



MULLEN
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December 22, 2023

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

Re: Notice of Data Event

To Whom It May Concern:

We represent First Financial Bank (“FFB”), located at 300 E. Peach Street, El Dorado, AR 71730, and are writing to notify your Office of an incident that may affect the security of certain personal information relating to approximately six (6) Maryland residents. By providing this notice, FFB does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland data event notification statute, or personal jurisdiction.

Nature of the Data Event

On or about September 13, 2023, FFB discovered suspicious activity involving certain employee email accounts. FFB immediately secured the accounts involved and launched an investigation to determine the full nature and scope of the incident. Through this investigation, FFB determined that an email account was subject to unauthorized access between August 31, 2023, and September 13, 2023. In response to the unauthorized access, FFB undertook a comprehensive review of the contents of the potentially impacted account to determine what information was contained therein and to whom it relates. Through the review, on or about November 11, 2023, FFB determined that sensitive information was present in the account at the time of the incident, and thus potentially accessed without authorization.

The information that could have been subject to unauthorized access includes name, Social Security number and bank account number.

Notice to Maryland Residents

On or about December 22, 2023, FFB began providing written notice of this incident to approximately six (6) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon discovering the event, FFB moved quickly to investigate and respond to the incident, assess the security of FFB systems, and identify potentially affected individuals. Further, FFBC notified federal law enforcement regarding the event. FFB is also working to implement additional safeguards and training to its employees. FFB is providing access to credit monitoring services for 2 years through IDX, to individuals whose Social Security numbers were potentially affected by this incident, at no cost to these individuals.

Additionally, FFB is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. FFB is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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.

FFB is providing written notice of this incident to relevant state and federal regulators, as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4554.

Very truly yours,

Matthew V. Toldero of
MULLEN COUGHLIN LLC

MVT/hkl
Enclosure

EXHIBIT A



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

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

Enrollment Code: <<Enrollment Code>>

To Enroll, Scan the QR Code Below:



Or Visit:

<https://app.idx.us/account-creation/protect>

December 22, 2023

<<Notice of Data Breach/Notice of Security Event>>

Dear <<First Name>> <<Last Name>>:

First Financial Bank (“FFB”) is writing to notify you of an incident that may affect the privacy of some of your information. We take this incident very seriously and are providing details of the incident and the resources available to you to help protect your information from possible misuse, should you feel it is appropriate to do so.

What Happened? On or about September 13, 2023, FFB discovered suspicious activity within our email environment. We immediately secured the environment and launched an investigation to determine the full nature and scope of the incident. Through this investigation, we determined that an email account was subject to unauthorized access between August 31, 2023, and September 13, 2023. In response to the unauthorized access, FFB undertook a comprehensive review of the contents of the potentially impacted account to determine what information was contained therein and to whom it relates. Through the review, on or about November 11, 2023, we determined that sensitive information was present in the account at the time of the incident, and thus potentially accessed without authorization.

What Information Was Involved? While we have no evidence that any of your information has been subject to actual or attempted misuse, we are notifying you out of an abundance of caution and providing information and resources to help protect your personal information. The following types of your information were present in the accessed account: your name and <<EXTRA 2>>.

What We Are Doing. Upon discovery of this incident, we immediately took steps to secure the account by changing the password and conducted a diligent investigation to confirm the nature and scope of the incident. As part of FFB’s ongoing commitment to the security of information, our policies and procedures regarding information security are being reviewed and enhanced, additional safeguards have been implemented, and additional training is being conducted to reduce the likelihood of a similar event in the future.

As an added precaution, we are also offering you complimentary access to 24 months of credit monitoring and identity theft restoration services, through IDX. You will need to enroll yourself in these services if you wish to do so, as we are not able to activate them on your behalf. Please review the instructions contained in the attached *Steps You Can Take to Help Protect Your Personal Information* for additional information on these services.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud, to monitor your account statements for suspicious activity and to detect errors, and to review your credit reports for suspicious activity.

You may also review the enclosed *Steps You Can Take to Help Protect Your Personal Information* for additional guidance to better protect against the possibility of identity theft and fraud. We also encourage you to enroll in the complimentary credit monitoring services we are offering you.

For More Information. We understand you may have questions about the incident that are not addressed in this letter. If you have additional questions, or need assistance, please contact (870) 875-7121 Monday through Friday from 8:00 am to 5:00 pm Central Time, excluding holidays. You may also write to FFB at 300 E. Peach Street, El Dorado, AR 71730.

Sincerely,
First Financial Bank

Steps You Can Take to Help Protect Your Personal Information

Enroll in Credit and Identity Monitoring

1. Website and Enrollment. Scan the QR image or go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. For enrollment assistance by phone, please call 1-800-939-4170, where agents are available Monday through Friday, 8:00 am to 8:00 pm Central Time. Please note the deadline to enroll is March 22, 2024.

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

3. Review your credit reports. We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

You should also know that you have the right to file a police report if you ever experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

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 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:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
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; 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.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 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, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

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.