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November 25, 2024

VIA E-MAIL

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

Re: Notice of Data Event

To Whom It May Concern:

We represent Frontier Ag, Inc. ("FAI") located at 1202 West Hwy 24, Goodland, KS 67735, and write to notify your office of an incident that may affect the security of certain personal information relating to five (5) Maryland residents. This notice will be supplemented with significant developments. By providing this notice, FAI 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 August 13, 2024, FAI became aware of suspicious activity affecting systems within its network. FAI promptly responded and launched an investigation to confirm the nature and scope of the incident, as well as to restore impacted computer systems to operability. Through the investigation, FAI learned that an unauthorized actor accessed certain data between August 12, 2024 and August 13, 2024. FAI then conducted a time intensive and thorough review of the data that was at risk to determine what was contained therein and to whom it relates for purposes of providing notice. Although FAI has no evidence of any identity theft or fraud in connection with this incident, FAI is notifying those individuals whose information was potentially impacted.

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

Notice to Maryland Residents

On or about November 25, 2024, FAI provided written notice of this incident to five (5) 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, FAI moved quickly to investigate and respond to the incident, assess the security of FAI systems, and identify potentially affected individuals. Further, FAI notified federal law enforcement regarding the event. FAI is also working to implement additional safeguards and training to its employees. FAI is providing access to credit monitoring services for twelve (12) months, through Equifax, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, FAI 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. FAI is providing individuals with 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.

FAI also provided notice to federal law enforcement and is cooperating with its investigation. FAI is providing written notice of this incident to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4888.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Richard Aponte-Boyd', with a stylized flourish at the end.

Richard Aponte-Boyd of
MULLEN COUGHLIN LLC

RAB/klh
Enclosure

EXHIBIT A



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

Postal Endorsement Line

<<Full Name>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<City>>, <<State>> <<Zip>>

<<Country>>

***Postal IMB Barcode

<<Date>>

NOTICE OF <<SECURITY INCIDENT/DATA BREACH>>

Dear <<Full Name>>:

Frontier Ag, Inc. ("FAI") writes to notify you of an incident that may impact the privacy of some of your information. While we have no evidence of misuse of information as a result of this incident, we are providing you with notice of the incident, steps we have taken in response, and resources available to help you better protect your information, should you feel it is appropriate to do so.

What Happened? On August 13, 2024, FAI became aware of suspicious activity affecting systems within our network. We promptly responded and launched an investigation to confirm the nature and scope of the incident and restore impacted computer systems to operability. Through the investigation, we learned that an unauthorized actor accessed certain data between August 12, 2024 and August 13, 2024. We then conducted a time intensive and thorough review of the data that was at risk to determine what was contained therein and to whom it relates for purposes of providing notice. We are notifying you because certain information of yours was contained in the files.

What Information Was Involved? The information that was present in the files viewed or accessed as a result of this incident could include your <<data elements>>, and your name. At this time, we have no indication that your information was misused or used to commit identity theft or fraud as a result of this incident. We are providing this notice out of an abundance of caution as your information was potentially accessed in the system at the time of the incident.

What Are We Doing? The confidentiality, privacy, and security of personal information is among FAI's highest priorities, and we have security measures in place to protect information in our care. Upon discovery, we promptly commenced an investigation to confirm the nature and scope of this incident. This investigation and response included confirming the security of our systems, reviewing the contents of relevant data for sensitive information, and notifying potentially impacted individuals. While we have measures in place to protect information in our care, as part of our ongoing commitment to the privacy of information, we continue to review our policies, procedures and processes related to the storage and access of personal information to reduce the likelihood of a similar future event. We will also notify applicable regulatory authorities where necessary.

As an added precaution, we are providing you with <<12/24>> months of complimentary access to credit monitoring and identity restoration services through Equifax, at no cost to you. Should you wish to receive these services, you will need to enroll yourself as we are not able to do so on your behalf. You may find instructions on how to enroll in these services in the enclosed *Steps You Can Take to Help Protect Your Personal Information*.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors over the next 12 to 24 months. You can find out more about how to safeguard your information in the enclosed *Steps You Can Take to Help Protect Your Personal Information*. There, you will find additional information about the complimentary credit monitoring and identity restoration services we are offering and how to enroll.

For More Information. We understand you may have questions about this incident that are not addressed in this letter. To ensure your questions are answered in a timely manner, please call our dedicated assistance line at 888-458-5690, Monday through Friday from 9:00 am to 9:00 pm Eastern time, excluding U.S. holidays.

We sincerely regret any inconvenience or concern this incident may cause you. Protecting your information is very important to us, and we remain committed to safeguarding the information in our care.

Sincerely,

Frontier Ag, Inc.

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

Enroll in Monitoring Services



<<Full Name>>

Enter your Activation Code: <<Activation Code>>

Enrollment Deadline: <<Enrollment Deadline>>

Equifax Complete™ Premier

*Note: You must be over age 18 with a credit file to take advantage of the product

Key Features

- Annual access to your 3-bureau credit report and VantageScore¹ credit scores
- Daily access to your Equifax credit report and 1-bureau VantageScore credit score
- 3-bureau credit monitoring² with email notifications of key changes to your credit reports
- WebScan notifications³ when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts⁴, which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock⁵
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁶.
- Lost Wallet Assistance if your wallet is lost or stolen, and one-stop assistance in canceling and reissuing credit, debit and personal identification cards.

Enrollment Instructions

Go to www.equifax.com/activate

Enter your unique Activation Code of <<Activation Code>> then click “Submit” and follow these 4 steps:

1. **Register:**

Complete the form with your contact information and click “Continue”.

If you already have a myEquifax account, click the ‘Sign in here’ link under the “Let’s get started” header.

Once you have successfully signed in, you will skip to the Checkout Page in Step 4

2. **Create Account:**

Enter your email address, create a password, and accept the terms of use.

3. **Verify Identity:**

To enroll in your product, we will ask you to complete our identity verification process.

4. **Checkout:**

Upon successful verification of your identity, you will see the Checkout Page.

Click ‘Sign Me Up’ to finish enrolling.

You’re done!

The confirmation page shows your completed enrollment.

Click “View My Product” to access the product features.

¹The credit scores provided are based on the VantageScore® 3.0 model. For three-bureau VantageScore credit scores, data from Equifax®, Experian®, and TransUnion® are used respectively. Any one-bureau VantageScore uses Equifax data. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your creditworthiness.

²Credit monitoring from Experian and TransUnion will take several days to begin. ³WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers’ personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers’ personal information is at risk of being traded. ⁴The Automatic

Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC. ⁵Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer’s identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com

⁶The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

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 Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 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 New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov>.

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.