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June 15, 2023

Via Email: DOJ-CPB@doj.nh.gov

Consumer Protection Bureau Office of the Attorney General 33 Capitol Street Concord, NH 03301

### **Re: Notification of a Potential Data Security Incident**

To Whom It May Concern:

We are writing to provide notice on behalf of Mondelēz Global LLC ("Mondelēz") to the Office of the Attorney General, pursuant to N.H. RSA § 359-C:20, regarding an incident involving 249 New Hampshire residents.

Mondelēz retained the legal services of the law firm Bryan Cave Leighton Paisner LLP ("Bryan Cave") to provide advice on customary legal matters of a company its size. To provide these services, Bryan Cave obtained some personal information of current and former Mondelēz employees. Bryan Cave has stated that on February 27, 2023, it detected unauthorized access to its systems, including an area it used to store certain customer files. This access occurred from February 23, 2023 until March 1, 2023. Bryan Cave initiated a robust investigation with the assistance of an outside cybersecurity forensics firm and notified law enforcement. Bryan Cave informed us of unauthorized access on March 24, 2023, while continuing to investigate the incident, and later confirmed that an unauthorized third party acquired certain data, which is still being determined. On May 22, 2023, based upon additional information received from Bryan Cave, Mondelēz determined that it finally had enough information to determine who was impacted and that affected individuals should be notified. Mondelēz proceeded to conduct a thorough review of impacted information to identify all affected current and former employees, which was just completed, and is now providing notification. Please know that this incident did not occur on or affect Mondelēz systems or networks in any way, and Bryan Cave informed us that they have taken steps to address the incident and prevent a similar occurrence in the future.

The information affected varies by individual but includes one or more of the following types of personal information:

On June 15, 2023, Mondelēz mailed notifications to the affected residents, offering a 24-month subscription for credit monitoring and identity protection through Experian. Affected residents may enroll in the services at no cost by using a promotional code and instructions provided to them in the notification letter.

A sample notification letter is enclosed.

Should you have any questions regarding this matter or if we can be of any further assistance to the New Hampshire residents affected by this incident, please contact me at

Respectfully submitted,

## **DLA Piper LLP (US)**

Andrew Serwin Partner

Enclosure: Sample Notification Letter

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June 15, 2023



Return Mail Processing PO Box 589 Claysburg, PA 16625-0589



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#### **Re: NOTICE OF DATA BREACH**

Dear Sample A. Sample:

Mondelēz Global LLC ("Mondelēz," "we," "us," "our") is writing to inform you of an incident that involved some of your personal information. While we are unaware of any attempted or actual misuse of your information, we are providing you with information about the event, our response, and steps you can take to protect your personal information. Mondelēz takes this incident and the security of your personal information very seriously, and we sincerely regret any concern or issue this incident may cause.

**WHAT HAPPENED?** Mondelēz retained the legal services of the law firm Bryan Cave Leighton Paisner LLP ("Bryan Cave") to provide advice on customary legal matters of a company its size. To provide these services, Bryan Cave obtained some personal information of current and former Mondelēz employees.

Bryan Cave has stated that on February 27, 2023, it detected unauthorized access to its systems, including an area it used to store certain customer files. This access occurred from February 23, 2023 until March 1, 2023. Bryan Cave initiated a robust investigation with the assistance of an outside cybersecurity forensics firm and notified law enforcement. Bryan Cave informed us of unauthorized access on March 24, 2023, while continuing to investigate the incident, and later confirmed that an unauthorized third party acquired certain data, which was still being determined. On May 22, 2023, based upon additional information received from Bryan Cave, Mondelēz determined that it finally had enough information to determine who was impacted and that affected individuals should be notified. Mondelēz proceeded to conduct a thorough review of impacted information to identify all affected current and former employees, which was just completed, and is now providing notification. Please know that this incident did not occur on or affect Mondelēz systems or networks in any way.

