

Kamran Salour

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October 31, 2022

VIA ELECTRONIC MAIL

Attorney General Brian E. Frosh
Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

Email: ldtheft@oag.state.md.us

Re: Data Security Incident Notification

Dear Attorney General Frosh:

We represent Pathward, N.A. (previously known as MetaBank N.A.), which is located at 5501 S. Broadband Lane, Sioux Falls, SD 57108. We are writing to provide notice of a data security incident involving our third-party service provider, Blackhawk Engagement Solutions. This incident impacted two thousand five hundred and forty-one (2,541) Maryland residents.

Notice of this incident will be sent to individuals via U.S. mail on or about October 31, 2022. A copy of the sample notice being sent to the residents is included with this letter.

Who is Blackhawk Engagement Solutions?

Blackhawk Engagement Solutions acts as a third-party service provider on behalf of Pathward. Pathward uses Blackhawk to activate and manage certain prepaid incentive cards (e.g., gift cards) that Pathward issues ("Pathward Prepaid Cards").

Incident Description

On September 11, 2022, Blackhawk discovered irregular activity in connection with www.MyPrepaidCenter.com, the website that Blackhawk operates for cardholders to activate and manage Pathward Prepaid Cards. Blackhawk took prompt steps to investigate the incident and stopped the irregular activity on September 12, 2022.

Blackhawk's investigation revealed that the irregular activity involved unauthorized acquisition of the information described below. The unauthorized acquisition occurred between September 4–12, 2022.

On October 17, 2022, Pathward determined which individuals were involved in this incident and required notification.

Information Involved in the Incident

This incident involved information provided by individuals for their www.MyPrepaidCenter.com profile, including first and last name, email address, and phone number (if any). It also included information relating to the Pathward Prepaid Card(s) they added to their www.MyPrepaidCenter.com profile, such as card numbers, expiration dates, and CVV codes.

Remedial Steps

Upon discovering the irregular activity on September 11, Blackhawk took prompt steps to investigate the incident, and stopped the irregular activity on September 12, 2022.

Blackhawk also promptly blocked the impacted Pathward Prepaid Card(s) so they could not be used, and reissued new card(s), where appropriate, so that consumers could continue to use their Pathward Prepaid Card(s).

Blackhawk also retained third-party experts to conduct both a forensic and PFI investigation. Law enforcement and the payment card brands have been notified as well.

Additional Information

Our goal is to be transparent. The individuals who are receiving notification had useable Pathward Prepaid Cards impacted by this incident. "Useable" means cards that could be used to make a purchase or payment. Useable cards do not include expired cards, cards that had previously been blocked or replaced, or cards that had no funds remaining on them (collectively, "Non-Useable Cards"). Individuals whose Non-Useable Cards were impacted by this incident are not receiving notice because: (1) there is no ability to misuse the card information; and (2) the information at issue would not provide access to a financial account.

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

Sincerely,



Kamran Salour

Email: kamran.salour@troutman.com
Phone: 949.622.2441



P.O Box 989728
West Sacramento, CA 95798-9728

<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

October 31, 2022

Notice of Data Breach

Dear <<First Name>> <<Last Name>>,

We, Blackhawk Engagement Solutions, write to inform you of a recent data security incident that may have involved some of your information. Please read this letter because it describes: (i) the incident and the information involved; (ii) what we did after we learned of it; and (iii) what you can do.

Who is Blackhawk Engagement Solutions?

Blackhawk Engagement Solutions acts as a third-party service provider on behalf of Pathward N.A. (previously known as MetaBank N.A.). Pathward uses Blackhawk to activate and manage certain prepaid incentive cards (e.g., gift cards) that Pathward issues ("Pathward Prepaid Cards").

What Happened?

On September 11, 2022, we discovered irregular activity in connection with www.MyPrepaidCenter.com, the website that Blackhawk operates for cardholders to activate and manage Pathward Prepaid Cards. We took prompt steps to investigate the incident, and we stopped the irregular activity on September 12, 2022.

Our investigation revealed that the irregular activity involved unauthorized acquisition of information about you described below. The unauthorized acquisition occurred between September 4–12, 2022.

What Information Was Involved?

This incident involved information you provided for your www.MyPrepaidCenter.com profile, including your first and last name, email address, and phone number (if any). It also included information relating to your Pathward Prepaid Card(s) you added to your www.MyPrepaidCenter.com profile, such as card numbers, expiration dates, and CVV codes.

What We Are Doing

Upon discovering the irregular activity on September 11, we took prompt steps to investigate the incident, and we stopped the irregular activity on September 12, 2022. We also promptly blocked your impacted Pathward Prepaid Card(s) so it could not be used, and reissued new card(s), where appropriate, so that you could continue to use your Pathward Prepaid Card(s).

We also have reported this incident to law enforcement. Law enforcement has not asked us to delay sending you this letter.

What You Can Do

You may have received an email from Blackhawk at the email address associated with your Pathward Prepaid Card(s) informing you that a replacement card(s) has been issued. If you did not receive an email, please check your spam or junk folder for an email from noreply@myprepaidcenter.com and follow the steps outlined in the email to access and use your replacement Pathward Prepaid Card(s). If you are unable to locate the email and previously created a profile on www.MyPrepaidCenter.com, you may also log in, and your new card details should populate.

If you have already contacted us and received assistance prior to the receipt of this notice related to the replacement of your Pathward Prepaid Card(s), no further action is required on your behalf to replace your Pathward Prepaid Card(s).

Please check the balance on your replacement Pathward Prepaid Card(s). You can check the balance at www.MyPrepaidCenter.com. Upon checking your balance, if you notice activity you do not recognize on your card(s), please visit www.MyPrepaidCenter.com and follow the instructions for contacting customer service to report this to us.

