

Haisten, Beth

From: ConsumerInterest
Sent: Friday, March 14, 2025 8:08 AM
To: Dean, Michael
Cc: Tubbs, Jessica
Subject: Continental Aerospace Technologies, Inc. Data Breach Notification Submission
Attachments: Adult_source.pdf

From: Alabama Attorney General's Office [REDACTED]
Sent: Thursday, March 13, 2025 6:10 PM
To: [REDACTED]
Subject: Data Breach Notification Submission

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Data Breach Notification Submission

Pursuant to the Alabama Data Breach Notification Act of 2018, Act #2018-396 and by clicking the "I Agree" checkbox below, I wish to proceed with compliance of said act.

I Agree

Covered Entity

Entity Name: Continental Aerospace Technologies, Inc.

Entity Type: Private Business

Entity Size: 336

Gross Revenue - Recent Fiscal Year:

Primary Responsible Employee/Agent

Full Name: Jason Goodwin

Employer: Cipriani & Werner, P.C.

Title: Counsel

Work Phone: [REDACTED]

Work Phone Extension:

Mobile Phone:

Address: 450 Sentry Parkway

Address 2: Suite 200

City: Blue Bell

State: Pennsylvania

Zip/Postal: 19422

Email Address: [REDACTED]

Applicable Dates and Notices

The entity was notified by a third party?

Date Breach Occurred From: February 12, 2024

Date Breach Occurred To: February 13, 2024

Date Alabama Residents Notified: March 13, 2025

Total Notified: 1523

Explain (Total Notified): Continental Aero has issued notification to the 1,523 Alabama residents identified as potentially affected.

Form(s) of Notification Sent: Notice provided in writing via first class mail.

Yes, the resident notice included all of the following.

- The date, estimated date, or estimated date range of the breach.
- A description of the sensitive personally identifying information that was acquired by an unauthorized person as part of the breach.
- A general description of the actions taken by a covered entity to restore the security and confidentiality of the personal information involved in the breach.
- A general description of steps an affected individual can take to protect himself or herself from identity theft.
- Information that the individual can use to contact the covered entity to inquire about the breach.

Explain:

On or around February 13, 2024, Continental Aerospace Technologies, Inc., ("Continental") experienced a network disruption that affected their ability to access certain systems. Upon discovery, Continental took immediate steps to respond and secure the network and systems, including the engagement of

third-party forensic specialists to assist in a thorough investigation into the nature and scope of the incident. The investigation revealed that certain parts of the network may have been accessed by an unauthorized actor. Continental immediately worked to identify the potentially affected data to complete a thorough review and identify the types of information at risk. On November 11, 2024, this process identified potential impact to personal information and Continental worked to confirm those whose information was potentially affected and up-to-date contact information. This extensive investigation was completed on or around February 18, 2025, and Continental worked to provided notification to identified individuals.

On March 7, 2025, Continental received its results from a National Change of Address (NCOA) search and confirmed this incident potentially affected 1,523 Alabama residents.

Yes, the entity notified all consumer reporting agencies as described above.

List each agency:

TransUnion, Equifax, Experian

Determination & Scope of Breach and Investigation

Total Alabama Residents Affected: 1523

Explain (Total Affected): On March 7, 2025, a National Change of Address search identified 1,523 Alabama residents to have been potentially affected.

Services Offered: Credit Monitoring and Identity Theft protection services

Services Offered Effective Date: March 13, 2025

Assessment of the Covered Entity

What kind of sensitive personally identifiable information does the entity collect from Alabama residents during its course of business? (Check all that apply)

- Name
- DOB
- SSN or Tax ID
- Driver's license, state-issued ID, passport, military identification, or other unique identification number.
- Financial account numbers, including a bank account number, credit card number, debit card number, in combination with any security code, access code, password, expiration dates, or PIN, that is necessary to access the financial account or to conduct a transaction that will credit or debit the financial account.
- Any information regarding an individual's medical history, mental or physical condition, or medical treatment or diagnosis by a health care professional.
- An individual's health insurance policy number or subscriber identification number and any unique identifier used by a health insurer to identify the individual

For what type of activities is the above information accessed, acquired, maintained, stored, utilized, or communicated by, or on behalf of, the entity?

The Information was maintained in relation to the employment and/or customer relationship with Continental.

What is the entity's cost to implement and maintain the reasonable security measures to protect against a breach of security relative to its resources?

Reasonable Security Measures

- Yes, the entity designated an employee or employees, which may include an owner or manager, to coordinate its security measures to protect against a breach of security.
- Yes, the entity identified internal and external risks of a breach of security.
- Yes, the entity adopted appropriate information safeguards to address identified risks of a breach of security and assessed the effectiveness of such safeguards.
- Yes, the entity retained service providers that are contractually required to maintain appropriate safeguards for sensitive personally identifying information.
- Yes, the entity evaluated and adjusted its security measures to account for changes in circumstances affecting the security of sensitive personally identifying information.
- Yes, the entity kept its management, including its board of directors if any, appropriately informed of the overall status of its security measures; provided, however, that the management of a government entity subject to the Alabama Data Breach Notification Act may be appropriately informed of the status of its security measures through a properly convened execution session under the Open Meetings Act pursuant to Section 36-25A-7, Code of Alabama 1975.

Good Faith and Prompt Investigation

Yes, the entity has begun performing an investigation concerning a breach of security in relation to sensitive personally identifying information.

Explain:

Upon discovery of a potential incident, Continental took immediate steps to respond and secure their network and systems, including the engagement of third-party forensic specialists to assist in a thorough investigation. The investigation revealed that certain data may have been accessed by an unauthorized individual on or around February 12, 2024. Continental immediately undertook a time intensive and thorough review of the affected data to determine the types of information at risk and to whom it relates.

Yes, the investigation includes an assessment of the nature and scope of the breach.

Explain:

Upon discovery of a potential incident, Continental took immediate steps to respond and secure their network and systems, including the engagement of third-party forensic specialists to assist in a thorough investigation into the nature and scope of the incident, including the extent of any potential impact to information.

Yes, the investigation includes identification of any sensitive personally identifying information that may have been involved in the breach and the identity of any individuals to whom that information relates.

Explain:

Upon discovering potential impact to data, Continental worked to identify and gather the data potentially affected to conduct further investigation into the scope of any information affected. This included a comprehensive programmatic and manual review of affected files. Through this review, Continental learned this incident potentially affected individuals' personal information and worked to confirm the specific information potentially affected and the individuals to whom the information relates to provide notification.

Yes, the investigation includes a determination of whether the sensitive personally identifying information has been acquired or is reasonably believed to have been acquired by an unauthorized person, and is reasonably likely to cause substantial harm to the individuals to whom the information relates.

Explain:

Continental's investigation determined that certain information may have been acquired by an unauthorized individual. While Continental has no evidence any information will be or has been misused, Continental provided individuals whose information was at risk with notification.

Yes, the investigation includes identification and implementation of measures to restore the security and confidentiality of the systems compromised in the breach.

Explain:

As part of the investigation and incident response, an advanced endpoint detection and response tool was deployed on Continental systems to monitor and protect against malicious activity.

Yes, the investigation includes indications that the information has been downloaded or copied.

Explain:

The investigation into the incident discovered that certain information was acquired by an unauthorized individual from Continental systems.

Yes, the investigation includes whether the information has been made public.

Explain:

The investigation looked to confirm whether any information was disclosed by the unauthorized actor in relation to this incident.

Signature

Jason Goodwin

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