**WHAT INFORMATION WAS INVOLVED?** The investigation determined that the personal information which was included in the impacted data may include your:

. Financial information, such as account information or credit card numbers, were not involved in this incident.

WHAT WE ARE DOING. Please know that protecting your personal information is something that Mondelēz takes very seriously. Bryan Cave conducted an investigation with an outside cybersecurity forensic firm to confirm the nature and scope of the incident. Bryan Cave also notified law enforcement. Bryan Cave informed us that they have taken steps to address the incident and prevent a similar occurrence in the future. Mondelēz is providing notice and offering credit monitoring services to individuals based on the personal information that was potentially impacted.

**WHAT YOU CAN DO.** We encourage you to remain vigilant by reviewing account statements and monitoring free credit reports. You should regularly change your passwords. You may want to temporarily freeze your credit. You should be on guard for schemes where malicious actors may pretend to represent Mondelēz or reference this incident. If you have questions, please contact us at the number described below.

To help protect your identity, we are offering complimentary access to Experian IdentityWorks<sup>SM</sup> Credit Plus 1B for 24 months. This helps detect possible misuse of your personal information and provides you with identity protection support focused on immediate identification and resolution of identity theft. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

To enroll in this credit monitoring service, please contact Experian by calling the phone number listed below. If you have internet access, you may also enroll by visiting the website listed below. You will need the Activation Code provided below to complete your enrollment.

 Enrollment URL:

 Your Activation Code:

 Enrollment Deadline:

 (Please be sure to enroll by this date; your code will not work after the deadline.)

If you have questions about the product or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 833-901-4621 by September 30, 2023. Be prepared to provide engagement number for Experian.

# ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- Experian credit report at signup: See what information is associated with your credit file. Daily credit reports are available for online members only. \*
- Credit Monitoring: Actively monitors Experian file for indicators of fraud.
- Internet Surveillance: Technology searches the web, chat rooms and bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- Identity Restoration: Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- Experian IdentityWorks ExtendCARE<sup>TM</sup>: You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- \$1 Million Identity Theft Insurance\*\*: Provides coverage for certain costs and unauthorized electronic fund transfers.

\* Offline members will be eligible to call for additional reports quarterly after enrolling.

**FOR MORE INFORMATION.** We sincerely regret any inconvenience or concern caused by this incident. If you have further questions or concerns, or would like an alternative to enrolling online, please call 833-901-4621 toll-free Monday through Friday from 8 am -10 pm Central, or Saturday and Sunday from 10 am -7 pm Central (excluding major U.S. holidays). Be prepared to provide engagement number B096059.

Sincerely,

<sup>\*\*</sup> The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

#### **Information About Identity Theft Protection**

### **Monitor Your Accounts**

We recommend that you regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

Equifax®	Experian	<b>TransUnion</b> <sup>®</sup>
P.O. Box 740241	P.O. Box 9701	P.O. Box 1000
Atlanta, GA 30374-0241	Allen, TX 75013-9701	Chester, PA 19016-1000
1-800-685-1111	1-888-397-3742	1-800-888-4213
www.equifax.com	www.experian.com	www.transunion.com

When you receive your credit reports, review them carefully. Look for accounts or creditor inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number that is not accurate. If you see anything you do not understand, call the credit reporting agency at the telephone number on the report.

#### Credit Freeze

You have the right to put a security freeze, also known as a credit freeze, on your credit file, so that no new credit can be opened in your name without the use of a Personal Identification Number (PIN) that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to access your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. Should you wish to place a credit freeze, please contact all three major consumer reporting agencies listed below.

