



Todd Rowe
20 N Wacker, Suite 4120
Chicago, IL 60606
trowe@constangy.com
Direct: 773.558.2363

February 26, 2024

VIA ONLINE SUBMISSION

Attorney General Aaron Frey
Office of the Attorney General
Consumer Protection Division
Security Breach Notification
111 Sewall Street, 6th Floor
Augusta, ME 04330

Re: Notice of Third-Party Data Security Incident

Dear Attorney General Frey:

Constangy, Brooks, Smith & Prophete, LLP represents First Hartford Bancshares, DBA First National Bank of Hartford ("First National"), a banking institution located in Hartford, Alabama.

One of First National's external vendors, Fiserv 2.0 ("Fiserv"), notified First National that it was one of many organizations across the globe affected by the MOVEit software vulnerability. MOVEit Transfer by Progress Software Corp. is a tool used by organizations to transfer files. On May 31, 2023, and again in June 2023, Progress Software Corp. publicly disclosed zero-day vulnerabilities that impacted the MOVEit Transfer tool. These vulnerabilities permitted an unauthorized actor to download files from Fiserv that contained individuals' personal information. On February 14, 2024, First National received the final information for the individuals impacted.

Fiserv notified First National that files were downloaded from Fiserv's MOVEit environment by the unauthorized actor between May 27 and May 31, 2023, and that the downloaded files included personal information of First National's customers. As soon as First National received this notification from Fiserv, First National took steps to review and understand what data was impacted. Based on the review of impacted data, personal information may have been impacted by this incident.

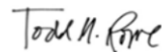
The information affected may have included name, address, dates of birth, Social Security number, First National account number, and other account data.

On or around February 26, 2024, Fiserv notified one (1) Maine resident of the incident on First National's behalf via U.S. First-Class Mail. A sample copy of the notification letter sent to potentially impacted individuals is included with this correspondence.

Upon learning of this incident, Fiserv took immediate steps to launch a comprehensive investigation of the incident. Fiserv has taken appropriate measures to identify and notify the individuals affected. To help prevent something like this from happening again, Fiserv remediated all technical vulnerabilities and patched systems in accordance with the MOVEit software provider's guidelines. Fiserv also mobilized a technical response team to examine the relevant MOVEit Transfer systems and ensured no further vulnerabilities exist. Furthermore, Fiserv has arranged for all impacted individuals to receive complimentary identity monitoring service through Kroll for 24 months (two years). The identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration, as well as access to a call center, should any individual have questions about the incident.

First National remains dedicated to protecting the personal information in its control. If you have any questions or need additional information, please do not hesitate to contact me at 773.558.2363 trowe@constagy.com.

Sincerely,

A handwritten signature in dark ink, appearing to read "Todd N. Rowe". The signature is written in a cursive, slightly slanted style.

Todd Rowe

Constangy, Brooks, Smith & Prophete, LLP

Encl.: Sample Notification Letter
