POLSINELLI

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August 30, 2023

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VIA E-MAIL (OCP@DCCA.HAWAII.GOV)
Attorney General Anne E. Lopez
Department of Commerce and Consumer Affairs
State of Hawaii Office of Consumer Protection
Leiopapa A. Kamehameha Building
235 South Beretania Street, Suite 801
Honolulu, Hawaii 96813

Re: Notification of a Data Security Incident

Dear Attorney General Lopez:

We represent Aloha Pacific Federal Credit Union ("APFCU"), which has a mailing address of 3465 Waialae Ave., Ste. 400, Honolulu, HI 96816, in connection with a recent vendor caused data incident that impacted APFCU members. APFCU is reporting this incident pursuant to HAW. REV. STAT. § 487N-2(f). This notice will be supplemented, if necessary, with any new significant facts discovered subsequent to its submission. While APFCU is notifying you of this incident, APFCU does not waive any rights or defenses relating to the incident or this notice.

NATURE OF THE INCIDENT

On May 31, 2023, Progress Software announced that a previously unknown vulnerability in its MOVEit secure file transfer tool was exploited by unauthorized third parties. Thousands of companies, including one of APFCU's business partners, Darling Consulting Group ("DCG"), used this file transfer tool to securely transfer data files. Upon notification from Progress Software, APFCU understands that DCG immediately suspended its use of the MOVEit Transfer tool and it remained disabled until DCG received and implemented a software patch to remediate the issue. APFCU understands that DCG also launched an immediate investigation working alongside cyber experts and appropriate law enforcement agencies. The investigation revealed evidence that an unauthorized third party potentially accessed certain files transferred through MOVEit Transfer that may have contained personal information pertaining to certain APFCU members. APFCU's systems were not accessed during this incident.

APFCU had no indication that files containing APFCU member information were involved in this incident until August 1, 2023. On August 1, 2023, DCG informed APFCU that its files were

included in the files accessed via the MOVEit vulnerability and provided APFCU with copies of those files. APFCU reviewed the files, and on August 8, 2023, determined that the files included personal information for Hawaiian residents. The personal information for the residents included names, Social Security numbers, dates of birth, credit card numbers, account/loan numbers, and account/loan details. At this point, APFCU is not aware of any fraud or identity theft to any individual as a result of this incident.

NOTICE TO HAWAII RESIDENTS

APFCU is notifying five thousand four hundred nine (5,409) Hawaii residents' whose personal information was contained in the data potentially acquired by an unauthorized party. APFCU is providing these notifications via letters sent by first-class United States mail today, August 30, 2023. The notification letters include information on how to protect against fraudulent activity and identity theft, as well as an offer for complimentary credit monitoring and identity theft protection services. The notification letters also include a phone number for individuals to call with any questions they may have regarding the incident. Enclosed is a sample of the notification letter.

STEPS TAKEN RELATING TO THE INCIDENT

APFCU understands that DCG immediately launched an investigation working alongside cyber experts and appropriate law enforcement agencies. DCG has represented to APFCU that it has taken steps to thoroughly investigate the incident with MOVEit and reduced the risk of a similar incident occurring in the future. Separately, APFCU is reviewing its vendor relationships. Finally, as discussed above, APFCU is notifying the involved individuals via mailed notification letter.

CONTACT INFORMATION

Please contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,

Pasha Sternberg

Enclosure

Secure Processing Center
P.O. Box 3826
Suwanee, GA 30024

<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<City>><<State>><<Zip>>

<<Date>>

Dear <<Name 1>> :

<<Variable Data 1>>

We are writing to inform you of a recent data security incident involving the compromise of one of Aloha Pacific Federal Credit Union's business partner's secure file transfer tools used to send some of your personal information. At this time, we have no reason to believe that your personal information has been misused for the purpose of committing fraud or identity theft. Nevertheless, we want to provide you with guidance on what you can do to protect yourself, should you feel it is appropriate to do so.

What Happened? On May 31, 2023, Progress Software reported a previously unknown vulnerability in its MOVEit secure file transfer tool. Thousands of companies, including one of our business partners, Darling Consulting Group ("DCG"), use this file transfer tool to securely transfer data files. Upon notification, DCG immediately suspended use of the MOVEit Transfer tool and it remained disabled until DCG received and implemented a software patch to remediate the issue. DCG also launched an immediate investigation working alongside cyber experts and appropriate law enforcement agencies. The investigation revealed evidence that an unauthorized third party potentially accessed certain files transferred through MOVEit Transfer that may have contained some of your personal information. Aloha Pacific FCU's systems were not accessed during this incident and there is no evidence at this time that your personal information has been used in an unauthorized way.

What Personal Information Was Involved? The personal information involved may have included your name, Social Security number, date of birth, credit card number, account/loan number, and account/loan details.

What We Are Doing. We have been working with DCG to investigate this incident and identify what information may have been involved. We are also exploring steps to help prevent a similar incident from occurring in the future, including reviewing our vendor relationships. Finally, although we are not aware of any instances of fraud or identity theft resulting from this incident, out of an abundance of caution, we are offering a complimentary 12-month membership of Experian IdentityWorks Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary membership, please see the additional information attached to this letter.