Equifax	Experian	TransUnion
P.O. Box 105788	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30348-5788	Allen, TX 75013-9554	Chester, PA 19016-2000
1-800-685-1111	1-888-397-3742	1-888-909-8872
www.equifax.com/personal/	www.experian.com/	www.transunion.com/
credit-report-services	freeze/center html	credit-freeze

You must separately place a credit freeze on your credit file at each credit reporting agency. The following information should be included when requesting a credit freeze:

- 1) Full name, with middle initial and any suffixes;
- 2) Social Security number;
- 3) Date of birth (month, day, and year);
- 4) Current address and previous addresses for the past five (5) years;
- 5) Proof of current address, such as a current utility bill or telephone bill;
- 6) Other personal information as required by the applicable credit reporting agency;

If you request a credit freeze online or by phone, then the credit reporting agencies have one (1) business day after receiving your request to place a credit freeze on your credit file report. If you request a lift of the credit freeze online or by phone, then the credit reporting agency must lift the freeze within one (1) hour. If you request a credit freeze or lift of a credit freeze by mail, then the credit agency must place or lift the credit freeze no later than three (3) business days after getting your request.

#### Fraud Alerts

You also have the right to place an initial or extended fraud alert on your file at no cost. An initial fraud alert lasts 1-year and is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting 7 years. Should you wish to place a fraud alert, please contact any one of the agencies listed below. The agency you contact will then contact the other two credit agencies.

Equifax P.O. Box 105788 Atlanta, GA 30348-5788 1-888-766-0008 www.equifax.com/personal/ credit-report-services Experian P.O. Box 9554 Allen, TX 75013-9554 1-888-397-3742 www.experian.com/ fraud/center html TransUnion P.O. Box 2000 Chester, PA 19016-2000 1-800-680-7289 www.transunion.com/fraudvictim-resource/place-fraud-alert

#### **Additional Information**

You can further educate yourself regarding identity theft and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC.

The Federal Trade Commission 600 Pennsylvania Avenue, NW Washington, DC 20580 1-877-ID-THEFT (1-877-438-4338) TTY: 1-866-653-4261 www ftc.gov/idtheft

**District of Columbia Residents:** You may obtain information about preventing and avoiding identity theft from the Office of the Attorney General for the District of Columbia at:

Office of the Attorney General for the District of Columbia 400 6<sup>th</sup> Street, NW Washington, D.C. 20001 (202) 727-3400 Email: oag@dc.gov https://oag.dc.gov/Consumer

**Maryland Residents:** You may obtain information about preventing and avoiding identity theft from the Maryland Attorney General's Office at:

Attorney General of Maryland 200 St. Paul Place Baltimore, MD 21202 Telephone: 1-888-743-0023 www.oag.state md.us

**New Mexico Residents:** You have rights under the federal Fair Credit Reporting Act ("FCRA"). These include: the right to access information in your consumer file at a consumer reporting agency; to dispute incomplete or inaccurate information in your consumer file at a consumer reporting agency; to have consumer reporting agencies correct or delete inaccurate information in your consumer file; the right to block information in your consumer file that is the result of identity theft; and the right to have a fraud alert placed on your consumer file (as described above). For more information, please visit <u>www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf</u>.

**New York Residents:** You may obtain information about security breach response and identity theft prevention and protection from the following New York state agencies:

New York Attorney General	New York Department of State
Consumer Frauds & Protection Bureau	Division of Consumer Protection
The Capitol	99 Washington Avenue, Suite 650
Albany, NY 12224-0341	Albany, NY 12231
(800) 771-7755	(800) 697-1220
https://ag ny.gov/consumer-frauds-bureau	<u>www.dos ny.gov</u>

North Carolina Residents: You may obtain information about preventing identity theft from the North Carolina Attorney General's Office at:

Office of the Attorney General of North Carolina 114 West Edenton Street Raleigh, NC 27699-9001 Telephone: 1-919-716-6400 www.ncdoj.gov

**Oregon Residents:** You may obtain information about reporting suspected identity theft from the following Oregon agencies:

Office of the Attorney General Oregon Department of Justice 1162 Court St. NE Salem, OR 97301-4096 Email: AttorneyGeneral@doj.state.or.us Office of Attorney General Consumer Protection Toll-Free: 1-877-877-9392 https://justice.oregon.gov/consumercomplaints/