

Suite 800 1919 Pennsylvania Avenue, NW Washington, DC 20006-3401

Alex Reynolds 202-973-4251 telephone alexreynolds@dwt.com

June 26, 2020

Consumer Protection & Antitrust Bureau 33 Capitol Street Concord, NH 03301

RE: Notice Concerning Security Breach

To Whom It May Concern:

We are writing to notify you that FEDITC, LLC discovered that personal information belonging to one (1) resident of your state may have been accessed or acquired without authorization during a security incident.

On January 6, 2020, FEDITC was contacted by the U.S. Secret Service ("Secret Service"), which claimed that a FEDITC laptop was in possession of an individual who did not have authorization to have it or access the information on it. Based on limited information shared with FEDITC by the Secret Service and FEDITC's internal investigation, FEDITC determined that, to the best of its knowledge, the laptop contained the personal information of FEDITC employees who were employed from 2015-2017.

FEDITC moved quickly to provide potentially affected employees with informal notification on January 15, 2020. FEDITC also began an investigation to try to determine what happened and what personal information may have been affected with greater certainty. We plan to notify all potentially affected individuals on June 29, 2020. From the time FEDITC was first notified, it has worked to implement additional security measures to help protect its systems from future unauthorized users.

Name, Social Security Number, and date of birth may have been disclosed as a result of this security incident. Out of an abundance of caution, written notice will be sent to the most recent address for the resident of your state. Enclosed is a copy of one of the notices that will be provided to the affected resident.

ATTN: Security Breach Notification

June 26, 2020

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Please be assured that we are taking this matter very seriously. Please do not hesitate to contact the undersigned if you have any questions or require any further information.

Sincerely,

Davis Wright Tremaine LLP

Alexander Reynolds

Counsel to FEDITC LLC



FEDITC LLC 4415 Piedras Dr. W. Suite 100, San Antonio, Texas 78228

06/29/2020

FEDITC, LLC 4415 Piedras Dr. W, Suite 100 San Antonio, Texas 78228

NOTICE OF DATA BREACH

Dear <<FIRST NAME>> <<LAST NAME>>:,

We are writing to notify you that FEDITC, LLC has experienced a security incident that involves your personal information. This is a formal notification of the incident; you may have already received a notification from us that we sent as a preventative measure. Possibly affected employees would have been employed by FEDITC during the period of 2015 to 2017.

<u>What Happened?</u> An unauthorized individual acquired a FEDITC laptop containing personal information of FEDITC employees who were employed from 2015 - 2017. FEDITC was alerted to that unauthorized acquisition on January 6, 2020, at which time it began an investigation to determine who may have been affected. FEDITC is reaching out to you because we have determined that your personal information may have been on that laptop and therefore potentially accessed by the unauthorized individual.

<u>What Information Was Invloved?</u> The affected personal information may have included your name, Social Security Number and date of birth.

<u>What Are We Doing?</u> In response to these events, we hired a reputable third-party service provider to help with investigation and remediation of the incident and to mitigate the possibility of future incidents. We also sent preliminary notifications to individuals who may have been affected according to our preliminary investigation.

We have arranged to have NortonLifeLock protect your identity for 12 months at no cost to you. Please see the following page to learn more about how to take advantage of this offer.

<u>What Can You Do?</u> Please review the "Further Steps and Contact List" information on the reverse side of this letter which identifies additional steps to take to protect your information. If you have additional questions or concerns about this incident, please call Mrs. Holly Wood, Facility Security Officer, at 210-610-3904.

We take all privacy and security incidents seriously. We deeply regret any inconvenience this may cause you and thank you for your understanding. We will **NOT** send you any electronic communications regarding this incident and ask you to disclose any personal information.

Contact: FEDITC, LLC Holly Wood, Facility Security Officer (T) (210) 610-3904 or (F) (210) 946-6101 security@feditc.com



FEDITC LLC 4415 Piedras Dr. W. Suite 100, San Antonio, Texas 78228

Dear <<FIRST NAME>> <<LAST NAME>>:

FEDITC, LLC has retained **NortonLifeLock** to provide one year of complimentary **LifeLock Defender™ Choice** identity theft protection.

To activate your membership online and get protection at no cost to you:

- 1. In your web browser, go directly to **www.LifeLock.com**. Click on the yellow "**START MEMBERSHIP"** button (*do not attempt registration from a link presented by a search engine*).
- 2. You will be taken to another page where, <u>below the FOUR protection plan boxes</u>, you may enter the **Promo Code:** and click the **"APPLY"** button.
- 3. On the next screen, enter your **Member ID**: << MEMBER ID>> and click the "APPLY" button.
- 4. Your complimentary offer is presented. Click the red "START YOUR MEMBERSHIP" button.
- 5. Once enrollment is completed, you will receive a confirmation email (*be sure to <u>follow ALL directions</u> in this email*).

Alternatively, to activate your membership over the phone, please call: 1-800-899-0180

You will have until September 30, 2020 to enroll in this service.