What You Can Do. Members are encouraged to set up online banking account alerts and contact Aloha Pacific Federal Credit Union if you see any suspicious activity. We encourage you to enroll in the free identity protection services. You can also find more information on steps to protect yourself against identity theft or fraud in the enclosed *Additional Important Information* sheet.

For More Information. We value the trust you place in us to protect your privacy, take our responsibility to safeguard your personal information seriously, and apologize for any inconvenience or concern this incident might cause. For further information and assistance, please call 833-627-2807 from 5 am to 3 pm HST, Monday through Friday (excluding holidays) or call Aloha Pacific's Contact Center 877-531-3711 from 3 pm to 6 pm HST, Monday through Friday and reference the "MOVEit Incident".

Sincerely,

Vince Otsuka
President & CEO

ACTIVATING YOUR COMPLIMENTARY CREDIT MONITORING

To help protect your identity, we are offering a complimentary 12-month membership of Experian IdentityWorks℠ Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: <<Enrollment Deadline>> (Your code will not work after this date.)
2. Visit the Experian IdentityWorks website to enroll: https://www.experianidworks.com/3bcredit
3. PROVIDE the Activation Code: <<Activation Code>>

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-288-8057. Be prepared to provide engagement number <<Engagement Number>> as proof of eligibility for the identity restoration services by Experian.

Additional details regarding your 12-MONTH EXPERIAN IDENTITYWORKS Credit3B Membership:

A credit card is not required for enrollment in Experian IdentityWorks Credit 3B.
You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- Experian credit report at signup: See what information is associated with your credit file. Daily credit reports are available for online members only.*
- Credit Monitoring: Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- Identity Restoration: Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- Experian IdentityWorks ExtendCARE™: You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- Up to $1 Million Identity Theft Insurance**: Provides coverage for certain costs and unauthorized electronic fund transfers.

Activate your membership today at https://www.experianidworks.com/3bcredit or call 877-288-8057 to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8057.

* Offline members will be eligible to call for additional reports quarterly after enrolling.
** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Additional Important Information

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft. For more information and to contact the FTC, please visit www.ftc.gov/idtheft or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

Credit Reports: You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting www.annualcreditreport.com, by calling toll-free 1-877-322-8228, 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 print a copy of the request form at https://www.annualcreditreport.com/manualRequestForm.action.

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is as follows:

Equifax	Experian	TransUnion
1-866-349-5191	1-888-397-3742	1-800-888-4213
www.equifax.com	www.experian.com	www.transunion.com
P.O. Box 740241	P.O. Box 2002	P.O. Box 2000
Atlanta, GA 30374	Allen, TX 75013	Chester, PA 19016

Fraud Alerts: You may want to consider placing a fraud alert on your credit report. A fraud alert is free and will stay on your credit report for one (1) year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at www.annualcreditreport.com.

Credit and Security Freezes: You may have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:

Equifax Security Freeze	Experian Security Freeze	TransUnion Security Freeze
1-888-298-0045	1-888-397-3742	1-888-909-8872
www.equifax.com	www.experian.com	www.transunion.com
P.O. Box 105788	P.O. Box 9554	P.O. Box 160
Atlanta, GA 30348	Allen, TX 75013	Woodlyn, PA 19094

Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting https://files.consumerfinance.gov/f/documents/bcfp_consumer-rights-summary_2018-09.pdf, or by requesting information in writing from the Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

This notification was not delayed as a result of a law enforcement investigation.

Iowa Residents: Iowa residents can contact the Office of the Attorney general to obtain information about steps to take to avoid identity theft from the Iowa Attorney General's office at: Office of the Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines IA 50319, 515-281-5164.

Maryland Residents: Maryland residents can contact the Office of the Attorney General to obtain information about steps you can take to avoid identity theft from the Maryland Attorney General's office at: Office of the Attorney General, 200 St. Paul Place, Baltimore, MD 21202, (888) 743-0023, http://www.marylandattorneygeneral.gov/.

New York State Residents: New York residents can obtain information about preventing identity theft from the New York Attorney General's Office at: Office of the Attorney General for the State of New York, Bureau of Consumer Frauds & Protection, The Capitol, Albany, New York 12224-0341; https://ag.ny.gov/consumer-frauds/identity-theft; (800) 771-7755.

North Carolina Residents: North Carolina residents can obtain information about preventing identity theft from the North Carolina Attorney General's Office at: North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001; 877-5-NO-SCAM (Toll-free within North Carolina); 919-716-6000; www.ncdoj.gov.

Oregon Residents: Oregon residents are advised to report any suspected identity theft to law enforcement, including the Federal Trade Commission and the Oregon Attorney General. For more information on security locks, you can visit the Oregon Department of Consumer and Business Services website at dfr.oregon.gov/financial/protect/Pages/stolen-identity.aspx and click "Place a credit freeze."

Vermont Residents: If you do not have internet access but would like to learn more about how to place a security freeze on your credit report, contact the Vermont Attorney General's Office at 802-656-3183 (800-649-2424 toll free in Vermont only).