

Lauren D. Godfrey One PPG Place 28th Floor Pittsburgh, PA 15222 Lauren.Godfrey@lewisbrisbois.com Direct: 412.567.5113

May 11, 2022

VIA EMAIL Attorney General John Formella Office of the Attorney General Consumer Protection Bureau 33 Capitol Street Concord, NH 03301 DOJ-CPB@doj.nh.gov

## Re: Notice of Data Security Incident

Dear Attorney General Formella:

We represent GCF Valuation, Inc. ("GCF"), a provider of SBA-compliant business valuations and appraisals. GCF is headquartered in Lutz, Florida. This letter is being sent because the personal information of one (1) New Hampshire resident may have been affected by a recent data security incident. The incident may have included unauthorized access to personal information such as name and Social Security number.

On October 16, 2021, GCF detected unusual activity within its digital network. Upon discovering this activity, GCF immediately engaged a team of cybersecurity experts to secure its digital environment and conduct a forensic investigation to determine the method of initial compromise and access, the scope of the incident, what systems were impacted and whether any personal information may have been accessed or exfiltrated as a result of the incident. GCF enlisted additional independent experts to review accessed data for the existence of personal information. On April 12, 2022, GCF concluded its review and determined that an unauthorized actor may have accessed the personal information of certain individuals. GCF then worked diligently to identify address information for all affected individuals, which was completed on May 4, 2022.

On May 11, 2022, GCF notified the affected New Hampshire residents via the attached sample letter through notification vendor IDX. Although GCF has no evidence that personal information has been misused, GCF is offering 12 months of credit monitoring and identity protection services to affected individuals. GCF has taken measures to enhance the security of its network to minimize the likelihood that an event like this might occur again in the future, and it has reported this incident to the Federal Bureau of Investigation in hopes of holding the perpetrator(s) accountable.

Please contact me at Lauren.Godfrey@lewisbrisbois.com should you have any questions.

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4867-2980-8415.1

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Sincerely,

Lauren D. Godfrey

Lauren Godfrey, CIPP (US/E) of LEWIS BRISBOIS BISGAARD & SMITH LLP

Encl: Sample Consumer Notification Letter



GCF Valuation 10300 SW Greenburg Rd. Suite 570 Portland, OR 97223 To Enroll, Please Call: 1-800-939-4170 Or Visit: <u>https://app.idx.us/account-</u> <u>creation/protect</u> Enrollment Code: <<XXXXXXX>>

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

May 10, 2022

## Re: Notice of Data <<<u>Security Incident/Breach</u>>>

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

We are writing to inform you of a recent cyber incident experienced by GCF Valuation, Inc. ("GCF") that may have involved your personal information. GCF takes the privacy and security of your information very seriously, which is why we are informing you of the incident and offering you complimentary credit monitoring and identity protection services. At this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering.

**What Happened:** On October 16, 2021, GCF detected suspicious activity within its network. We immediately took steps to secure our network and began an internal investigation with the help of cybersecurity experts. Furthermore, we reported the incident to the Federal Bureau of Investigation ("FBI"), in hopes of holding the perpetrator(s) accountable. As part of its investigation, GCF undertook a thorough review and analysis of the information involved in the incident. On April 12, 2022, GCF determined that your personal information was located in the files that may have been accessed or acquired without authorization. Immediately thereafter, GCF worked diligently to identify address information for all impacted individuals, which was completed on May 4, 2022.

What Information Was Involved: The incident involved your name and your <<VARIABLE TEXT>>.

What We Are Doing: As soon as we discovered the incident, we took the steps described above. In addition, we have implemented additional measures to enhance the security of our digital environment in an effort to minimize the likelihood of a similar event from occurring in the future. As noted above, we also reported the incident to law enforcement to attempt to hold the perpetrators responsible, if possible.

We are providing you with steps that you can take to help protect your personal information, and, as an added precaution, we are offering you complimentary identity protection services through **IDX**, a leader in risk mitigation and response. These services include <<12 / 24>> months of credit monitoring, dark web monitoring, a \$1,000,000 identity fraud loss reimbursement policy, and fully-managed identity theft recovery services.

**What You Can Do:** We encourage you to follow the recommendations on the next page to help protect your information. We also encourage you to enroll in the complimentary services offered by going to <u>https://app.idx.us/account-creation/protect</u> or calling 1-800-939-4170 and using the enrollment code provided above. Please note that the deadline to enroll is August 10, 2022.

For More Information: If you have any questions regarding the incident or would like assistance with enrolling in the services offered, please call 1-800-939-4170 between 9 am - 9 pm Eastern Time.

We remain dedicated to protecting your personal information and deeply regret any concern or inconvenience this may cause you.

Sincerely,

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Troy Anderson Vice President of Operations GCF Valuation, Inc.

## Steps You Can Take to Further 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 <u>http://www.annualcreditreport.com/</u>, 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 also can contact one of the following three national credit reporting agencies:

TransUnion	Experian	Equifax
P.O. Box 1000	P.O. Box 2002	P.O. Box 740241
Chester, PA 19016	Allen, TX 75013	Atlanta, GA 30374
1-800-916-8800	1-888-397-3742	1-888-548-7878
www.transunion.com	www.experian.com	www.equifax.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 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 <u>http://www.annualcreditreport.com</u>.

**Security Freeze:** Under U.S. law, 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	Maryland Attorney General	North Carolina Attorney General	Rhode Island Attorney General
600 Pennsylvania Ave, NW	200 St. Paul Place	9001 Mail Service Center	150 South Main Street
Washington, DC 20580	Baltimore, MD 21202	Raleigh, NC 27699	Providence, RI 02903
www.consumer.ftc.gov,	www.oag.state.md.us	www.ncdoj.gov	<u>www.riag.ri.gov</u>
and	1-888-743-0023	1-877-566-7226	1-401-274-4400
www.ftc.gov/idtheft			

1-877-438-4338

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 <u>http://files.consumerfinance.gov/f/201504 cfpb summary your-rights-under-fcra.pdf</u>.