



Charles E. Westerhaus
Associate
charles.westerhaus@faegredrinker.com
+1 317 569 4852 direct

RECEIVED

faegredrinker.com

OCT 10 2023

Faegre Drinker Biddle & Reath LLP
600 East 96th Street, Suite 600
Indianapolis, Indiana 46240
+1 317 569 9600 main
+1 317 569 4800 fax

October 4, 2023

VIA CERTIFIED MAIL

Attorney General John M. Formella
Office of the New Hampshire Attorney General
Attn: Data Incident Notification
33 Capitol Street
Concord, NH 03301

RE: Security Incident Notification

Dear Attorney General Formella:

I am writing to inform you about a security incident affecting **two (2)** New Hampshire residents.

Our firm represents the Off the Chain LP ("**Off the Chain**"), whose fund administrator, MG Stover, experienced a security incident. We are hereby formally notifying you of this event pursuant to RSA 359-C:20. By providing this notice, Off the Chain does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire notification security breach statute, or all/any other applicable laws (including those pertaining to personal jurisdiction).

On Wednesday, September 20, 2023, MG Stover learned that the unauthorized party had gained unauthorized access to the administrator account at Retool, which enabled the unauthorized party to gain access to all Retool managed service customers' systems. Retool demonstrated to MG Stover that they successfully contained the incident and terminated all unauthorized access. MG Stover's company network was not affected and has not been compromised. On Friday, September 22, 2023, MG Stover discovered that the attacker was able to query data from the customer systems connected to Retool, which contained sensitive data.

Potentially exposed records included the

To date, we have not received any reports of actual or attempted misuse of this information.

Upon being notified of the breach, MG Stover immediately began an internal investigation and took actions to 1) review all Retool user accounts and 2) assess the impact of the event. Retool

October 4, 2023

demonstrated to MG Stover that they had successfully contained the incident and terminated all unauthorized access.

Retool took action to terminate the relationship with the third-party contractor for whom the breached individual support person worked. In addition, they changed the process of adding devices to the VPN to require a human-in-the-loop manual review with administrator approval and synchronous verification of the employee's government ID. Further, Retool disabled user-level updates that enable support flow and implemented database-level constraints for updating critical user-level properties, restricting even the support team from performing these actions. Retool has also added a requirement for hardware keys in order to access any admin-level tooling, regardless of location. Vendors must meet this requirement.

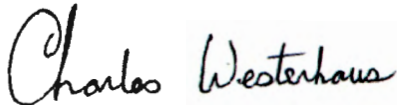
MG Stover has rotated the credentials of the breached user, enabled MFA for all users, reviewed all user activity logs within Retool, reviewed other managed services with sensitive data access, and initiated a review of data access to ensure minimal sensitive data exposure to Retool. Finally, MG Stover has initiated an evaluation of alternative service providers to Retool.

MG Stover ensured that its company network and other third-party applications were not affected and had not been compromised.

As noted above, this breach impacts two New Hampshire residents. Notices to the two individuals were sent on October 2, 2023. The notification letter includes an offer of free credit monitoring for one year.

If you have any questions or concerns, please do not hesitate to contact me at

Very Respectfully,

A handwritten signature in black ink that reads "Charles Westerhaus". The signature is written in a cursive, flowing style.

Charles E. Westerhaus

CEW/

Attachment, Breach Notification Letter