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STATE OF NH
DEPT OF JUSTICE
2016 APR 29 AM 11:53

JAMES E. PRENDERGAST
DIRECT DIAL: 215.977.4058
JIM.PRENDERGAST@LEWISBRISBOIS.COM

April 25, 2016

CONFIDENTIAL COMMUNICATION

Via First Class U.S. MAIL

Attorney General Joseph Foster
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Mr. Foster:

We represent The Home for Little Wanderers ("HLW"), 10 Guest Street, Brighton, Massachusetts 02135, and are writing to notify you of a data event that may have compromised the security of personal information of 2 New Hampshire residents. By providing notice of this incident to you, HLW does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Background

On April 11, 2016, HLW discovered that its company was targeted in an email spoofing attack. Through this attack, a request was made for 2015 IRS Tax Form W-2 information. A report with some information, including names, addresses, Social Security numbers, and compensation information, was emailed before it was discovered that the request was made from a fraudulent account by an individual purporting to be HLW's CEO. The potential release of information occurred on Monday, April 11, and HLW immediately took steps to limit further access to the information. The incident was not the result of an unauthorized intrusion into HLW's computer networks.

Notice to New Hampshire Residents

HLW determined that personally identifiable information relating to 2 New Hampshire residents was involved in this incident. HLW provided written notice of this incident to these impacted New Hampshire residents beginning on or about April 25, 2016, in substantially the same form as the letter attached hereto as ***Exhibit A***. Additionally, HLW has provided voluntary preliminary notice to all affected individuals for whom they had proper email addresses on April 11, 2016. A copy of this preliminary notification is attached hereto as ***Exhibit B***.

Other Steps Taken and To Be Taken

HLW is providing potentially impacted individuals access to 2 free years of credit monitoring through Experian. Additionally, HLW is providing potentially impacted individuals with helpful information on how to protect against identity theft and fraud, including how to place a fraud alert and security freeze on one's credit file, the contact information for the national consumer reporting agencies, 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 Internal Revenue Service, Federal Trade Commission, state attorney general, and law enforcement to report attempted or actual identity theft and fraud. HLW is also providing written notice of this incident to other state regulators as necessary.

Contact Information

Should you have any questions regarding this notification of other aspects of this event, please contact us at 215-977-4058.

Very truly yours,

James E. Prendergast of
LEWIS BRISBOIS BISGAARD & SMITH LLP

JEP:lm
Enclosures

Exhibit A

The Home for Little Wanderers
Strong families. Strong life.
10 Guest Street
Brighton, MA 02135

April 25, 2016

##B8807-L02-0123456 0001 00000001 **********9-OELZZ 123
SAMPLE A SAMPLE
APT ABC
123 ANY ST
ANYTOWN, US 12345-6789

Dear Sample A Sample:

The Home for Little Wanderers ("HLW") recently discovered an incident that may affect the security of your personal information. We are writing to provide you with information regarding the incident, steps we've taken since discovering the incident, and information on what you can do to better protect against identity theft and fraud should you feel it is appropriate to do so.

What Happened. On April 11, 2016, we discovered that our company was targeted in an email spoofing attack. Through this attack, a request was made for 2015 IRS Tax Form W-2 information. Unfortunately, a report with some information was emailed before it was discovered that the request was made from a fraudulent account by an individual purporting to be me. The potential release of information occurred on Monday, April 11th, and we immediately took steps to limit further access to the information. The incident was not the result of an unauthorized intrusion into our computer networks.

What Information Was Involved. While our investigation is ongoing, we have confirmed that a report which included your name, Social Security number, and 2015 compensation data was emailed to an unknown individual. We have confirmed your banking information was not included in this incident.

What We Are Doing. The privacy and security of your information is a priority to us. We are providing notice of this incident to potentially impacted individuals. We are also providing you with information on how to better protect against identity theft and fraud and complimentary access to two free years of credit monitoring and restoration services with Experian's® ProtectMyID® Elite product. The enclosed Privacy Safeguards Information contains information on protecting against identity theft and fraud and instructions on how to enroll and receive the complimentary credit monitoring and restoration services.

