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January 4, 2021

File No. 34181.707

VIA ELECTRONIC SUBMISSION

Attorney General Aaron Frey
Office of the Attorney General
Consumer Protection Division
Security Breach Notification
111 Sewall Street, 6th Floor
Augusta, ME 04330
E-Mail: breach.security@maine.gov

Re: Notification of Data Security Incident

Dear Attorney General Frey:

We represent Citizens Bank of Americus ("CBA"), headquartered in Americus, Georgia, in relation to a recent data security incident involving a third-party service provider, detailed below.

1. Nature of the Incident

On or around November 17, 2020 CBA learned from an unrelated party that a CBA third-party service provider, American Bank Systems ("ABS"), which provides electronic loan administration software, had experienced a data security incident that may have affected CBA customer information. On November 18, 2020, CBA was contacted by ABS and which confirmed that ABS had experienced a data incident on October 22, 2020. CBA immediately began investigating the incident to determine the scope of the incident and whether CBA customer information was actually accessed or acquired without authorization. Through its investigation and aided by information provided by ABS, CBA determined that certain CBA customer information was impacted by the incident, including names, addresses, dates of birth, Social Security numbers, and financial account information. The information affected varied from person-to-person.

CBA ultimately determined that this incident did not occur on or affect the security or integrity of CBA's systems.

During this period, CBA reviewed the list that ABS provided of CBA customers whose information may have been impacted to identify missing address information. CBA

completed its review and provided the address information to ABS on December 15, 2020 to facilitate the consumer notification process.

2. Number of Maine Residents Impacted

ABS, on CBA's behalf, is notifying all potentially impacted CBA customers about this incident, including three (3) Maine residents, via first-class U.S. Mail on December 28–30, 2020. A sample copy of the notification letter sent to the affected individuals is included with this correspondence. ABS is also offering twelve (12) months of credit monitoring services to notified residents.

3. Steps Taken Related to the Incident

CBA has taken the steps described above in response to this incident, including retaining cybersecurity professionals to assist with responding to the incident. Additionally, ABS has represented that it took steps to assess the security of its systems and mitigate the impact of this incident, including resetting passwords and implementing advanced endpoint monitoring.

CBA has also completed the Maine online breach notification form.

4. Contact Information

Please contact me at 971.334.7009 or bryan.thompson@lewisbrisbois.com if you have any questions related to this matter.

Sincerely,



Bryan M. Thompson of
LEWIS BRISBOIS BISGAARD & SMITH LLP

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Encl.: Consumer Notification Letter Template