Also, please review the **Reference Guide** included with this letter for additional information and steps you can take.

For More Information

If you have questions about this incident, you can contact us at (833) 814-1788.

We regret any concern or inconvenience this matter may have caused you and appreciate your patience and understanding.

Sincerely,

Tom Vagt
VP of Customer Service

Reference Guide

Please review the information below and consider taking the steps noted.

Order And Review Your Free Credit Report. You can remain vigilant by monitoring your free credit report, which you can order at www.annualcreditreport.com, by calling toll-free at 1-877-322-8228, or by completing the Annual Credit Report Request Form on the U.S. Federal Trade Commission's ("FTC's") website at <https://consumer.ftc.gov/articles/free-credit-reports> and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. The three nationwide consumer reporting agencies provide free annual credit reports only through the website, toll-free number, or request form. When you receive your credit report, review it carefully. Look for accounts you did not open, or inaccuracies in your information. If you see anything inaccurate or that you do not understand, contact the consumer reporting agency.

Report Identity Theft or Fraud to FTC, Law Enforcement, and Attorneys General. You can remain vigilant by reviewing financial account statements for fraudulent transactions or identity theft. If you detect any unauthorized transactions in a financial account, promptly notify your financial institution. If you detect any incident of identity theft, promptly report the incident to law enforcement, the FTC, and your state Attorney General.

Learn More About Identity Theft From the FTC. You can contact the FTC to learn more about how to protect yourself from becoming a victim of identity theft and how to repair identity theft: Federal Trade Commission Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft/ and www.identitytheft.gov.

Fraud Alerts on Your Credit File. To help protect yourself from possible identity theft, consider placing a fraud alert on your credit file. You can place a fraud alert on your credit report by calling any one of the toll-free numbers provided below. For more information on fraud alerts, you can contact the consumer reporting agencies listed below or the FTC.

Equifax	Equifax Information Services LLC P.O. Box 740241 Atlanta, GA 30374	1-800-685-1111	www.equifax.com
Experian	Experian Inc. P.O. Box 9554 Allen, TX 75013	1-888-397-3742	www.experian.com
TransUnion	TransUnion Consumer Solutions P.O. Box 2000 Chester, PA 19016	1-800-909-8872	www.transunion.com

Security Freezes on Your Credit File. You have the right to place a "security freeze" on your credit file. A security freeze is designed to prevent potential creditors from accessing your credit file at the consumer reporting agencies without your consent. A security freeze must be placed on your credit file at each consumer reporting agency individually. For more information on security freezes, you can contact the consumer reporting agencies listed above or the FTC. As the instructions and fees (if any) for placing a security freeze differ from state to state, please contact the three nationwide consumer reporting agencies to find out more information. The consumer reporting agencies may require proper identification prior to honoring your request. For example, you may be asked to provide: your full legal name, Social Security Number, date of birth, addresses where you have lived in the past five years, copies of government-issued identification cards, and proof of your current address.

Additional Rights Under the FCRA. 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 reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violators. You 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 you to review your rights pursuant to the Fair Credit Reporting Act by: (i) visiting https://files.consumerfinance.gov/f/documents/bcfp_consumer-rights-summary_2018-09.pdf; or (ii) by writing to Consumer Financial Protection Bureau, 1700 G Street, N.W., Washington, DC 20552.

For Maryland Residents. You can obtain information about avoiding identity theft from the Maryland Attorney General at: Maryland Office of the Attorney General Consumer Protection Division, 200 St. Paul Place Baltimore, MD 21202, (888) 743-0023 (toll-free in Maryland), (410) 576-6300, www.marylandattorneygeneral.gov.

For New Mexico Residents. You have rights under the federal Fair Credit Reporting Act (“FCRA”) including: to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit www.ftc.gov.

For New York Residents. You can obtain information about security breach response, identity theft prevention, and identity protection information from the New York State Office of the Attorney General at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755 (toll-free), 1-800-788-9898 (TDD/TTY toll-free line), <https://ag.ny.gov/>, and at: Bureau of Internet and Technology (BIT), 28 Liberty Street, New York, NY 10005, Phone: (212) 416-8433, <https://ag.ny.gov/internet/resource-center>.

For North Carolina Residents. You can obtain information about avoiding identity theft from the North Carolina Attorney General at: North Carolina Attorney General’s Office 9001 Mail Service Center, Raleigh, NC 27699-9001, (877) 566-7226 (toll-free in North Carolina), (919) 716-6400, www.ncdoj.gov.

For Residents of Oregon. You may report suspected identity theft to law enforcement, including the Office of the Oregon Attorney General and the FTC. Contact information for the FTC is included in your notice. The Office of the Oregon Attorney General can be reached: (1) by mail at 1162 Court St. NE, Salem, OR 97301; (2) by phone at (877) 877-9392; or (3) online at <https://www.doj.state.or.us/>.

For Rhode Island Residents. You can obtain information about avoiding identity theft from the Rhode Island Office of the Attorney General at: Rhode Island Office of the Attorney General, Consumer Protection Unit 150, South Main Street, Providence, RI 02903, (401)-274-4400, www.riag.ri.gov. Data on approximately [REDACTED] Rhode Island residents were involved in this incident. You have the right to obtain a police report, and to request a security freeze (charges may apply), as described above.

For Washington, D.C. Residents. You can obtain information about avoiding identity theft from the Office of the Attorney General for the District of Columbia at: Office of the Attorney General for the District of Columbia, 400 6th Street NW, Washington, D.C. 20001, (202)-727-3400, www.oag.dc.gov. You have the right to request a security freeze (without any charge) as described above.