

RECEIVED

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CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302 Wayne, PA 19087

January 26, 2018

# INTENDED FOR ADDRESSEE(S) ONLY

# VIA U.S. MAIL

Attorney General Gordon J. MacDonald Office of the New Hampshire Attorney General Attn: Security Breach Notification 33 Capitol Street Concord, NH 03301

Re: Notice of Data Event

Dear Attorney General MacDonald:

We represent Goldleaf Partners Services, Inc., 8009 34<sup>th</sup> Avenue S, Suite 320, Bloomington, MN 55425 ("Goldleaf"), and are writing to notify your office of an incident that may affect the security of personal information relating to certain New Hampshire residents. By providing this notice, Goldleaf does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

## Nature of the Data Event

On or about October 31, 2017, Goldleaf discovered that it had become the target of a phishing email campaign that compromised an employee's email credentials. Goldleaf immediately took steps to secure the employee's email account and launched an in-depth investigation to determine whether any sensitive information was accessed or acquired.

Goldleaf subsequently determined, with the help of outside computer forensic investigators, that an unknown actor had gained access to the Goldleaf employee's email account. On December 1, 2017, Goldleaf determined, after a lengthy programmatic and manual review of the contents of the email account, the types of protected information contained in the email account and to which individuals the information relates, and immediately launched a review of its files to ascertain address information for the impacted individuals. The contents of the email accounts largely contained information related to plan participants in retirement plans overseen by Goldleaf. On

Attorney General Gordon J. MacDonald January 26, 2018 Page 2

December 23, 2017, Goldleaf provided notice of this incident to the recordkeepers associated with the impacted plan participants and provided a list of the individuals associated with the recordkeeper. On January 19, 2018, Goldleaf provided notice of this incident to the plan sponsors (employers) of the impacted plan participants.

While there is no evidence that the individual(s) accessed or acquired personal information from the employee's email accounts, access to the information contained therein could not be ruled out. The email account may have contained the name, date of birth, address, Social Security Number, and financial account information of the affected New Hampshire resident.

# Notice to New Hampshire Resident

On January 26, 2018, Goldleaf will begin providing written notice of this incident to all affected individuals, which includes approximately one (1) New Hampshire resident. Written notice will be provided in substantially the same form as the letter attached here as *Exhibit A*.

# Other Steps Taken and To Be Taken

Goldleaf is providing all potentially affected individuals access to one (1) free year of credit and identity monitoring services, including identity restoration services, through Kroll, and has established a dedicated hotline for potentially affected individuals to contact with questions or concerns regarding this incident. Additionally, Goldleaf is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud, including information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. Goldleaf is also providing written notice of this incident to other state regulators as necessary.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 267-930-4775.

Very truly yours,

Christopher J. Dilenno of MULLEN COUGHLIN LLC

# **EXHIBIT A**



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

<<MemberFirstName>> <<MemberMiddleName>> <<MemberLastName>> <NameSuffix> <<Address1>> <<Address2>> <<City>>, <<State>> <<ZipCode>>

#### Re: Notice of Data Breach

Dear << MemberFirstName>> << MemberLastName>>,

We are writing to inform you of a recent event that may affect the security of your personal information. Goldleaf Partners operates as a third-party administrator for your retirement plan through your plan sponsor
ClientDef1 (Plan Sponsor Name)>> As a result, Goldleaf receives information regarding you from your plan sponsor to facilitate your retirement plan. While we are unaware of any actual or attempted misuse of your personal information, out of an abundance of caution, we are providing you with information about the incident, steps we are taking in response, and steps you can take to protect against fraud should you feel it is appropriate.

**What Happened?** On or about October 31, 2017, we discovered that Goldleaf Partners ("Goldleaf") had become the target of a phishing email campaign that compromised an employee's email account credentials. We immediately took steps to secure the employee's email accounts and launched an in-depth investigation to determine whether any sensitive information was accessed or acquired.

We subsequently determined, with the help of outside computer forensic investigators, that an unknown actor had gained access to the Goldleaf employee's email account. On December 1, 2017, Goldleaf determined, after a lengthy programmatic and manual review of the contents of the email account, the types of protected information contained in the email account and to which individuals the information relates, and promptly launched a review of our files to ascertain address information for the impacted individuals.

