



150 N. Riverside Plaza, Suite 3000, Chicago, IL 60606 • (312) 819-1900

March 6, 2024

**VIA E-MAIL (ATTORNEYGENERAL@DOJ.NH.GOV)**

The Honorable John Formella  
Attorney General of the State of New Hampshire  
Office of the Attorney General  
33 Capitol Street  
Concord, New Hampshire 03301

**Re: *Supplemental Notification of Data Security Incident***

Dear Attorney General Formella:

We represent Classic Residence Management Limited Partnership d/b/a Vi Senior Living ("Vi"), 233 South Wacker Drive, Suite 8400 Chicago, IL 60606, in connection with an incident that may have involved the personal information of twenty-two (22) total New Hampshire residents. Vi is reporting the incident pursuant to N.H. REV. STAT. ANN. § 359-C:20. This notice supplements a letter previously sent to your office. This notice will be supplemented again, if necessary, with any new significant facts discovered subsequent to this submission. While Vi is notifying you of this incident, Vi does not waive any rights or defenses relating to the incident, this notice, or the applicability of New Hampshire law on personal jurisdiction.

**NATURE OF THE INCIDENT**

As previously disclosed, on March 13, 2023, Vi learned that an unauthorized third party gained access to its corporate network. Vi immediately and proactively took each of its independent, community-based IT networks offline. Upon discovery of the incident, Vi, through its legal counsel, engaged several leading IT forensic experts and IT remediation firms to investigate the incident and confirm the security of Vi's computer systems. On April 4, 2023, Vi learned that the unauthorized third-party installed malware that exfiltrated some files from its corporate data server. Vi subsequently obtained a copy of the exfiltrated files and had them reviewed for personal information. On June 2, 2023, Vi provided a preliminary courtesy notification to individuals, with a complimentary offering of of credit and identity theft monitoring, while the file review was ongoing.

On or about July 25, 2023, Vi determined that the files contained personal information. Since July 25, 2023, Vi has been analyzing the results of the review and locating addresses to mail letters. On September 11, 2023, Vi determined the files contained, for most New Hampshire residents,

At this point, Vi is not aware of any fraud or identity theft to any individual as a result of this incident.

### **NOTICE TO THE RESIDENTS**

On June 2, 2023, Vi provided preliminary notice to individuals and provided them with an offer for complimentary credit monitoring. Vi has been notifying individuals in waves, and as of this notification, Vi has notified twenty-two (22) New Hampshire residents by letter from September 29, 2023 through March 6, 2024. The notification letter includes an offer for complimentary credit monitoring and identity theft protection. Enclosed is a copy of the letter being sent to the New Hampshire residents via first-class United States mail.

### **STEPS TAKEN RELATING TO THE INCIDENT**

Upon learning of the incident, Vi promptly prevented further unauthorized access to the system. It also notified law enforcement and engaged several leading IT forensic experts and IT remediation firms to investigate and confirm the security of its computer systems. Vi is undertaking efforts to reduce the risk of a similar incident occurring in the future, including enhancing its technical security measures. Finally, as discussed above, Vi is notifying the potentially involved individuals, providing free credit monitoring services, and providing individuals with information on how they can protect themselves against fraudulent activity and identity theft.

### **CONTACT INFORMATION**

Please contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,

Bruce Radke

Enclosure



Redefining  
SENIOR  
LIVING

<<Date>> (Format: Month Day, Year)

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country>>

**RE: NOTICE OF DATA BREACH**

Dear <<first\_name>>:

At Vi Living, we understand and respect the private nature of the personal information that you share with us. This letter provides you important facts about the unauthorized access of Vi Living's information technology (IT) network that occurred in March of 2023. We also share with you important information about: (1) steps that Vi Living has taken to date to investigate and contain the incident, and (2) steps you can take to protect yourself from the potential misuse of your personal information.

**What Happened?** On March 13, 2023, we learned that an unauthorized third-party gained access to Vi's corporate office network and data server. Once alerted of this access, we immediately and proactively took each of Vi Senior Living's community-based IT networks offline. We reported the incident to law enforcement and cooperated with their separate investigation. Simultaneously, we engaged several leading IT forensic experts and IT remediation firms to confirm the security of our computer systems and the integrity of our IT network infrastructure. During our forensic investigation, we learned that some files from Vi's corporate office data server were accessed by the unauthorized third-party. On July 25, 2023, our investigation determined that the files contained some of your personal information.

**What Information Was Involved?** The information contained in the files varied by individual but may include your <<b2b\_text\_1(name, data elements)>>.

**What We Are Doing.** In addition to investigating the incident, working with law enforcement, and taking steps to help prevent a similar incident from occurring in the future, we are offering a complimentary one-year membership of Experian IdentityWorks Credit Plus 3B. You can contact Experian immediately regarding any fraud issues, and you have access to the features described on the following page once you enroll in Experian IdentityWorks.

**What You Can Do.** You can find more information on steps to protect yourself against identity theft or fraud in the enclosed *Additional Important Information* sheet. While we are not aware of any fraud or misuse of your information, we encourage you to contact Experian to enroll in the free identity protection services using the enrollment information provided below. Please note the deadline to enroll is .

**For More Information.** For further information and assistance, please call the dedicated call center we have engaged to address your questions. The call center can be reached at 866-547-1476, from 8:00 A.M. – 5:30 P.M. Central Time, Monday through Friday, excluding major U.S. holidays.

