BakerHostetler

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May 8, 2023

VIA EMAIL (DOJ-CPB@DOH.NH.GOV)

Attorney General John Formella Office of the Attorney General 33 Capitol Street Concord, NH 03301

Re: Incident Notification

Dear Sir or Madam:

We are writing on behalf of our client, GoHenry, Ltd., to notify you of a security incident involving 17 New Hampshire residents. GoHenry is a U.K.-based company that provides a prepaid debit card available for minors. GoHenry has customers in the United Kingdom and United States.

GoHenry recently concluded an investigation into an incident involving unauthorized access to certain customers' user accounts. Upon discovering the incident, GoHenry immediately took steps to confirm that its platform was secure and conducted a thorough investigation. The investigation determined that there was unauthorized access to certain customer profiles between September 19, 2022 and October 13, 2022. The activity observed was consistent with credential stuffing, and there was no evidence indicating that GoHenry's customer databases or network were accessed by any unauthorized individuals. GoHenry completed a comprehensive review of the actions taken by the unauthorized actor, and on April 3, 2023, GoHenry confirmed that the unauthorized actor accessed the personal information of seventeen New Hampshire residents through their

Beginning on May 8, 2023, GoHenry will mail notification letters via United States Postal Service First-Class mail to the New Hampshire residents. A copy of the notification letter is enclosed. GoHenry reported the incident to law enforcement and established a dedicated phone number for notification recipients to call to obtain more information regarding the incident.

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To help prevent a similar incident from occurring, GoHenry is taking steps to further enhance its existing security measures.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

Benjamin D. Wanger Counsel

Enclosures



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

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To the Parent or Guardian of:
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<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>
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Dear Parent or Guardian of <<first_name>>:

GoHenry is committed to protecting the privacy and security of the information we maintain. GoHenry is writing to inform you of an incident that involved some of your child's information. This notice explains the incident, the measures we have taken, and some additional steps you may consider taking in response.

We recently concluded an investigation into an incident involving potential unauthorized access to your child's GoHenry account. Upon discovering the incident, we immediately took steps to confirm that our platform was secure and conducted a thorough investigation. The investigation determined that there was unauthorized access to certain customer profiles between September 19, 2022 and October 13, 2022. We completed a comprehensive review of the actions taken by the unauthorized actor, and on April 3, 2023, we confirmed that the unauthorized actor accessed your child's <
b2b_text_1 (data elements)>>.

We take this incident very seriously. To help prevent a similar incident from occurring in the future, we are taking steps to further enhance our existing security measures and will be reissuing your child's GoHenry card, if we have not already done so. For more information about identity theft prevention and additional steps you may consider taking in response, please see the pages that follow this letter. In addition, please ensure that you have notifications turned on for our application in your phone settings to provide immediate alerts of spend activity and regularly review the security and strength of your passwords.

If you have any questions regarding this notice, please call << Kroll Call Center Number>>, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time, excluding certain major U.S. holidays.

Sincerely,

Dean Brauer President | GoHenry Inc.

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your child's account statements and free credit reports for any unauthorized activity. If you identify fraudulent transactions using your child's GoHenry account, please call GoHenry's member support line at (877) 372-6466.

Parents or guardians may request a copy of their child's or ward's credit information by contacting the three credit reporting bureaus. Contact information for the three nationwide credit reporting companies is as follows:

- Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-888-378-4329
- Experian, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- TransUnion, PO Box 1000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe your child is the victim of identity theft or have reason to believe your child's personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your child's records. Contact information for the Federal Trade Commission is as follows:

• Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.identitytheft.gov.

Fraud Alerts: There are two types of fraud alerts you can place on your child's credit report to put your child's creditors on notice that your child may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your child's credit report if you suspect your child has been, or is about to be, a victim of identity theft. An initial fraud alert stays on your child's credit report for one year. You may have an extended alert placed on your child's credit report if your child has already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your child's credit report for seven years. You can place a fraud alert on your child's credit report by contacting any of the three national credit reporting agencies.

Credit Freezes: You have the right to put a credit freeze, also known as a security freeze, on your child's credit file, free of charge, so that no new credit can be opened in your child's name without the use of a PIN number that is issued to you when you initiate a freeze. A security freeze is designed to prevent potential credit grantors from accessing your child's credit report without your consent. If you place a security freeze, potential creditors and other third parties will not be able to get access to your child's credit report unless you temporarily lift the freeze. Therefore, using a security freeze may delay your child's ability to obtain credit. There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your child's credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- Experian Security Freeze, PO Box 9554, Allen, TX 75013, www.experian.com
- TransUnion Security Freeze, PO Box 160, Woodlyn, PA 19094, www.transunion.com
- Equifax Security Freeze, PO Box 105788, Atlanta, GA 30348, www.equifax.com

To request a security freeze, you will need to provide the following information:

- 1. Your child's full name (including middle initial as well as Jr., Sr., II, III, etc.)
- 2. Your child's Social Security number
- 3. Your child's date of birth
- 4. If you have moved in the past five years, provide the addresses where your child has lived over the prior five years
- 5. Proof of current address such as a current utility bill or telephone bill
- 6. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.)
- 7. If your child is a victim of identity theft, include a copy of the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

The credit reporting agencies have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to place a security freeze on your child's credit report. The credit bureaus must also send written confirmation to you within five business days and provide you with a unique personal identification number ("PIN") or password or both that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your child's credit report, or to lift a security freeze for a specified period of time, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to the credit reporting agencies and include proper identification (your child's name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze as well as the identity of those entities or individuals you would like to receive your child's credit report or the specific period of time you want the credit report available. The credit reporting agencies have one hour after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to each of the three credit bureaus and include proper identification (your child's name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have one hour after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to remove the security freeze.

Registered office: Stirley House, Ampress Lane, Lymington, Hampshire, SO41 8LW. Registered in England. Company No: 06146113. Tel: 0330 100 7676.

Additional information for residents of the following states:

If your child is a Connecticut resident: You may contact and obtain information from your state attorney general at: *Connecticut Attorney General's Office*, 165 Capitol Ave, Hartford, CT 06106, 1-860-808-5318, <u>www.ct.gov/ag</u>.

If your child is a District of Columbia resident: You may contact and obtain information from your attorney general at: Office of the Attorney General for the District of Columbia, 441 4th Street NW, Washington, DC 20001, 1-202-727-3400, www.oag.dc.gov.

If your child is a Maryland resident: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us.

If your child is a New York resident: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection,* One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, http://www.dos.ny.gov/consumerprotection; and *New York State Office of the Attorney General,* The Capitol, Albany, NY 12224-0341, 1-800-771-7755, https://ag.ny.gov.

If your child is a North Carolina resident: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov.

If your child is a Rhode Island resident: This incident involves [13] Rhode Island residents. Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: *Rhode Island Attorney General's Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov.

If your child is a West Virginia resident: You have the right to ask that nationwide consumer reporting agencies place "fraud alerts" in your file to let potential creditors and others know that you may be a victim of identity theft, as described above. You also have a right to place a security freeze on your credit report, as described above.

A Summary of Your Rights Under the Fair Credit Reporting Act: The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Here is a summary of your major rights under FCRA. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information.
- Consumer reporting agencies may not report outdated negative information.
- Access to your file is limited.
- You must give your consent for reports to be provided to employers.
- You may limit "prescreened" offers of credit and insurance you get based on information in your credit report.
- You have a right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization.
- You may seek damages from violators.
- Identity theft victims and active-duty military personnel have additional rights.