July 3, 2025

Via Portal



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Re: Legal Notice of Security Incident

Dear Sir or Madam:

I am writing on behalf of my client, Finastra, to inform you that Finastra was the target of a cybersecurity incident that involved the personal information of 679 Washington residents. We are continuing to receive direction regarding notice from our client, and we will provide supplemental notice if the total number of impacted residents changes. Attached as Appendix A is the Finastra client who has directed Finastra to provide notice to your office on their behalf.

On November 7, 2024, Finastra identified a cybersecurity incident that, upon investigation, was limited to its Secure File Transfer Platform ("SFTP"), Aspera. Upon detecting the incident, Finastra promptly took steps to secure its systems and launched an investigation. Finastra also reported the incident to federal law enforcement and engaged third party incident response professionals and counsel. Finastra's investigation determined that an unauthorized third-party accessed the Aspera platform at various times between October 31, 2024 and November 8, 2024. On October 31, 2024, the unauthorized third-party obtained certain files from the SFTP.

Finastra has no evidence to suggest that the information involved has been misused for purposes of fraud or identity theft as a result of this incident – and no reason to believe that it will be. Finastra has taken steps to help assure that the unauthorized third-party no longer has access to the information and Finastra has no indication that the third-party further copied, retained, or shared any of the information related to this incident. As a result, Finastra believes the risk to individuals whose personal information was involved in this incident is low. Nonetheless, a robust review of the data involved was conducted to identify individuals whose personal information may be contained in the files.

The majority of individuals who will receive notice are associated with or employed by entities that utilize Finastra's financial software solutions and receive support from Finastra related to those services. The data involved includes names, Social Security numbers, and date of birth.

Following this notice, Finastra will begin mailing notification letters to the 679 Washington residents and offering 24 months of complimentary credit monitoring and fraud protection services. A copy of the notification letter is attached. Finastra is also providing a toll-free phone number for the recipients to call with any questions regarding this incident.

To help prevent a similar type of incident from occurring in the future, Finastra has implemented, and continues to evaluate and implement, additional measures to enhance the security of its systems and data.

If you have any questions or need further information regarding this incident, please do not hesitate to contact me.

Norton Rose Fulbright US LLP is a limited liability partnership registered under the laws of Texas.

Washington Attorney General July 3, 2025 Page 2

David Kessler

Respectfully submitted,

David Kessler

Washington Attorney General July 3, 2025 Page 3

Appendix A

Ī	1	Old National Bank	Colin R. Jennings
			colin.jennings@squirepb.com

FINASTRA

Return Mail Processing PO Box 589 Claysburg, PA 16625-0589

June 30, 2025



N5684-L02-0000001 P001 T00001 ********SCH 5-DIGIT 12345 SAMPLE A SAMPLE - L02 US ADULT APT ABC 123 ANY STREET ANYTOWN, ST 12345-6789

RE: Notice of Data Breach

Dear Sample A. Sample:

Finastra, which provides financial software solutions to large financial institutions, recently identified and addressed a cybersecurity incident that involved some of your personal information. This notice explains the incident, the measures we have taken in response, and provides details on proactive steps you may consider to help protect your information.

What Happened? On November 7, 2024, Finastra identified a cybersecurity incident that impacted certain Finastra systems. Once the incident was discovered, Finastra immediately launched an investigation, and leading cybersecurity firms were engaged to assist. We also notified law enforcement and continued to support their investigation.

The investigation revealed that an unauthorized third party accessed a Secure File Transfer Platform (SFTP) at various times between October 31, 2024 and November 8, 2024. Finastra uses this SFTP to provide technical and customer support to its customers related to certain Finastra products. Findings from the investigation indicate that on October 31, 2024, the unauthorized third party obtained certain files from the SFTP. Finastra has taken steps to confirm that the unauthorized third party no longer has access to the data and Finastra has no indication the unauthorized third party further copied, retained, or shared any of the data. We have no reason to suspect your information has or will be misused. As a result, we believe the risk to individuals whose personal information was involved is low. Nonetheless, a robust review of the files involved was conducted to identify individuals whose personal information may be contained in the files.

What Information Was Involved? Our investigation determined that the files contained some of your personal information, such as your name and **[DATA ELEMENTS]**.

What We Are Doing. Finastra immediately reported the incident to, and is working closely with, law enforcement authorities, including the FBI. Additionally, to prevent a similar occurrence in the future, we implemented numerous measures designed to enhance the security of our network, systems, and data. Finastra continues to evaluate additional steps that may be taken to further enhance the security of our environment.

What You Can Do. Please review the "Information About Identity Theft Protection" reference guide, enclosed here, which describes additional steps you may take to help protect yourself, including recommendations from the Federal Trade Commission regarding identity theft protection and details regarding placing a fraud alert or security freeze on your credit file.

