services we are offering to you for 1 year through Kroll. Although we are making these services available to you, we are unable to enroll you directly. If you would like to enroll yourself in these services, you will need to follow the attached instructions.

**For More Information.** If you have additional questions, please contact our dedicated assistance line at (866) 347-3197, Monday through Friday from 9:00 a.m. to 6:30 p.m. EST (excluding major U.S. holidays). You may also write to Credit Control Corporation, attention: Privacy Dept., 11821 Rock Landing Drive, Newport News, VA 23606 or visit our website at [www.creditcontrol.net](http://www.creditcontrol.net).

Sincerely,

Credit Control Corporation

## STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

### **Enroll in Monitoring Services**

To help relieve concerns and restore confidence following this incident, 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://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b\_text\_6(activation deadline)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s\_n>>

For more information about Kroll and your Identity Monitoring services, you can visit [info.krollmonitoring.com](http://info.krollmonitoring.com). Additional information describing your services is included with this letter.



### **TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES**

You have been provided with access to the following services 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 will be able to help you determine if it is 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 will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

\* 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.

### **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 a free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any 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 a consumer's name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of 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 they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/help/">https://www.experian.com/help/</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
1-888-298-0045	1-888-397-3742	1-800-916-8800
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**

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580; [www.identitytheft.gov](http://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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state Attorney General. This notice has not been delayed by law enforcement.

*For District of Columbia residents*, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; 202-727-3400; and [oag.dc.gov](http://oag.dc.gov).

*For Maryland residents*, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

*For New Mexico residents*, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active-duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage consumers to review their rights pursuant to the Fair Credit Reporting Act by visiting [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf), or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

*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](http://www.ncdoj.gov).

*For Rhode Island residents*, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; [www.riag.ri.gov](http://www.riag.ri.gov); and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. **There are approximately # Rhode Island residents that may be impacted by this event.**