



March 30, 2023

VIA EMAIL

Attorney General John Formella
Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301
Phone: (603) 271-3643
Fax: (603) 271-2110

Re: Notice of Data Security Incident

Dear Attorney General Formella:

Constangy, Brooks, Smith & Prophete LLP ("Constangy") represents BlueLion, LLC ("BlueLion"), a human resources company based in New England, in conjunction with the recent data security incident described in greater detail below. The purpose of this letter is to notify you of the incident in accordance with the New Hampshire data breach notification statute.

1. Nature of the Security Incident

On or around November 23, 2022, BlueLion became aware of unusual activity within its technological environment. In response, BlueLion took immediate steps to secure its network and initiated an investigation with the assistance of cybersecurity experts. That investigation remains ongoing at this time. However, BlueLion has determined that an unknown actor may have had the potential to access data from the BlueLion environment. While BlueLion is still investigating the scope of this potential access, as well as the individuals potentially impacted, out of an abundance of caution BlueLion is preemptively notifying potentially affected individuals.

2. Type of Information and Number of New Hampshire Residents Notified

The data sets potentially accessible by the malicious actor(s) responsible for this incident included individuals' names, dates of birth, and Social Security numbers. On March 30, 2023, BlueLion notified 43 New Hampshire residents of this data security incident via U.S. First-Class Mail. A sample copy of the notification letter sent to potentially impacted individuals is included with this correspondence.

3. Steps Taken Relating to the Incident

BlueLion has implemented additional security measures in an effort to prevent a similar incident from occurring in the future. Further, as referenced in the sample consumer notification letter, BlueLion

has offered notified individuals 12 months of complimentary services through IDX, which include credit monitoring, dark web monitoring, a \$1 million identity fraud loss reimbursement policy, and fully-managed identity theft recovery services.

4. Contact Information

BlueLion remains dedicated to protecting the personal information in its possession. If you have any questions or need additional information, please do not hesitate to contact me at trowe@constangy.com.

Best regards,

Very truly yours,

Todd Rowe of
CONSTANGY, BROOKS, SMITH & PROPHETE, LLP

Encl: Sample Adult Consumer Notification Letter



10300 SW Greenburg Rd.
Suite 570
Portland, OR 97223

To Enroll, Please Call:
1-800-939-4170
Or Visit:
<https://app.idx.us/account-creation/protect>
Enrollment Code: <<XXXXXXXX>>

<<FirstName>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip>>

March 30, 2023

Subject: Notice of Data Security Incident

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

BlueLion, LLC is writing to inform you of a data security incident that may have affected your information. At BlueLion, we take the privacy and security of your information very seriously. We are contacting you to notify you that this incident occurred and inform you about steps you can take to ensure your information is protected, including enrolling in the complimentary identity protection services we are making available to you.

What Happened? BlueLion is a human resources consulting firm that provides HR services, including payroll and benefits support, to companies throughout the Northeast. On or around November 23, 2022, BlueLion became aware of unusual activity within its technological environment. In response, BlueLion took immediate steps to secure its network and initiated an investigation with the assistance of cybersecurity experts. That investigation remains ongoing at this time. However, BlueLion has determined that an unknown actor may have had the potential to access data from the BlueLion environment. While BlueLion is still investigating the scope of this potential access, as well as the individuals potentially impacted, out of an abundance of caution BlueLion is preemptively notifying potentially affected individuals.

What Information Was Involved? The affected information may have included your

What Are We Doing? As soon as we discovered this incident, we took the steps described above. We have also implemented additional safeguards to help ensure the security of our environment and to reduce the risk of a similar incident occurring in the future.

In addition, we are providing you with information about steps that you can take to help protect your personal information and, out of an abundance of caution, we are offering you <<12/24>> months of identity protection and credit monitoring services at no cost to you through IDX.

The IDX services include credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised. Please note that the deadline to enroll in these services is June 30, 2023.

What Can You Do? We recommend that you review the guidance included with this letter about how to protect your information. You can also contact our dedicated call center with any questions and to enroll in the free services by calling 1-800-939-4170 or by going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided above. Call center representatives are available to assist you Monday through Friday from 9:00 am – 9:00 pm Eastern Time.

For More Information: Further information about how to help protect your information appears on the following page. If you have questions or need assistance, please call . Monday through Friday from 9:00 am – 9:00 pm Eastern Time.

We take your trust in us and this matter very seriously. We are continuing to conduct a thorough review in an effort to determine what happened and what information may be involved. While these efforts are ongoing, you can take advantage of these services. At the conclusion of our investigation, all individuals whose information was involved may receive another letter in the mail with additional details on what happened and the information that may have been affected, if any, and as necessary. **Additional resources you may utilize to help protect your personal information can be found on the attached document.**

Sincerely,

Alison Milioto, Owner
BlueLion LLC

Additional Steps You Can Take to Protect Your 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 (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 <https://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 1000
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 <https://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, and
www.ftc.gov/idtheft
1-877-438-4338

Maryland Attorney General

200 St. Paul Place
Baltimore, MD 21202
oag.state.md.us
1-888-743-0023

New York Attorney General

Bureau of Internet and Technology
Resources
28 Liberty Street
New York, NY 10005
1-212-416-8433

North Carolina Attorney General

9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov
1-877-566-7226

Rhode Island Attorney General

150 South Main Street
Providence, RI 02903
<http://www.riag.ri.gov>
1-401-274-4400

Washington D.C. Attorney General

441 4th Street, NW
Washington, DC 20001
oag.dc.gov
1-202-727-3400

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 <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.