



MULLEN  
COUGHLIN<sup>LLC</sup>  
ATTORNEYS AT LAW

Josh Brian  
Office: (267) 930-2405  
Fax: (267) 930-4771  
Email: JBrian@mullen.law

3001 N. Rocky Point Drive East, Suite 200  
Tampa, FL 33607

August 22, 2023

**VIA E-MAIL:**

Office of Consumer Affairs and Business Regulation  
501 Boylston Street, Suite 5100  
Boston, MA 02116  
E-mail: [data.breaches@mass.gov](mailto:data.breaches@mass.gov)

**Re: Supplemental Notice of Data Event**

To Whom It May Concern:

We continue to represent Traditions Bancorp, Inc. (“Traditions Bank”) located at 226 Pauline Drive, York, PA 17402, and write to supplement our April 17, 2023, notice to your office. This notice may be supplemented if new, material facts are learned subsequent to its submission. By providing this notice, Traditions Bank does not waive any rights or defenses regarding the applicability of Massachusetts law, the applicability of the Massachusetts data event notification statute, or personal jurisdiction.

**Nature of the Data Event**

Traditions Bank identified that certain files were downloaded from its computer network without authorization on or about March 3, 2023. After identifying the files, Traditions Bank undertook a review of the files to determine their contents and to whom they were related in order to notify potentially affected individuals. The following categories of information were identified in the reviewed files: name and Social Security number, and deposit and/or loan account number.

**Notice to Massachusetts Residents**

Traditions began providing written notice of this matter on April 17, 2023, and provided additional notices to approximately forty-six (46) Massachusetts residents on or about August 22, 2023. 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 identifying the event, Traditions Bank began an investigation to assess the scope of the event, the security of Traditions Bank systems, and identify potentially affected individuals. Further, Traditions Bank notified federal law enforcement regarding the event. Traditions Bank is evaluating additional safeguards to mitigate risk of reoccurrence of this type of event. Traditions Bank is providing access to credit monitoring services for two (2) years, through Kroll, to individuals whose information was potentially affected by this event, at no cost to these individuals.

Additionally, Traditions Bank is providing potentially affected 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 the relevant financial institution. Traditions Bank is providing individuals with information on how to place a fraud alert and credit 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.

Traditions Bank is providing written notice of this event to relevant state and federal regulators, as necessary.

Please be advised that, pursuant to G.L.c. 93H § 3(b), Traditions Bank maintains written information security policies that comport with the written information security program ("WISP") for the protection of personal information of residents of Massachusetts.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of this matter, please contact us at (267) 930-2405.

Very truly yours,



Josh Brian of  
MULLEN COUGHLIN LLC

JPB/jc2  
Enclosure

# **EXHIBIT A**



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

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
 <<address\_1>>  
 <<address\_2>>  
 <<city>>, <<state\_province>> <<postal\_code>>  
 <<country>>

<<b2b\_text\_1(Subject Line)>>

Dear <<first\_name>> <<last\_name>>:

We write to inform you about an event that may involve your information, our response, and steps you may take if you feel it is appropriate to do so.

**What Happened?** Certain files were copied from our computer network without authorization on or about March 3, 2023. After identifying the files, we undertook a comprehensive review of the files to determine their contents and to whom they were related in order to notify potentially affected individuals, which was completed on July 26, 2023.

**What Information Was Involved?** The reviewed files contained your name and <<b2b\_text\_2 (Data Elements)>>.

**Why Does Traditions Bank Have My Information?** We have your information because you may be a current, former, or prospective customer or employee, or your information was provided by an individual in furtherance of receiving services from Traditions Bank.

**What We Are Doing.** We are notifying you about this matter and providing you an opportunity to enroll in complimentary identity monitoring services. Further, we are evaluating technical security measures, policies, and procedures to mitigate reoccurrence of this type of event.

**What You Can Do.** Receipt of this letter does not mean you are a victim of identity theft or fraud. However, 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 24 months and promptly report incidents of suspected identity theft to the relevant institution. We also recommend you review the “Steps You Can Take To Protect Personal Information” section of this letter. Further, you may enroll in the offered complimentary identity monitoring services. Enrollment instructions for the free monitoring services are on the next page of this letter.

**For More Information.** If you have questions about this matter, please contact our dedicated assistance line at (866) 869-1640, Monday through Friday from 9:00 a.m. to 6:30 p.m. Eastern Time, (excluding U.S. holidays). You may also write to Traditions Bank at [questions@traditions.bank](mailto:questions@traditions.bank) or Traditions Bank, Attn: Director of Regulatory Services, 226 Pauline Drive, York, PA 17402.

We regret any inconvenience or concern this event may have caused.

Sincerely,

Traditions Bank

## STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

### Enroll in Monitoring Services



Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until *<<b2b\_text\_6(activation deadline)>>* to activate your identity monitoring services.

Membership Number: *<<Membership Number s\_n>>*

For more information about Kroll and your Identity Monitoring services, you can visit [info.krollmonitoring.com](http://info.krollmonitoring.com).

You have been provided with access to the following services from Kroll:

#### **Single Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you will have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

#### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

#### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

### 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](http://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:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/help/">https://www.experian.com/help/</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
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 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](http://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](http://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](http://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. NW, 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](http://www.ncdoj.gov).

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