Once you have completed the LifeLock enrollment process, the service will be in effect. Your **LifeLock Defender™ Choice** membership includes:

- ✓ Primary Identity Alert System[†]
- √ 24/7 Live Member Support
- ✓ Dark Web Monitoring**
- ✓ Norton[™] Security Deluxe² (90 Day Free Subscription)
- ✓ Stolen Funds Reimbursement up to \$25,000 ^{†††}
- ✓ Personal Expense Compensation up to \$25,000 †††
- ✓ Coverage for Lawyers and Experts up to \$1 million ##
- ✓ U.S.-Based Identity Restoration Team
- ✓ One-Bureau Credit Monitoring^{1**}
- ✓ Annual One-Bureau Credit Report & Credit Score^{1**}
 The credit score provided is a VantageScore 3.0 credit score based on Equifax data. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your creditworthiness.

No one can prevent all identity theft or cybercrime. † LifeLock does not monitor all transactions at all businesses.

²Norton Security Online provides protection against viruses, spyware, malware, and other online threats for up to 5 PCs, Macs, Android devices. Norton account features not supported in this edition of Norton Security Online. As a result, some mobile features for Android are not available such as anti-theft and mobile contacts backup. iOS is not supported.

¹ If your plan includes credit reports, scores, and/or credit monitoring features ("Credit Features"), two requirements must be met to receive said features: (i) your identity must be successfully verified with Equifax; and (ii) Equifax must be able to locate your credit file and it must contain sufficient credit history information. IF EITHER OF THE FOREGOING REQUIREMENTS ARE NOT MET YOU WILL NOT RECEIVE CREDIT FEATURES FROM ANY BUREAU. If your plan also includes Credit Features from Experian and/or TransUnion, the above verification process must also be successfully completed with Experian and/or TransUnion, as applicable. If verification is successfully completed with Equifax, but not with Experian and/or TransUnion, as applicable, you will not receive Credit Features from such bureau(s) until the verification process is successfully completed and until then you will only receive Credit Features from Equifax. Any credit monitoring from Experian and TransUnion will take several days to begin after your successful plan enrollment.

^{**} These features are not enabled upon enrollment. Member must take action to get their protection.

^{**} Reimbursement and Expense Compensation, each with limits of up to \$25,000 for Defender Choice. And up to \$1 million for coverage for lawyers and experts if needed, for all plans. Benefits provided by Master Policy issued by United Specialty Insurance Company (State National Insurance Company, Inc. for NY State members). Policy terms, conditions and exclusions at: LifeLock.com/legal.



FEDITC LLC 4415 Piedras Dr. W. Suite 100, San Antonio, Texas 78228

FURTHER STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION AND CONTACT LIST

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 http://www.annualcreditreport.com/, calling toll-free 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 this form at https://www.annualcreditreport.com/cra/requestformfinal.pdf. You also can contact each one of the three national credit reporting agencies (contact information below).

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 90 days. 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 http://www.annualcreditreport.com.

Security Freeze: A security freeze 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. Under federal law, you may not be charged to place or remove a credit freeze.

Additional Free Resources on Identity Theft: You can obtain information from the consumer reporting agencies, FTC (https://www.identitytheft.gov/) or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the Federal Trade Commission or to the Attorney General in your state. Residents of Maryland, North Carolina, and Rhode Island can obtain more information from their Attorneys General using the contact information below.

Federal Trade Commission	Maryland A
600 Pennsylvania Ave, NW	General
Washington, DC 20580	200 St. Pau
consumer.ftc.gov, and	Baltimore,
www.ftc.gov/idtheft	oag.state.m
1-877-438-4338	1-888-743-

ryland Attorney	North Carolina
neral	Attorney Genera
St. Paul Place	9001 Mail Servic
timore, MD 21202	Center
s.state.md.us	Raleigh, NC 2769
88-743-0023	ncdoj.gov
	1-877-566-7226

th Carolina	Rhode Island	
rney General	Attorney General	
1 Mail Service	150 South Main Street	
ter	Providence, RI 02903	
igh, NC 27699	http://www.riag.ri.gov	
oj.gov	401-274-4400	
7 566 7226		



FEDITC LLC 4415 Piedras Dr. W. Suite 100, San Antonio, Texas 78228

Contact Information for Credit Reporting Agencies:

	Equifax	Experian	TransUnion
To obtain	P.O. Box 740241	P.O. Box 4500	P.O. Box 1000
a copy of	Atlanta, GA 30374	Allen, TX 75013	Chester, PA 19016
your	(866) 349-5191	(888) 397-3742	(800) 888-4213
credit	www.equifax.com	www.experian.com	www.transunion.com
report			
To obtain	PO Box 105788	PO Box 9554	P.O. Box 2000
a security	Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19016
freeze	(800) 685-1111	(888) 397-3742	(888) 909-8872
	www.equifax.com/personal/	www.experian.com/freeze/cen	www.transunion.com/credit-
	<u>credit-report-services</u>	ter.html	<u>freeze</u>
To place a	P.O. Box 105069	P.O. Box 2002	P.O. Box 2000
fraud	Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19016
alert	(888) 766-0008	(888) 397-3742	(800) 680-7289
	www.equifax.com/personal/	www.experian.com/fraud/cent	www.transunion.com/fraud-
	<u>credit-report-services</u>	<u>er.html</u>	victim-resource/place-fraud-alert

Contact: FEDITC, LLC Holly Wood, Facility Security Officer (T) (210) 610-3904 or (F) (210) 946-6101 security@feditc.com