

EXHIBIT 1

We are writing to notify your office of an event that may affect the security of certain information relating to eight hundred thirty-five (835) Washington residents. By providing this notice, AT Retirement Services, LLC and American Trust Company (both entities collectively described herein as “American Trust”) do not waive any rights or defenses regarding the applicability of Washington law, the applicability of the Washington data event notification statute, or personal jurisdiction.

Nature of the Data Event

On or about August 13, 2024, American Trust became aware of suspicious activity within its email environment. In response, American Trust launched an investigation to determine the full nature and scope of the activity. The investigation determined that certain emails may have been copied without authorization between August 8, 2024, and August 13, 2024. American Trust began a comprehensive review of the relevant emails. On December 5, 2024, the review determined that information related to certain Washington residents was contained in the relevant emails at the time of the event.

The information that could have been subject to unauthorized access includes name, Social Security number, and date of birth.

Notice to Washington Residents

On or about January 2, 2025, American Trust provided written notice of this event to eight hundred thirty-five (835) Washington residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*. On December 31, 2024, American Trust also posted notice of this event to its website and on January 3, 2025, will provide notice to relevant statewide media. Copies of the website and media notices are attached hereto as *Exhibit B* and *Exhibit C*, respectively.

Other Steps Taken and To Be Taken

Upon discovering the event, American Trust moved quickly to investigate and respond to the event, assess the security of American Trust systems, and identify potentially affected individuals. American Trust is also working to implement additional safeguards and training to its employees. American Trust is providing access to credit monitoring services for twelve (12) months, through Experian IdentityWorks, to individuals who received notice of this event, at no cost to these individuals.

Additionally, American Trust is providing impacted individuals with guidance on how to better protect against identity theft and fraud. American Trust 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.

American Trust is providing written notice of this event to relevant state regulators, as necessary.

EXHIBIT A

Postal Endorsement Line

<<Full Name>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<City>>, <<State>> <<Zip>>
<<Country>>
***Postal IMB Barcode

<<Date>>

<< Variable data 2 >>

Dear <<Full Name>>:

American Trust¹ provides certain services to employer sponsored and qualified retirement plans, including recordkeeping and administrative services. American Trust is writing to notify you of a recent event that may affect the privacy of some of your information. This notice provides information about the event, our response, and resources available to help protect your information, should you feel it is appropriate to do so. American Trust takes your privacy very seriously and we hope that our response to this event demonstrates our commitment to you and your privacy.

What Happened? On or about August 13, 2024, we became aware of suspicious activity within our email environment. In response, we began an investigation to determine the full nature and scope of the activity. Our investigation determined that certain emails may have been copied without authorization between August 8, 2024, and August 13, 2024. We conducted a comprehensive review of the relevant emails. On December 5, 2024, our review determined that information related to you was contained in the relevant emails at the time of the event..

What Information Was Involved? Our review determined that the following types of information related to you were present in the relevant emails at the time of the event: name and <<Data Elements>>.

What We Are Doing. We take this matter and the security of information in our care seriously. Upon learning of the suspicious activity, we took steps to secure the email tenant, assess the security of the email environment, and investigate the activity. We are notifying potentially impacted parties to make them aware of this event and are providing them with resources that they may consider. As part of our ongoing commitment to the privacy of information in our care, we are reviewing and enhancing our existing policies and procedures.

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. We are also providing you access to <<CM Duration>> months of complimentary credit monitoring through Experian IdentityWorks. Please note that we cannot enroll you into these services automatically. Additional information and resources are included in the *Steps You Can Take to Protect Personal Information* section of this letter.

For More Information. If you have with questions about this matter you may contact our toll-free dedicated assistance line at 855-295-5614, Monday through Friday, from 9 a.m. through 9 p.m. Eastern Time (excluding U.S. holidays). You can also write to us at 51 Germantown Court, Suite 203, Cordova, TN 38018.

Sincerely,

American Trust

¹ “American Trust” is defined as AT Retirement Services, LLC and American Trust Company.

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for <<CM Duration>> months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for <<CM Duration>> months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary <<CM Duration>> -month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** <<Enrollment Deadline>> (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your **activation code**: <<Activation Code>>

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 1-877-288-8057 by <<Enrollment Deadline>>. Be prepared to provide engagement number B137485 as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR <<CM Duration>> MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

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; 1-202-442-9828; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 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 Avenue, 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.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; 1-401-274-4400; and www.riag.ri.gov;. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. There are approximately <<RI Count>> Rhode Island residents that may be impacted by this event.