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Additionally, while we have no evidence to suggest that your information was targeted or misused for purposes of fraud or identity theft, as a precaution, we are offering you a complimentary 24 month membership of Experian IdentityWorks. This product provides you with superior identity protection and resolution of identity theft, and is completely free to you. Enrolling in this program will not hurt your credit score.

To activate your membership and start monitoring your personal information, please follow the steps below:

- Ensure that you enroll by: October 31, 2025 (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: https://www.experianidworks.com/credit
- Provide your activation code: ABCDEFGHI

For More Information. The security of your personal information is of the utmost importance to us. If you have any questions, please call **833-918-5929** Monday through Friday, between **8am** to **8pm** CST. Be prepared to provide engagement number ENGAGE# as proof of eligibility for the Identity Restoration services by Experian.

Sincerely,

Finastra

ENGAGE# N5684-L02

Information About Identity Theft Protection

Equifax	Experian	TransUnion
Phone: 800-685-1111	Phone: 888-397-3742	Phone: 888-909-8872
P.O. Box 740256	P.O. Box 9554	PO Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19016
equifax.com	experian.com	transunion.com

Free Credit Report. We remind you 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 <u>annualcreditreport.com</u> or call toll free at 877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's (FTC) website at <u>consumer.ftc.gov</u>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents: You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

Security Freeze. Security freezes, also known as credit freezes, restrict access to your credit file, making it harder for identity thieves to open new accounts in your name. You can freeze and unfreeze your credit file for free. You also can get a free freeze for your children who are under 16. And if you are someone's guardian, conservator or have a valid power of attorney, you can get a free freeze for that person, too.

How will these freezes work? Contact all three of the nationwide credit reporting agencies Equifax, Experian, and TransUnion. If you request a freeze online or by phone, the agency must place the freeze within one business day. If you request a lift of the freeze, the agency must lift it within one hour. If you make your request by mail, the agency must place or lift the freeze within three business days after it gets your request. You also can lift the freeze temporarily without a fee.

Don't confuse freezes with locks. They work in a similar way, but locks may have monthly fees. If you want a free freeze guaranteed by federal law, then opt for a freeze, not a lock.

The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible and display your name, current mailing address and date of issue.

For New Mexico residents: You may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

For Colorado and Illinois residents: You may obtain information from the credit reporting agencies and the FTC about security freezes.

Fraud Alerts. A fraud alert tells businesses that check your credit that they should check with you before opening a new account. As of Sept. 18, 2018, when you place a fraud alert, it will last one year, instead of 90 days. Fraud alerts will still be free and identity theft victims can still get an extended fraud alert for seven years.

For Colorado and Illinois residents: You may obtain additional information from the credit reporting agencies and the FTC about fraud alerts.

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ENGAGE# N5684-L02

FTC and State Attorneys General Offices. You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself by contacting the consumer reporting agencies, the FTC, or your state Attorney General. The FTC can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; identitytheft.gov; 877-ID-THEFT (877-438-4338); TTY: 866-653-4261. The FTC also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above.

For Connecticut Residents: You may contact and obtain information from your state attorney general at: Connecticut Attorney General's Office, 55 Elm Street, Hartford, CT 06106, 860-808- 5318, <u>ct.gov/ag</u>

For District of Columbia Residents: You may contact the Office of the Attorney General for the District of Columbia, 441 4th Street NW, Suite 1100 South, Washington, D.C. 20001, <u>oag.dc.gov</u>, 202-442-9828

For Maryland Residents: You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us, 888-743-0023

For New York Residents: You may contact the New York Department of State Division of Consumer Protection, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 800-697-1220, <a href="https://doi.org/10.2016/journal.com/doi.org/1

For North Carolina residents: You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, ncdoi.gov, 877-566-7226.

For Rhode Island Residents: You may contact the Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, <u>riag.ri.gov</u>, 401-274-4400

For Texas Residents: You may contact and obtain information from your state attorney general at: Office of the Texas Attorney General www.texasattorneygeneral.gov/consumer-protection/identitytheft or contact the Identity Theft Hotline at 800-621-0508 (toll-free).

Obtaining a police report. You have the right to obtain any police report filed in the United States in regard to this incident. If you are the victim of fraud or identity theft, you also have the right to file a police report.

For lowa residents: You are advised to report any suspected identity theft to law enforcement or to the lowa Attorney General.

For Massachusetts residents: You have the right to obtain a police report if you are a victim of identity theft. You also have a right to file a police report and obtain a copy of it.

For Oregon residents: You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.

For Rhode Island residents: You have the right to file or obtain a police report regarding this incident. 169 Rhode Island residents were impacted by this incident.

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