0123456

What You Can Do. While our investigation is ongoing, we felt it was important to notify you about this incident, and what we are doing to investigate and respond, as quickly as possible. We encourage you to file your tax return as soon as possible if you have not already done so, and provide you with the information below that you can use to better protect against identity theft and fraud.

(OVER PLEASE)

The IRS encourages you to file IRS Form 14039 with your 2015 tax return. You can contact the IRS at http://www.irs.gov/Individuals/Identity-Protection for helpful information and guidance on steps you can take to prevent a fraudulent tax return from being filed in your name and what to do if you become the victim of such fraud. You can also visit https://www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft for more information. We encourage you to enroll in and receive the complimentary membership to the credit monitoring and restoration services we are offering to you. We also encourage you to take the steps described in the enclosed Notice of Privacy Safeguards on how to protect yourself against identity theft and fraud.

For More Information. We recognize that you may have questions that are not answered in this letter. If you have questions regarding the incident, your affected information, and steps you may take to protect yourself against identity theft and fraud please contact Heidi Ferreira, Vice President of Risk Management, Evaluation, and Outcomes at 617-585-7541.

This notice has not been delayed as a result of a law enforcement investigation. We sincerely regret any inconvenience or concern this incident may cause you and will continue to take appropriate actions to protect the privacy of your information.

Sincerely,

Joan Wallace-Benjamin

Joan Wallace-Benjamin, Ph.D.
President & Chief Executive Officer
The Home for Little Wanderers

PRIVACY SAFEGUARDS INFORMATION

To help protect your identity, we are offering **complimentary** access to a two year membership of Experian's® ProtectMyID® Elite product. 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 ProtectMyID Now in Three Easy Steps

1. ENSURE **That You Enroll By: July 31, 2016** (Your code will not work after this date.)
2. Visit the **ProtectMyID Web Site to enroll: www.protectmyid.com/enroll**
3. PROVIDE **Your Activation Code: ABCDEFGHI**

If you have questions or need an alternative to enrolling online, please call 877-441-6943 and provide engagement #: **PC100970.**

Additional details regarding your two year ProtectMyID Membership:

A credit card is not required for enrollment.

Once your ProtectMyID membership is activated, you will receive the following features:

- **Free copy of your Experian credit report**
- **Surveillance Alerts for:**
  - **Daily 3 Bureau Credit Monitoring:** Alerts of key changes & suspicious activity found on your Experian, Equifax®, and TransUnion® credit reports.
  - **Internet Scan:** Alerts if your personal information is located on sites where compromised data is found, traded or sold.
  - **Change of Address:** Alerts of any changes in your mailing address.
- **Identity Theft Resolution & ProtectMyID ExtendCARE:** Toll-free access to US-based customer care and a dedicated Identity Theft Resolution agent who will walk you through the process of fraud resolution from start to finish for seamless service. They will investigate each incident; help with contacting credit grantors to dispute charges and close accounts including credit, debit and medical insurance cards; assist with freezing credit files; contact government agencies.
  - It is recognized that identity theft can happen months and even years after a data breach. To offer added protection, you will receive ExtendCARE™, which provides you with the same high-level of Fraud Resolution support even after your ProtectMyID membership has expired.
- **$1 Million Identity Theft Insurance[1]:** Immediately covers certain costs including, lost wages, private investigator fees, and unauthorized electronic fund transfers.
- **Lost Wallet Protection:** If you misplace or have your wallet stolen, an agent will help you cancel your credit, debit, and medical insurance cards.

Once your enrollment in ProtectMyID is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID, 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 877-441-6943.

0123456

We encourage you to remain vigilant for incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports and explanation of benefits forms for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

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[1] Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

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At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax
P.O. Box 105069
Atlanta, GA 30348
800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
800-680-7289
www.transunion.com

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services.