While we currently have no evidence that anyone accessed or acquired this information, access to the information in the email account cannot be ruled out.

What Information Was Involved? While we currently have no evidence that the unauthorized individual or individuals actually accessed or acquired your information, we have confirmed that your << ClientDef2 (data elements affected)>> were accessible to the unknown actor during this event.

What We Are Doing. We take the security of information in our care very seriously. Since discovering this event, we have been working diligently with third-party forensic investigators to determine what happened and what information was accessible to the unknown actor. This has involved a time consuming, programmatic and manual data review process. We are providing notice of this event to you, and to certain regulators and consumer reporting agencies as required.

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, a Current Credit Report, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit <<IDMonitoringURL>> to activate and take advantage of your identity monitoring services.

You have until <<Date>> to activate your identity monitoring services.

Membership Number: << Member ID>>>

What You Can Do. You can enroll and receive the free identity monitoring and identity restoration services we are offering. You can also review the enclosed Privacy Safeguards Information for additional information on how to better protect against identity theft and fraud.

For More Information. We are very sorry for any inconvenience or concern this incident causes you. The security of your information is a priority to us. Should you have any questions about the content of this letter or ways you can better protect yourself from the possibility of identity theft, please call 1-???-??? between 9:00 am and 6:00 pm ET, Monday through Friday, excluding major holidays.

Sincerely,

Wendy Hyre

Chief Administrative Officer

Goldleaf Partners

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# PRIVACY SAFEGUARDS

In addition to enrolling to receive the free monitoring and restoration services we are offering to you, we encourage you to remain vigilant against incidents of identity theft and financial loss by reviewing your account statements and monitoring your credit reports for suspicious activity. Under U.S. law, everyone is entitled to one free credit report annually from each of the three major credit bureaus. To order a free credit report, visit http://www.annualcreditreport.com/ or call, toll-free, 1-877-322-8228. Individuals may also contact the three major credit bureaus directly to request a free copy of their credit report:

Equifax	Experian	TransUnion
P.O. Box 105069	P.O. Box 2002	P.O. Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19022
800-525-6285	888-397-3742	800-680-7289
www.equifax.com	www.experian.com	www.transunion.com

At no charge, you can also have these credit bureaus place a "fraud alert" on your credit file. A "fraud alert" will tell creditors to take additional steps to verify your identity prior to granting credit in your name; however, because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the credit bureaus verify your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your files. You may use the contact information listed above to contact the major credit bureaus and place a "fraud alert" on your credit report.

You can also place a "security freeze" on your credit file that prohibits a credit bureau from releasing any information from your credit report without your written authorization but may delay, interfere with, or prevent the timely approval of any requests for new credit. If you have been a victim of identity theft, and provide the credit bureau with a valid police report, the credit bureau cannot charge to place, lift, or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. If you incur a cost to place a security freeze, please let us know. You must contact each of the credit bureaus separately to place a security freeze on your credit file:

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Equifax Security Freeze	Experian Security Freeze	TransUnion	
P.O. Box 105788	P.O. Box 9554	PO Box 2000	
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19022-2000	
1-800-685-1111	1-888-397-3742	1-888-909-8872	
(NY residents please call	www.experian.com/freeze/center.html	www.transunion.com/	
securityfreeze			

1-800-349-9960)

www.freeze.equifax.com

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue, NW, Washington, DC 20580; www.ftc.gov/idtheft; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. For Maryland residents, the Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and www.oag.state.md.us. For North Carolina residents, the Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at www.ncdoj.gov. For Rhode Island residents, the Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at www.riag.ri.gov. A total of #### IRhode Island residents may be impacted by this incident.

Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC. This notice was not delayed as the result of a law enforcement investigation.



#### TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services<sup>1</sup> from Kroll:

## Triple Bureau Credit Monitoring and Single Bureau Credit Report

Your current credit report is available for you to review. You will also receive alerts when there are changes to your credit data at any of the three national credit bureaus—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

#### **Web Watcher**

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

#### **Public Persona**

Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you'll receive an alert.

#### **Quick Cash Scan**

Quick Cash Scan monitors short-term and cash-advance loan sources. You'll receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.

## \$1 Million Identity Fraud Loss Reimbursement

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

#### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

# **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

<sup>1</sup> Kroll's activation website is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.
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