

**Burns White**

**ATTORNEYS AT LAW**

A Limited Liability Company

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November 23, 2022

**VIA E-MAIL and U.S. MAIL**

Office of the Attorney General  
Attn: Security Breach  
200 St. Paul Place  
Baltimore, MD 21202  
E-mail: idtheft@oag.state.md.us

RE: Notice of Data Event

Dear Sir or Madam:

We represent First National Bank of Pennsylvania ("FNB"), located at 12 Federal Street, Pittsburgh, PA 15212, with respect to the recent data incident described herein. We are writing on behalf of FNB to notify your Office of an incident that may affect the security of certain personal information of approximately 2,462 Maryland residents. The investigation into this event is ongoing, and this notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, FNB does not waive any rights or defenses regarding the applicability of Maryland law, the Maryland data breach notification statute, or personal jurisdiction.

**Nature of the Data Event**

FNB contracts with an outside vendor to provide print and mail services. On or about October 24, 2022, FNB became aware of an issue that occurred at the outside vendor wherein certain printed monthly bank statements ending September 30 and October 6, 2022, were not properly aligned during the printing process. As a result, some statements may have inadvertently included the name and account number of the next printed statement.

Upon discovery of this issue, steps were immediately taken to rectify it. FNB worked with its outside vendor to assess the functionality of their systems, mitigate the impact and enhance their quality control processes to avoid any similar issues going forward. At this time, we are unaware of any identity theft or fraud as a result of this incident.

**Notice to Maryland Residents**

On or around November 25, 2022, FNB will begin providing written notice of this incident to potentially affected individual customers, including approximately 2,462 Maryland residents. Written notice is being provided in substantially the same form as the letter attached hereto as **Exhibit A**.



Burns White Center | 48 26th Street | Pittsburgh, PA 15222 | (412) 995-3000

DELAWARE | FLORIDA | NEW JERSEY | NEW YORK | OHIO | PENNSYLVANIA | WEST VIRGINIA | BURNSWHITE.COM

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

Upon discovering the data incident, FNB immediately launched an investigation to determine the nature and scope of this incident, as well as determine what data may potentially be affected. FNB will provide written notice to the individual customers whose information may have been affected. This notice includes an offer of complimentary access to twelve (12) months of credit monitoring and identity theft protection services, including identity restoration services, through Experian IdentityWorks for impacted individuals.

Additionally, FNB is providing potentially impacted individual customers with guidance on how to better protect against identity theft and fraud, including 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. FNB will also be providing notice of this event to other regulators as may be required under the applicable state or federal laws.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact me at (412) 995-3004.

Very truly yours,

/s/ Lyle Washowich

Lyle Washowich

LW/gad

# EXHIBIT A

First National Bank  
3015 Glimcher Blvd  
Hermitage, PA 16148

Date

<<Address Line 1>>  
<<Address Line 2>>  
<<Address Line 3>>  
<<Address Line 4>>  
<<City>><<State>><<Zip>>

**Re: Notice of Data Incident**

Dear <<Address Line 1>>:

I am writing to notify you of an incident that occurred at a third-party vendor that may affect the privacy of some of your personal information. First National Bank of Pennsylvania (FNB) takes the protection of your information very seriously, and although we have no evidence of identity theft or fraud as a result of this incident, this letter provides details of the incident, the response and resources available to you to help protect your personal information from possible misuse, should you feel it is appropriate to do so.

**What Happened?** On or about October 24, 2022, FNB became aware of an issue that occurred at our outside vendor who provides print and mail services to FNB. Certain printed monthly bank statements ending September 30 and October 6, 2022, were not properly aligned during the printing process. As a result, some statements may have inadvertently included the name and account number of the next printed statement. Once this issue was discovered, steps were taken immediately to rectify it.

**What Information Was Involved?** Our investigation determined that your name and account number may have been inadvertently included at the bottom of another customer's monthly bank statement for statements ending September 30 or October 6, 2022. At this time, we are unaware of any identity theft or fraud as a result of this incident.

**What We Are Doing.** Information privacy and security are among our highest priorities. Upon discovering this incident, we immediately worked with our vendor to assess the functionality of their systems, mitigate the impact and enhance their quality control processes to avoid any similar issues going forward.

