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Cybersecurity and Data Privacy
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December 27, 2025

VIA ONLINE SUBMISSION
Attorney General Mike Hilgers
Office of the Attorney General
Consumer Protection Division
2115 State Capital
Lincoln, NE 68509
Email: ago.consumer@nebraska.gov

Re: Notice of Data Security Incident

Dear Attorney General Hilgers:

Constangy, Brooks, Smith, & Prophete, LLP represents Ellafi Federal Credit Union ("EFCU") in connection with a recent data security incident described in greater detail below. The purpose of this letter is to notify you of the incident in accordance with Nebraska's data breach notification statute, Neb. Rev. Stat. § 87-803. By providing this notice, EFCU does not waive any rights or defenses regarding the applicability of Nebraska law, the applicability of the Nebraska data event notification statute, or personal jurisdiction.

1. Nature of the Security Incident

On or about November 20, 2025, they learned that certain personal information may have been accessed or acquired without authorization as the result of unusual activity that disrupted access to certain systems first learned of October 14, 2025. EFCU then took immediate steps to secure its network and promptly launched an investigation with the assistance of a privileged digital forensics and incident response experts. EFCU then took steps to promptly notify such individuals of the incident.

The potentially impacted information varies for each individual but may have included individuals' full name, Social Security number, and credit and/or debit card number.

2. Number of Nebraska Residents Affected

On December 23, 2025, EFCU notified approximately 1 Nebraska residents within the potentially affected population via First Class U.S. mail. A sample copy of the notification letter sent to the impacted individuals is included with this correspondence.

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3. Steps Taken Relating to the Incident

As soon as EFCU learned of the unusual network activity, it took steps to secure its systems and launched an investigation to learn more about what happened and what information could have been affected. EFCU implemented additional safeguards to help ensure the security of its systems and to reduce the risk of a similar incident occurring in the future.

EFCU has established a toll-free call center through IDX, a leader in risk mitigation and response, to answer any questions about the incident and address related concerns. In addition, while EFCU is not aware of the misuse of any information as a result of this incident, out of an abundance of caution, EFCU is also providing complimentary identity protection services, including 12 months of complimentary credit monitoring, to notified individuals.

Additionally, EFCU is providing individuals with guidance on how to better protect against identity theft and fraud. EFCU is also providing individuals with information on how to place a fraud alert and security freeze on their 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.

4. Contact Information

If you have any questions or need additional information, please do not hesitate to contact me at mtoldero@constangy.com or (336)-448-8552.

Sincerely,

Matthew Toldero

Matthew Toldero
Partner, Constangy Cyber Team

Attachment: Sample Notification Letter

Ellafi Federal Credit Union
P.O. Box 989728
West Sacramento, CA 95798-9728

<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>
<<Country>>

Enrollment Code: <<ENROLLMENT>>
Enrollment Deadline: March 23, 2026

To Enroll, Scan the QR Code Below:

SCAN ME

Or Visit:
https://app.idx.us/account-creation/protect

December 23, 2025

Subject: Notice of Data Incident

Dear <<First Name>> <<Last Name>>:

We are writing to inform you of a recent data security incident experienced by Ellafi Federal Credit Union ("EFCU") that may have involved your personal information. Please read this letter carefully as it contains information regarding the incident and steps that you can take to help protect your information.

What Happened. On October 14, 2025, EFCU experienced a network disruption and immediately initiated an investigation of the matter. EFCU engaged cybersecurity experts to assist with the process. As a result of the investigation, EFCU determined that certain files may have been accessed and / or acquired without authorization. EFCU then undertook a comprehensive review of those files and, on or about November 20, 2025, learned that some of your personal information was contained within the potentially affected data which is the reason for this notification. Please note that EFCU has no evidence of the misuse, or attempted misuse, or any potentially impacted information.

What Information Was Involved. The information may have included your name together with Social Security number and credit and/or debit card number.

What We Are Doing. As soon as EFCU discovered this incident, EFCU took the steps described above and implemented measures to enhance security and minimize the risk of a similar incident occurring in the future. EFCU also notified the Federal Bureau of Investigation and will cooperate with any resulting investigation that may be necessary to hold the perpetrators accountable. EFCU is also offering you complimentary identity protection services through IDX, a leader in consumer identity protection. These services include 12 months of credit monitoring[1], dark web monitoring, a $1 million identity fraud loss reimbursement policy, and fully managed identity theft recovery services. The deadline to enroll in these services is March 23, 2026.

What You Can Do. You can follow the recommendations on the following page to help protect your personal information. You can also enroll in the complementary services offered to you through IDX by using the enrollment code provided above.

For More Information. Further information about how to protect your personal information appears on the following page. If you have questions or need assistance, please call 1-833-809-4996 Monday through Friday from 9 a.m. to 9 p.m. Eastern Time.

[1]To receive credit monitoring 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.

We take your trust in us and this matter very seriously. We sincerely apologize for any inconvenience this may have caused and want to assure you that protection of your personal information remains our top priority.

Sincerely,

Ellafi Federal Credit Union
524 South Main Street
Middletown, CT 06457

Steps You Can Take to Help Protect Your Personal Information

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (the "FTC").

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting www.annualcreditreport.com, calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You also can contact one of the following three national credit reporting agencies:

Equifax
P.O. Box 105851
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian
P.O. Box 9532
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-916-8800
www.transunion.com

Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at www.annualcreditreport.com.

Security Freeze: You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

Federal Trade Commission
600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov
877-438-4338

California Attorney General
1300 I Street
Sacramento, CA 95814
www.oag.ca.gov/privacy
800-952-5225

Iowa Attorney General
1305 E. Walnut Street
Des Moines, Iowa 50319
www.iowaattorneygeneral.gov
888-777-4590

Kentucky Attorney General
700 Capitol Avenue, Suite 118
Frankfort, Kentucky 40601
www.ag.ky.gov
502-696-5300

Maryland Attorney General
200 St. Paul Place
Baltimore, MD 21202
https://oag.maryland.gov
888-743-0023

New York Attorney General
The Capitol
Albany, NY 12224
800-771-7755
ag.ny.gov

NY Bureau of Internet and Technology
28 Liberty Street
New York, NY 10005
www.dos.ny.gov/consumerprotection/
212.416.8433

NC Attorney General
9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov/protectingconsumers/
877-566-7226

Oregon Attorney General
1162 Court St., NE
Salem, OR 97301
www.doj.state.or.us/consumer-protection
877-877-9392

Rhode Island Attorney General
150 South Main Street
Providence, RI 02903
www.riag.ri.gov
401-274-4400

Washington D.C. Attorney General
400 S 6th Street, NW
Washington, DC 20001
oag.dc.gov/consumer-protection
202-442-9828

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit www.consumer.ftc.gov/sites/default/files/articles/pdf/pdf-0096-fair-credit-reporting-act.pdf.