EXHIBIT B



WorkSaveRetire®

Let Our Expertise Work For You

Save Time, Reduce Liability and Scale Your Business with WorkSaveRetire

Make your retirement plans tick with WorkSaveRetire. This innovative retirement solution streamlines plan operations, enhances sponsor satisfaction, improves participant outcomes and frees up time so you can focus on elevating your business

LEARN MORE



Notice of Data Event

Last Updated on 12/31/24

AT Retirement Services, LLC and American Trust Company (both entities are collectively described herein as "American Trust") is providing notice of an event that may affect the security of information related to certain individuals. We are providing notified individuals with information about the event, our response, and additional measures they can take to help protect their information, should they feel it appropriate to do so. American Trust takes your privacy very seriously and we hope that our response to this event demonstrates our commitment to you and your privacy.

What Happened? On or about August 13, 2024, we became aware of suspicious activity within our email environment. In response, we began an investigation to determine the full nature and scope of the activity. Our investigation determined that certain emails may have been copied without authorization between August 8, 2024, and August 13, 2024. We conducted a comprehensive review of the relevant emails. On December 5, 2024, our review determined that information related to certain individuals was contained in the relevant emails at the time of the event.

What Information was Involved? The information related to American Trust customers that was potentially affected by the event includes their name and a combination of information, including, but not limited to: Social Security number, driver's license number or state identification number, financial account number, and date of birth.

What We Are Doing? We take this matter and the security of information in our care seriously. Upon learning of the suspicious activity, we took steps to secure the email tenant, assess the security of the email environment, and investigate the activity. We are notifying potentially impacted parties to make them aware of this event and are providing them with resources that they may consider. As part of our ongoing commitment to the privacy of information in our care, we are reviewing and enhancing our existing policies and procedures.

What You Can Do. Individuals may consider remaining vigilant against incidents of identity theft and fraud by reviewing relevant account statements, if any, and monitoring their free

For More Information. Individuals with questions regarding this event may call [855-295-5614](tel:855-295-5614), Monday through Friday, from 9:00 am – 9:00 pm Eastern Standard Time, excluding major holidays. Individuals can also write to American Trust at 51 Germantown Court, Suite 203, Cordova, TN 38018.

Sincerely,

American Trust

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

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](tel: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
Equifax Website	Experian Website	TransUnion Website
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](tel:1-877-438-4338)); and TTY: [1-866-653-4261](tel: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; [1-202-442-9828](tel:1-202-442-9828); and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; [1-410-576-6300](tel:1-410-576-6300) or [1-888-743-0023](tel: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

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 Avenue, 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](tel: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](tel:1-877-566-7226) or [1-919-716-6000](tel:1-919-716-6000); and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; [1-401-274-4400](tel:1-401-274-4400); and www.riag.ri.gov. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. There are approximately 23 Rhode Island residents that may be impacted by this event.

CONTACT US

Let's Talk
Corporate Offices:
(877) 411-8781

Plan Participants:
(866)-680-7000

CUSTOMER SERVICE

Privacy Policy
CCPA Policy
CCPA Request
Need to send a large file?

INFORMATION

American Trust Retirement is part of
AmericanTCS:

- American Trust Custody
- American Trust Wealth
- American Trust Retirement
- American Technology Automation
- AmericanTCS Fiduciary Services

[Disclosures](#) | [Career Opportunities](#)



EXHIBIT C

American Trust Provides Notice of a Data Security Event

Cordova, TN January 3, 2025 — AT Retirement Services, LLC and American Trust Company (both entities are collectively described herein as “American Trust”) are providing notice of an event that may affect the security of information related to individuals.

On or about August 13, 2024, American Trust became aware of suspicious activity within its email environment. In response, they began an investigation to determine the full nature and scope of the activity. The investigation determined that certain emails may have been copied without authorization between August 8, 2024, and August 13, 2024. American Trust conducted a comprehensive review of the relevant emails. On December 5, 2024, the review was completed and determined that certain individuals were impacted by the event. The types of information impacted includes, but not limited to, name, address, Social Security number, driver’s license number or state identification number, financial account number, and date of birth. On December 31, 2024, American Trust began providing notice of this event on its website which remains available to review for additional information at <https://www.americantrustretirement.com>.

Security of information in its care is among American Trust’s highest priorities. When American Trust became aware of this event, American Trust promptly took steps to investigate the activity.

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 that directs a business to take steps to verify the consumer’s identity before extending new credit. Victims of identity theft are entitled to an extended, 7-year fraud alert. Consumers also 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. 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. Should consumers wish to place a credit freeze or fraud alert, they may contact the three major credit reporting bureaus: **Equifax**—www.equifax.com and 1-888-298-0045; **Experian**—www.experian.com and 1-888-397-3742; **TransUnion**—www.transunion.com and 1-800-916-8800. Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect their 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 Ave NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261.

Individuals with questions regarding this event may call 855-295-5614 Monday through Friday, from 9:00 am – 9:00 pm Eastern Standard Time, excluding major holidays.