**What You Can Do.** We encourage you always to remain vigilant against incidents of identity theft and fraud, and recommend you review your account statements, monitor your credit reports for suspicious activity and detect errors for the next 12 to 24 months. If you suspect fraud in your accounts, please report such activity to FNB immediately by calling (800) 555-5455. Please also review the information contained in the enclosed *Steps You Can Take to Protect Your Information*.

Additionally, we are offering you access to 12 months of credit monitoring and identity theft protection services through Experian IdentityWorks at no cost to you. If you wish to activate these services, you may follow the instructions in the enclosure. Although we are unaware of any identity theft or fraud as a result of this incident, we encourage you to enroll in these services as an added precaution if you feel it is appropriate to do so.

**For More Information.** We understand that you may have questions about this matter that are not addressed in this letter. If so, please contact our toll-free assistance line at (800) 555-5455, 8:00 AM to 9:00 PM ET, Monday through Friday or 8:00 AM through 5:00 PM ET, Saturday and Sunday. You may also write to FNB at 3015 Glimcher Boulevard, Hermitage, PA 16148, Attn: Legal Department.

Sincerely,

Scot A. Pflug  
Chief Information Security Officer  
First National Bank

## STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

### **Enroll in Credit Monitoring**

As a safeguard, we have arranged for you to enroll, at our expense and at no cost to you, in credit monitoring and identity theft protection services for 12 months provided by Experian IdentityWorks.

If you wish to take advantage of this monitoring service, you must enroll by **XX/XX/XXXX**.

**How to Enroll:** To activate this coverage please visit the website listed below and enter the activation code. The activation code is required for enrollment and can only be used one time by the individual addressed.

Web Site: **XXXXXXXXXXXX**

Activation Code: **XXXXXXXXXXXX**

If you have any questions or would like to enroll by phone, you may call (877) 890-9332.

In order to enroll, you will need to provide the following personal information:

- Mailing Address
- Phone Number
- Social Security Number
- Date of Birth
- E-mail Address
- Activation Code

This service is complimentary; no method of payment will be collected during enrollment and there is no need to cancel. We encourage you to enroll today should you feel the need to do so.

### **Monitor Accounts**

Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. We recommend periodically obtaining credit reports from each nationwide credit reporting agency and having information relating to fraudulent transactions deleted. To order your free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit bureaus listed on this page to request a free copy of your credit report.

You have the right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit mortgage or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies using the following information:

#### **Experian**

P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

#### **TransUnion**

P.O. Box 160  
Woodlyn, PA 19094  
1-888-909-8872  
[www.transunion.com/credit-freeze](http://www.transunion.com/credit-freeze)

#### **Equifax**

P.O. Box 105788  
Atlanta, GA 30348  
1-888-298-0045  
[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. All of the addresses where you have lived over the prior five (5) 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, military identification, etc.);
7. If you are a victim of identity theft, a copy of the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your file at no cost. An initial fraud alert is a one-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 you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the major consumer reporting agencies using the following information:

**Experian**

P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/fraud/center.html](http://www.experian.com/fraud/center.html)

**TransUnion**

P.O. Box 2000  
Chester, PA 19016  
1-800-916-8800  
[www.transunion.com/fraud-alerts](http://www.transunion.com/fraud-alerts)

**Equifax**

P.O. Box 105069  
Atlanta, GA 30348  
1-800-525-6285  
[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

You can further educate yourself regarding identity theft prevention, fraud alerts, security freezes and the steps you can take to protect yourself by contacting the consumer reporting agencies, the Federal Trade Commission or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 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. You can obtain further information about how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported and your state Attorney General. This notice has not been delayed by law enforcement.

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

**For Maryland residents**, the Attorney General can be contacted at 200 St. Paul Place, Baltimore, MD 21202, (410) 576-6300; 1-888-743-0023; or [www.oag.state.md.us](http://www.oag.state.md.us).

**For New York residents**, the Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <https://ag.ny.gov/>.

**For North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or (919) 716-6000; or [www.ncdoj.gov](http://www.ncdoj.gov). You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.