We value the trust you place in us to safeguard the personal information that you have shared with Vi Living. Please note that, as of today's date, Vi Living does not know of any identity theft or fraud to individual persons as a result of this March 2023 IT network access incident. Nevertheless, we sincerely apologize for the inconveniences, concerns, or other impact that the unauthorized access of Vi Living's IT network might cause you.

Sincerely,

Tomek Koszylko  
Privacy Officer

## ACTIVATING YOUR COMPLIMENTARY CREDIT MONITORING

To help protect your identity, we are offering a **complimentary** membership of Experian IdentityWorks<sup>SM</sup> Credit Plus 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

### Activate IdentityWorks Credit Plus 3B Now in Three Easy Steps

1. ENROLL by: <<b2b\_text\_6(enrollment deadline)>> (Your code will not work after this date.)
2. Visit the **Experian IdentityWorks website** to enroll: **[www.experianidworks.com/3bplus](http://www.experianidworks.com/3bplus)**
3. PROVIDE the **Activation Code**: <<activation code s\_n>>
4. PROVIDE the necessary information when prompted

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-890-9332. Be prepared to provide engagement number <<b2b\_text\_2(engagement number)>> as proof of eligibility for the identity restoration services by Experian.

#### Additional details regarding your

#### Experian IdentityWorks Credit Plus 3B Membership:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit Plus 3B.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.\*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Internet Surveillance:** Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance\*\*:** Provides coverage for certain costs and unauthorized electronic fund transfers.

**Activate your membership today at [www.experianidworks.com/3bplus](http://www.experianidworks.com/3bplus) or call 877-890-9332 to register with the activation code above.**

**What you can do to protect your information:** There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration) for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-890-9332.

\* Offline members will be eligible to call for additional reports quarterly after enrolling.

\*\* The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

### Additional Important Information

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring 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 should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft. For more information and to contact the FTC, please visit [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft) or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

**Credit Reports:** You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting [www.annualcreditreport.com](http://www.annualcreditreport.com), by 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 can print a copy of the request form at <https://www.annualcreditreport.com/manualRequestForm.action>.

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is as follows:

Equifax  
1-866-349-5191  
[www.equifax.com](http://www.equifax.com)  
P.O. Box 740241  
Atlanta, GA 30374

Experian  
1-888-397-3742  
[www.experian.com](http://www.experian.com)  
P.O. Box 2002  
Allen, TX 75013

TransUnion  
1-800-888-4213  
[www.transunion.com](http://www.transunion.com)  
P.O. Box 2000  
Chester, PA 19016

**Fraud Alerts:** You may want to consider placing a fraud alert on your credit report. A fraud alert is free and will stay on your credit report for one (1) year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at [www.annualcreditreport.com](http://www.annualcreditreport.com).

**Credit and Security Freezes:** You may have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:

Equifax Security Freeze  
1-888-298-0045  
[www.equifax.com](http://www.equifax.com)  
P.O. Box 105788  
Atlanta, GA 30348

Experian Security Freeze  
1-888-397-3742  
[www.experian.com](http://www.experian.com)  
P.O. Box 9554  
Allen, TX 75013

TransUnion Security Freeze  
1-888-909-8872  
[www.transunion.com](http://www.transunion.com)  
P.O. Box 160  
Woodlyn, PA 19094

**Iowa Residents:** Iowa residents can contact the Office of the Attorney general to obtain information about steps to take to avoid identity theft from the Iowa Attorney General's office at: Office of the Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines IA 50319, 515-281-5164.

**Maryland Residents:** Maryland residents can contact the Office of the Attorney General to obtain information about steps you can take to avoid identity theft from the Maryland Attorney General's office at: Office of the Attorney General, 200 St. Paul Place, Baltimore, MD 21202, (888) 743-0023, <http://www.marylandattorneygeneral.gov/>.

**New Mexico:** Individuals have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting [https://files.consumerfinance.gov/f/documents/bcfrp\\_consumer-rights-summary\\_2018-09.pdf](https://files.consumerfinance.gov/f/documents/bcfrp_consumer-rights-summary_2018-09.pdf), or by requesting information in writing from the Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

**New York State Residents:** New York residents can obtain information about preventing identity theft from the New York Attorney General's Office at: Office of the Attorney General for the State of New York, Bureau of Consumer Frauds & Protection, The Capitol, Albany, New York 12224-0341; <https://ag.ny.gov/consumer-frauds/identity-theft>; (800) 771-7755.

**North Carolina Residents:** North Carolina residents can obtain information about preventing identity theft from the North Carolina Attorney General's Office at: North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001; 877-5-NO-SCAM (Toll-free within North Carolina); 919-716-6000; [www.ncdoj.gov](http://www.ncdoj.gov).

**Oregon Residents:** You are advised to report any suspected identity theft to law enforcement, including the Federal Trade Commission and the Oregon Attorney General. For more information on security locks, you can visit the Oregon Department of Consumer and Business Services website at [dfr.oregon.gov/financial/protect/Pages/stolen-identity.aspx](http://dfr.oregon.gov/financial/protect/Pages/stolen-identity.aspx) and click "Place a credit freeze."

**Rhode Island Residents:** We believe that this incident affected XX Rhode Island residents. Rhode Island residents can contact the Office of the Attorney general at: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, (401) 274-4400, [www.riag.ri.gov](http://www.riag.ri.gov). You have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

**Vermont Residents:** If you do not have internet access but would like to learn more about how to place a security freeze on your credit report, contact the Vermont Attorney General's Office at 802-656-3183 (800-649-2424 toll free in Vermont only).