If you have been a victim of identity theft, and you provide the credit bureau with a valid police report, it cannot charge you 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. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place the freeze on all of your credit files.

To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
(NY residents please call 1-800-349-9960)
www.equifax.com/help/credit-freeze/en_cp

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion Fraud Victim Assistance
P.O. Box 2000
Chester, PA 19022
Fraud Division
888-909-8872
www.transunion.com/securityfreeze

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 contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, 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. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC.

Exhibit B

From: Heidi Ferreira
Sent: Monday, April 11, 2016 6:22 PM
To: All Staff
Cc: Jonathan P. Ash
Subject: DO NOT DELETE--VERY IMPORTANT INFO ABOUT YOUR EMPLOYEE INFORMATION

Importance: High

PLEASE READ IN ITS ENTIRETY—VERY IMPORTANT INFORMATION FOR YOU

Good afternoon…Unfortunately, we learned today there was a significant incident, impacting your personal information under Massachusetts Privacy Law. A number of employees received an e-mail this morning that appeared to come from our CEO, Joan Wallace-Benjamin. The e-mail asked specific employees to send her an attachment, including W-2 information for all of our employees at The Home. An employee sent the report as requested. In the report were employees' names, addresses, wages, and social security numbers. We learned later that the e-mail went to an individual with a Gmail account who does not have authorization to access the information. In addition to this e-mail, you will receive a letter at your homes, stating the same information noted in this e-mail. We are truly sorry this incident has occurred. We have started the process under Massachusetts Privacy Law, which includes notifications to the impacted individuals. If you are an intern, you are not affected.

Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. Our attorney, Jonathan Ash, is filing a police report on behalf of The Home. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

We strongly encourage you to review your credit statements and financial accounts for unexplained activity as often as possible. **If you have not yet filed your tax returns with federal and local tax authorities, we suggest you file your tax returns immediately.**

Massachusetts law also allows consumers to place a security freeze on their credit reports. A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services.

If you have been a victim of identity theft, and you provide the credit reporting agency with a valid police report, it cannot charge you to place, lift, or remove a security freeze. In all other cases, a credit reporting agency may charge you up to $5.00 each to place, temporarily lift, or permanently remove a security freeze.

To place a security freeze on your credit report, you must send a written request to each of the three major consumer reporting agencies: Equifax (www.equifax.com); Experian (www.experian.com); and TransUnion (www.transunion.com) by regular certified or overnight mail at the addresses below:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA. 30348

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013

Trans Union Security Freeze
Fraud Victim Assistance Department
P.O. Box 6790
Fullerton, CA 92834

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

1. Your full name (including your middle initial as well as Jr., Sr., II, III, etc);
2. Social security number;
3. Date of birth;
4. If you moved in the past (5) years, provide the addresses where you lived over the prior five years;
5. Proof of current address such as 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 you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft;
8. If you are not a victim of identity theft, include payment by check, money order, or credit card (Visa, MasterCard, American Express, or Discover only). Do not send cash through the mail.

The Home for Little Wanderers will provide identity theft protection if we determine you are impacted by this incident. We will have more information on these services and how to enroll in them in a separate correspondence.

The credit reporting agencies have three (3) business days after receiving your request to place a security freeze on your credit report. The credit bureaus must send written confirmation to you within five (5) 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 a security freeze in order to allow a specific entity or individual access to your credit report, you must call or send a written request to the credit reporting agencies by mail and include proper identification) 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 identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have (3) business days after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

To remove a security freeze, you must send a written request to each of the three credit bureaus by mail and include proper identification (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 three (3) business days after receiving your request to remove the security freeze.

If you have any further questions, please do not hesitate to contact me. Again, we apologize for this unfortunate circumstance.

Sincerely,

Heidi Ferreira, J.D.
Vice President of Risk Management, Evaluation, and Outcomes
The Home for Little Wanderers
10 Guest Street
Brighton , Ma. 02135
617-585-7541 (office)
617-267-8142 (fax)
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