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April 24, 2024

VIA E-MAIL (IDTHEFT@OAG.STATE.MD.US)

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

Re: *Incident Notification*

Dear Attorney General Brown:

We are writing on behalf of our client, First National Bank of Michigan ("FNBM"), to notify your office of a security incident.

FNBM detected and took measures to address a security incident that involved unauthorized access to an employee email account between December 11, 2023 and December 13, 2023. An investigation was conducted, which identified unauthorized access to certain files in the affected email account. A review was then conducted of those files to determine the information they contained. The review, which was completed on March 7, 2024, determined that the files contained the name and financial account information of one Maryland resident.

On April 24, 2024, FNBM mailed a notification letter to the Maryland resident via U.S. mail in accordance with Md. Code Ann., Com. Law § 14-3504. A copy of the notification letter is enclosed.

To help prevent this type of incident from happening again, FNBM implemented additional security measures to enhance the security of their email environment and will continue to train employees concerning data security.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

Eric B. Gyasi
Counsel

Enclosure

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

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

First National Bank of Michigan ("FNBM") recognizes the importance of protecting the personal information we maintain. We are writing to inform you of an incident that may have involved some of your information. This notice explains the incident, the measures we have taken in response, and some additional steps you may consider taking in response.

FNBM detected and took measures to address a security incident that involved unauthorized access to an employee email account between December 11, 2023 and December 13, 2023. An investigation was conducted, which identified unauthorized access to certain files in the affected email account. A review was then conducted of those files to determine the information they contained. The review, which was completed on March 7, 2024, determined that the files contained your <<b2b_text_1 (name and data elements)>><<b2b_text_2 (data elements cont.)>>.

For more information on identity theft prevention, as well as some additional steps you can take in response, please see the additional information provided in this letter.

We regret any inconvenience or concern this incident may cause. To help protect against an incident like this happening again, we implemented additional security measures to enhance the security of our email environment and will continue to train our employees concerning data security. If you have any questions, please call (866) 528-8730, Monday through Friday, from 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays.

Matthew J. Morgan
SVP, Chief Financial Officer

ELN-21748

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 1000, Chester, PA 19016, www.transunion.com, 1-800-888-4213

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.identitytheft.gov

Fraud Alerts and Credit or Security Freezes:

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com
- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 160, Woodlyn, PA 19094, www.transunion.com

You'll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

FNBM is located at 348 W Michigan Ave, Kalamazoo, MI 49007 and can be reached at (269) 349-0100.

Additional information for residents of the following states:

New York: You may contact and obtain information from these state agencies: New York Department of State Division of Consumer Protection, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, http://www.dos.ny.gov/consumerprotection; and New York State Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, https://ag.ny.gov

North Carolina: You may contact and obtain information from your state attorney general at: North Carolina Attorney General's Office, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov