
From: Pulcinella, Dionne <Dionne.Pulcinella@peoples.com>
Sent: Friday, November 26, 2021 2:19 AM
To: DOJ: Consumer Protection Bureau <DOJ-CPB@doj.nh.gov>
Subject: Report of a Breach of Security Involving Computerized Data

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Attention: The State of New Hampshire, Office of the Attorney General John Formelia

Pursuant to New Hampshire Revised Statutes § 359-C:20 (2020), I am writing on behalf of LEAF Commercial Capital, a subsidiary People's United Bank ("People's United") to notify you of a breach of security impacting two New Hampshire residents.

On October 22, 2021, a LEAF employee responded to a phishing email which provided the threat actor with access to the employee's email account for approximately one day, originating from an IP address in the U.S. Since the login appeared normal and included a successful multi-factor authentication (MFA) challenge, it did not trigger any alerts. On October 23, 2021, People's United Bank's Information Security ("People's Info Sec.") observed a successful connection to the same mailbox from Zambia (Africa) which triggered an alert to investigate the activity. Within an hour after this alert, People's Info Sec. investigated and contacted LEAF IT to take action on the account to contain the issue. The account was disabled approximately 2 hours later by LEAF and there has been no activity since.

Upon learning of the compromise, LEAF took measures to block access by changing the password and disabling the compromised ID. Efforts were made to review any actions taken under the compromised ID to determine if any unauthorized activities or access may have occurred. LEAF took steps to remind employees not to provide a MFA code when not expecting it through an all employee communication. The employee involved in the incident was assigned mandatory phishing supplemental training. Additional changes were made to strengthen the MFA security tool to restrict use to methods more difficult to socially engineer. Authentication mechanisms tied to external email access were reviewed and additional restrictions have been put into place to limit the ability to authenticate externally without MFA or from an untrusted source. All employees receive security training on phishing and other risks annually.

The employee's inbox contained information mostly related to corporations, however there were some individuals' Social Security Numbers. The impacted New Hampshire residents have been

notified of the incident and have been provided with information about how to enroll in myTrueIdentity identity theft protection along with a prepaid code which can be redeemed for two years of credit monitoring.

There is no law enforcement investigation underway or planned and therefore the customer notification has not been delayed. Should you have any questions or require additional information, please do not hesitate to contact me by email or phone.

Attached please find a redacted copy of the notification that was sent to the New Hampshire residents along with the mailing label for each.

Sincerely,
Dionne Pulcinella

Dionne T. Pulcinella, CIPP/US
FVP, Senior Compliance Officer, Privacy, Deposits & Payments
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November 23, 2021



Dear [REDACTED],

I am writing to notify you of an isolated incident in which your personal information may have been potentially disclosed to an unauthorized individual. During an internal investigation, we learned that a document containing your Social Security Number was among other information potentially accessed by an unauthorized individual on or around October 23, 2021. As soon as we became aware of the incident that day, we disabled the unauthorized individual's access and began an extensive investigation.

Protecting the security of personal information is a top priority. While there is no indication that the unauthorized individual accessed your information, we are providing this notification and have arranged for myTrueIdentity through TransUnion as a precaution to help you protect your identity at no cost to you. Information on how to enroll in this program and activation codes have been included below.

Your business is important to us and we regret that this incident occurred. Please be assured that LEAF will continue to work to ensure that all appropriate measures, including employee training and controls are in place to protect personal information to ensure that an incident of this nature will not happen in the future.

If you have any further questions regarding this incident, you can call me at 267-402-5337.

Sincerely,

A handwritten signature in black ink that reads "Michael P. McKie".

Michael McKie
SVP, IT Program Management LEAF
Commercial Capital One Commerce
Square 2005 Market Street, 14th Fl.
Philadelphia, PA 19103
T: 267-402-5337



WHAT WE ARE DOING

Complimentary Credit Monitoring Service

You are a valued customer, and we apologize for this error. While we have no evidence or belief that your information has been, or will be used for fraudulent purposes, and while we believe there is a low likelihood of fraud related to this incident, as a safeguard, we have arranged for you to enroll, at no cost to you, in an online three-bureau credit monitoring service (myTrueIdentity) for two years provided by TransUnion, one of the three nationwide credit reporting companies.

To enroll in this service, go to the myTrueIdentity website at www.mytrueidentity.com and in the space referenced as "Enter Activation Code", enter the following 12-letter Activation Code [REDACTED] and follow the three steps to receive your credit monitoring service online within minutes.

If you do not have access to the Internet and wish to enroll in a similar offline, paper based, credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at 1-855-288-5422. When prompted, enter the following 6-digit telephone pass code **697611** and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and **December 31, 2022**. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion, or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

Once you are enrolled, you will be able to obtain two years of unlimited access to your TransUnion credit report and credit score. The daily three-bureau credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, Experian, and Equifax, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The service also includes access to an identity restoration program that provides assistance in the event your identity is compromised to help you restore your identity and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

WHAT YOU CAN DO

Fraud Alert Information

Whether or not you enroll in credit monitoring, we recommend that you consider placing a "Fraud Alert" on your credit file. Fraud Alert messages notify potential credit grantors to verify your identification before extending credit in your name in case someone is using your information without your consent. A Fraud Alert can make it more difficult for someone to get credit in your name; however, please be aware that it also may delay your ability to obtain credit. Call only one of the following three nationwide credit reporting companies to place your Fraud Alert: TransUnion, Equifax, or Experian. As soon as the credit reporting company confirms your Fraud Alert, they will also forward your alert



request to the other two nationwide credit reporting companies so you do not need to contact each of them separately. The contact information for the three nationwide credit reporting companies is:

Equifax
PO Box 740256 Atlanta,
GA 30374
www.alerts.equifax.com
1-800-525-6285

TransUnion
PO Box 2000
Chester, PA 19016
www.transunion.com/fraud
1-800-680-7289

Experian
PO Box 9554
Allen, TX 75013
www.experian.com/fraud
1-888-397-3742

Free Credit Report Information

Under federal law, you are also entitled to one free credit report once every 12 months from each of the above three major nationwide credit reporting companies. Call 1-877-322-8228 or make a request online at www.annualcreditreport.com. Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Victim information sometimes is held for use or shared among a group of thieves at different times. Checking your credit reports periodically can help you spot problems and address them quickly. If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your Attorney General state or contact your local law enforcement agency and file a police report. Get a copy of the report; many creditors want the information it contains to absolve you of the fraudulent debts. You also should file a complaint with the Federal Trade Commission (FTC) at www.identitytheft.gov or at 1-877-ID-THEFT (1-877-438-4338). Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcers for their investigations. Also visit the FTC's website at www.ftc.gov/idtheft to review their free identity theft resources such as their comprehensive step-by-step guide "Identity Theft-A Recovery Plan".

Security Freeze Information

You can request a "Security Freeze" on your credit file by sending a request in writing, by mail, to each of the three nationwide credit reporting companies. When a Security Freeze is added to your credit report, all third parties, such as credit lenders or other companies, whose use is not exempt under law will not be able to access your credit report without your consent. The Security Freeze may delay, interfere with or prohibit the timely approval of any subsequent request or application you make that involves access to your credit report. This may include, but is not limited to, new loans, credit, mortgages, insurance, rental housing, employment, investments, licenses, cellular phone service, utility service, digital signature service, Internet credit card transactions and extension of credit at point of sale. Placing, temporarily lifting, or removing a Security Freeze with each of the nationwide consumer reporting companies is free, although placing a credit lock may have monthly fees. To place a Security Freeze on your credit files at all three nationwide credit reporting companies, write to the addresses below and include the following information:

Equifax Security Freeze
PO Box 105788

TransUnion Security Freeze
PO Box 2000

Experian Security Freeze
PO Box 9554



Atlanta, GA 30348 www.freeze.equifax.com
1-800-685-1111

Chester, PA 19016
www.transunion.com/freeze
1-800-909-8872

Allen, TX 75013
www.experian.com/freeze
1-888-397-3742

- Your full name (first, middle, last including applicable generation, such as JR., SR., 11, III, etc.)
- Your Social Security Number
- Your date of birth (month, day and year)
- Your complete address including proof of current address, such as a current utility bill, bank or insurance statement or telephone bill
- If you have moved in the past 2 years, give your previous addresses where you have lived for the past 2 years
- A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.)

Within 5 business days of receiving your request for a security freeze, the consumer credit reporting company will provide you with a personal identification number (PIN) or password to use if you choose to remove the freeze on your consumer credit report or to authorize the release of your consumer credit report to a specific party or for a specified period of time after the freeze is in place.

Special note for minors affected by this incident:

The same services referred to above may not be available to affected minors. As an alternative, parents/legal guardians can check to see if your child may be a victim of identity theft by using TransUnion's secure online form at www.transunion.com/childidentitytheft to submit your information so TransUnion can check their database for a credit file with your child's Social Security Number. After TransUnion's search is complete, they will respond to you at the email address you provide. If they locate a file in your child's name, they will ask you for additional information in order to proceed with steps to protect your child from any impact associated with this fraudulent activity.

Special note to Massachusetts residents:

Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. Based on the nature of this incident, no police report has been filed. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

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.



*my*TrueIdentity

Step-by-Step Instructions for New Members

(www.mytrueidentity.com)





myTrueIdentity Enrollment Step-by-Step Guide

SIGN UP

Navigate to www.mytrueidentity.com and enter your 12-letter Activation Code, which was provided in your notification.

Click <<"Sign Up Now">>

The screenshot displays the myTrueIdentity website interface. At the top, the TransUnion logo is on the left, and a 'Member Login' link is on the right. A central banner reads: 'Keep your identity safe and your credit health sound. Rest easy with credit monitoring alerts and access to the resources you need to protect your information.' Below this, a tablet shows the myTrueIdentity app interface, which includes sections for 'ID Protection Alerts (5)', 'Credit Alerts (2)', 'My TransUnion Credit Score' (810), and 'My Credit Overview' (showing a balance of \$1,898, utilization of 22%, and a credit limit of \$8,213). To the right of the tablet, there is a 'Sign Up Now' button and a section titled 'myTrueIdentity Key Features:' which lists: 'Alerts informing you of changes to your credit file', 'Access to identity protection support (if you believe you've become a fraud victim)', 'Quick tips & in-depth articles on identity protection and credit health', 'TransUnion credit report and score', and 'National score comparison, score factors and score trending'. At the bottom, a footer contains the text: 'This site is hosted and operated by TransUnion Interactive, Inc., a wholly owned subsidiary of TransUnion, LLC. Copyright 2016 TransUnion Interactive. All Rights Reserved.' and links for 'FAQs', 'Terms and Conditions', and 'Privacy Policy'.



myTrueIdentity Enrollment Step-by-Step Guide

STEP 1: CREATE YOUR ACCOUNT

Create a Username, (5 or more characters, no spaces)

Create a Password, (8 or more characters, letters and numbers, no spaces)

Enter your First Name, Middle Name (if you have one), and Last Name

Choose a Secret Question;
Provide your Secret Answer

Enter your email address and phone number

Click <<"Continue to Step 2">>

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Member Login

It's your credit information. See it today for **FREE**.

Step 1 Create your account

Step 2 More about you

Step 3 Verify your identity

myTrueIdentity

All fields are required (except where noted).

Username

Password

First Name

Middle Name

Last Name

--choose a secret question--

Secret Answer

Email Address

Phone Number

TransUnion Credit Score

832

990 / A

501 / F

Score Factors

Where You Stand

37% Very Good 825

12% Good 795

18% Fair 715

Detect fraud.

Monitor your credit information. Learn how you can protect your identity and credit health.

Continue to Step 2

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myTrueIdentity Enrollment Step-by-Step Guide

STEP 2: MORE ABOUT YOU

Enter your date of birth and current mailing address

If you have not lived at your address for more than 6 months, also input your previous address

Enter the last 4 digits of your Social Security Number

Read Terms and Conditions

Click <<"I Accept & Continue to Step 3">>

The screenshot shows the TransUnion myTrueIdentity enrollment interface. At the top, the TransUnion logo and a 'Member Login' link are visible. The main heading reads 'Please tell us just a little more to complete the process.' Below this is a progress bar with three steps: 'Step 1 Create your account', 'Step 2 More about you' (which is highlighted in yellow), and 'Step 3 Verify your identity'. The form fields include: 'Date of Birth (MM/DD/YYYY)' with separate boxes for MM, DD, and YYYY; 'Address and Unit Number'; 'City'; 'State' (a dropdown menu) and 'Zip'; and a question 'Have you lived here for more than six months?' with 'Yes' (selected) and 'No' radio buttons. Below this is 'Last four digits of Social Security Number' with three input boxes (the first two contain 'XX'). A large orange button at the bottom says 'I Accept & Continue to Step 3'. To the right of the form, there is a section titled 'Almost there!' with a message about credit alerts and identity protection, and a vertical list of icons for Alerts, Support, Resources, and Score Trending. At the bottom right, there is a 'TransUnion® Secure Server' lock icon. The footer contains a small disclaimer about the site being hosted and operated by TransUnion Interactive, Inc., and links for FAQs, Terms and Conditions, and Privacy Policy.

TransUnion

Member Login

Please tell us just a little more to complete the process.

Step 1 Create your account Step 2 More about you Step 3 Verify your identity

All fields required

Date of Birth (MM/DD/YYYY)

MM DD YYYY

Address and Unit Number

City

State Zip

Have you lived here for more than six months?

Yes No

Last four digits of Social Security Number

XXX XX

You understand that by clicking on the "I Accept & Continue to Step 3" button below, you agree to TransUnion Consumer Interactive's Terms and Conditions and you are providing "written instructions" authorizing TransUnion Interactive, Inc. to obtain information from your personal credit profile from TransUnion in order to confirm your identity and display your credit data to you.

I Accept & Continue to Step 3

Almost there!
Before you can access your Credit Alerts and Identity Protection services, we need to verify your identity.

Alerts

Support

Resources

Score Trending

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FAQs Terms and Conditions Privacy Policy



myTrueIdentity Enrollment Step-by-Step Guide

STEP 3: VERIFY YOUR IDENTITY

A series of questions will be asked to ensure you are really you. Please answer the question by clicking on the appropriate circle.

Click <<"Verify My Identity">>

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For your protection, we need to make sure you are really **Kirsten**. Please verify your identity by answering a few questions only you would know.

Step 1 Create your account

Step 2 More about you

Step 3 Verify your identity

- You have one chance to answer each question correctly.
- If none of the answers look correct, select "none of the above".

- If you need to consult your records for an answer, login later to continue where you left off.
- If you have difficulty, a toll-free number will be provided.

What state was your social security number issued (this could be the state in which you were born or had your first job)?

☐ New Mexico

☐ California

☐ Louisiana

☐ North Carolina

☐ None of the above

What is the monthly payment of your most recent auto loan or lease?

☐ \$400 - \$499

☐ \$500 - \$599

☐ \$600 - \$699

☐ \$200 - \$299

☐ None of the above

What is the monthly payment on your student loan?

☐ \$300 - \$349

☐ \$400 - \$449

☐ \$200 - \$249

☐ \$350 - \$399

☐ None of the above

Verify My Identity

TransUnion® Secure Server

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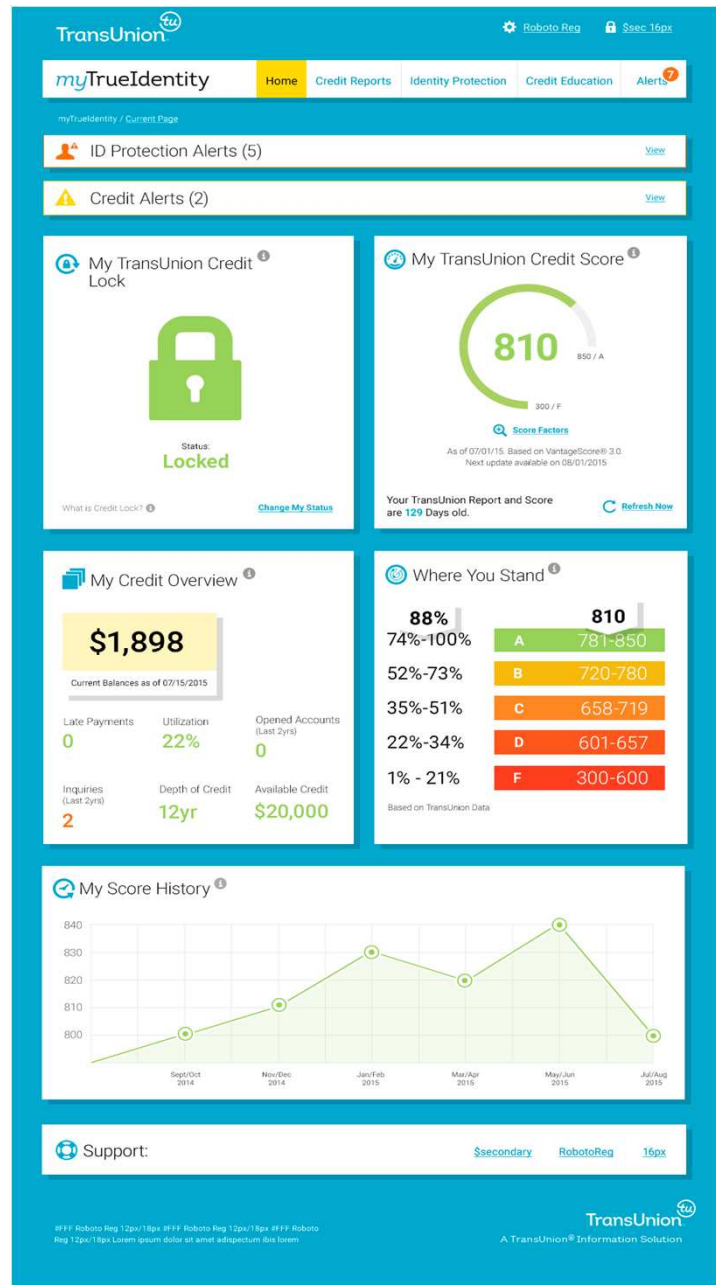
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myTrueIdentity Enrollment Step-by-Step Guide

WELCOME TO myTrueIdentity

Upon successful completion of the three steps, you will be brought to the myTrueIdentity dashboard "Home" page where you can access all of the benefits that were provided to you.



Need help? Having problems? Have a question?

If you have questions about your credit benefits, need help accessing your report or passing identity verification, please contact our Customer Service Team at 1-844-787-4607
Monday - Thursday, 8am - midnight ET and Friday - Sunday, 8am - 8pm ET.



myTrueIdentity Enrollment Step-by-Step Guide

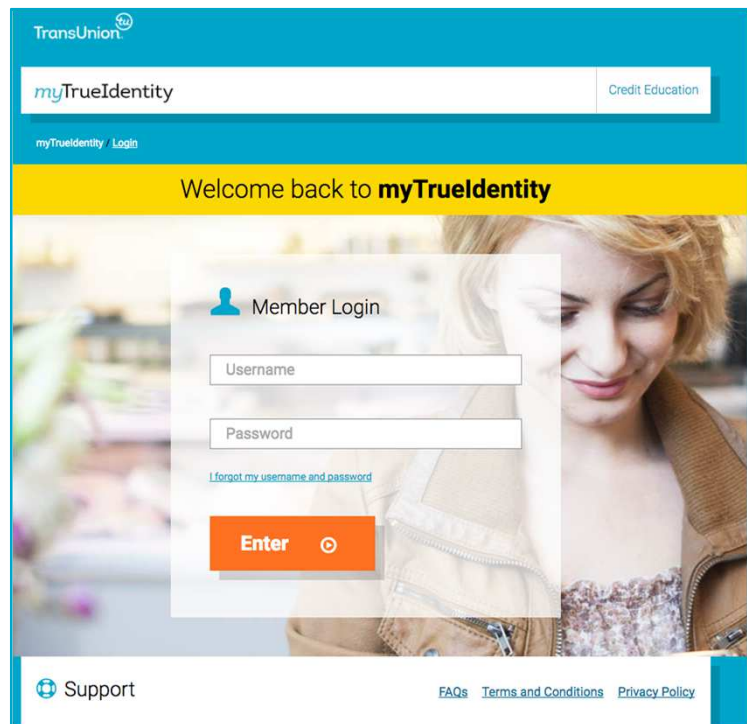
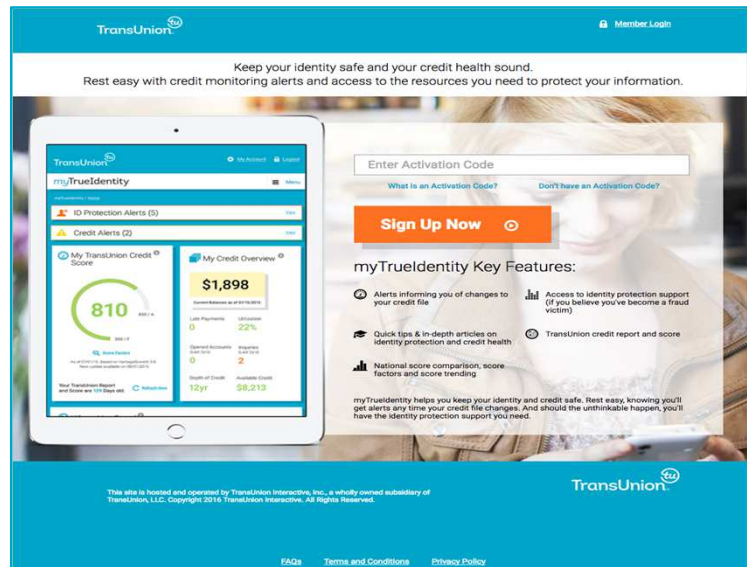
MEMBER LOGIN

When returning to mytrueidentity.com, click on the "Member Login" link located in the upper right corner.

Enter the Username and Password you created.

Click <<"Enter">>

If you have forgotten your username or password, please click on the "I forgot my username and password" link and complete the information requested. You will be asked to change your login information before accessing your account.



Need help? Having problems? Have a question?

If you have questions about your credit benefits, need help accessing your report or passing identity verification, please contact our Customer Service Team at 1-844-787-4607 Monday - Thursday, 8am - midnight ET and Friday - Sunday, 8am - 8pm ET.



Thank you.



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