

HOEFLE, PHOENIX, GORMLEY & ROBERTS, PLLC

ATTORNEYS AT LAW

127 Parrott Avenue | Portsmouth, NH, 03801
Telephone: 603.436.0666 | Facsimile: 603.431.0879 | www.hpgrlaw.com

March 1, 2024

VIA EMAIL (DOJ-CPB@doj.nh.gov) AND FIRST-CLASS U.S. MAIL

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

RE: Notice of Security Incident

Dear Attorney General Formella:

This office represents Port City Air, Inc. ("PCA"), a fixed-base operator located in Portsmouth, New Hampshire. I write concerning a recent data security incident that may have affected personal information belonging to 109 New Hampshire residents.

1. Description of incident.

On February 14, 2024, PCA's payroll office attempted to transmit information to PCA's Payroll Accountant, to upload into the company's 401(k) plan administrator's system. The attempted transmission was made using PCA's payroll software produced by UKG. By accident, the software unintentionally transmitted that data via e-mail to some current and former PCA personnel and one employee at UKG. The email included an attachment, generated for PCA's payroll purposes, containing a list of each employee's

The e-mail was sent to the e-mail addresses that employees had entered into PCA's payroll software to receive their individual payroll information. Some employees register personal e-mail addresses for payroll purposes, which means that some employees received the errant transmission at their personal e-mail address.

PCA discovered this accident the same day, almost immediately after the e-mails were sent. PCA's information technology personnel immediately became involved to understand and address the issue.

DANIEL C. HOEFLE	R. PETER TAYLOR	GREGORY D. ROBBINS	OF COUNSEL:
R. TIMOTHY PHOENIX	ALEC L. MCEACHERN	PETER V. DOYLE	SAMUEL R. REID
LAWRENCE B. GORMLEY	KEVIN M. BAUM	MONICA F. KIESER	JOHN AHLGREN
STEPHEN H. ROBERTS	JACOB J.B. MARVELLEY	STEPHANIE J. JOHNSON	

2. Number of New Hampshire residents affected and notice provided.

PCA has determined that 109 New Hampshire residents may have been affected.

On February 14, 2024, the same day as the incident, PCA notified all current employees by a combination of e-mail and manager outreach and gave instructions to permanently delete the e-mail from all accounts and devices. PCA also contacted UKG to give the same instruction for UKG's employee who received the information.

On February 22, 2024, PCA notified all affected persons by First Class United States Mail. PCA sent two letters: one to current and former employees whose information was included in the disclosure, and a separate letter to recipients of the information whose information was not disclosed (all current or former employees). Enclosed, please find an example of each type of letter.

3. PCA's response to the incident.

On February 14, 2024, the date of the incident, PCA began an investigation to understand how the incident occurred, and to ensure it will not happen again. PCA is in direct contact with its payroll software vendor, UKG, to evaluate and implement security measures so that, in the future, the software will prohibit inadvertent disclosures of personal information.

PCA gave notice to its employees, including those affected by this incident, as described above. While no passwords were disclosed in the incident, PCA has recommended to all affected persons that they change their personal e-mail passwords and enable two-factor authentication. PCA is also providing everyone affected, plus unaffected current employees, with a three-year complimentary subscription to Norton LifeLock, as further described in the enclosed sample letters.

Please contact me with any questions or if you should require further information.

Sincerely,

Jacob Marvelley

Enclosure

Enclosure 1
Notice to Affected Persons



Great Circle Catering • Seacoast Aviation • Air New England

February 22, 2024

Dear [REDACTED],

On February 14, 2024, Port City Air Inc. ("PCA") gave employees notice about a security breach of its payroll information. That day, by e-mail to PCA's "All Employees" distribution group, PCA explained the issue and outlined immediate steps you should take to help protect you and your fellow employees' data. This notice provides further information about the breach, steps we are taking, and steps we recommend that you take.

Our initial investigation indicates that your information was included in this accidental security breach.

On February 14, 2024, PCA's payroll office was attempting to transmit information to PCA's 401(k) plan administrator. The transmission was made using PCA's payroll software produced by UKG. By accident, the software unintentionally transmitted that data via e-mail to some current and former PCA personnel and one employee at UKG. The email included an attachment, generated for PCA's payroll purposes, that contains a list of each employee's name, Social Security Number, date of hire, gross pay, hours worked, and 401(k) contribution amount. The e-mail was sent to the e-mail addresses entered into PCA's payroll software. Some employees register personal e-mail addresses for payroll purposes, which means that some employees received the errant e-mail at their personal e-mail address.

PCA discovered this accident almost immediately after the e-mails were sent. Our IT department immediately became involved to understand and address the issue. We notified all employees by a combination of e-mail and manager outreach and gave instructions to permanently delete the e-mail from all accounts and devices. We are in contact with UKG regarding this issue.

The same day, PCA gave follow-up advice that employees should, again, delete the e-mail, change their e-mail password, and set up multi-factor authentication for their work and personal e-mail accounts. While no passwords were disclosed in the security breach, changing your e-mail password and setting up multi-factor authentication is still an important safety tool to guard against theft.

PCA is investigating the matter and determining appropriate steps to avoid a repeat of this incident. We are also reviewing our policies and procedures on how to store and transmit sensitive information. PCA is in contact with UKG, to find a software-based solution to prevent this type of disclosure. PCA is also removing any personal e-mail addresses from the payroll systems: any current employee who does not currently have a PCA-issued e-mail account will soon be assigned one. That way, should there be an inadvertent disclosure in the future, the data should not leave PCA's IT environment.



104 Grafton Drive
Portsmouth, NH 03801



tel: 603.430.1111
fax: 603.766.0266



info@portcityair.com
www.portcityair.com

We reiterate that employees should take protective steps, as outlined in PCA's prior communications, to change your e-mail passwords and set up multi-factor authentication for your e-mail and other personal accounts.

We are also providing you with a three-year subscription to Norton LifeLock at no cost to you. The enclosed handout explains the benefits that Norton LifeLock provides. In the coming days, you will receive an e-mail from Norton LifeLock, which will provide the necessary information to register for that service. Norton will send that e-mail to the e-mail address you had on file with PCA's payroll software as of February 14, 2024. **Please note that you must register for LifeLock, otherwise you will not receive its protections.**

If you would like to learn more about how to enroll in LifeLock, and see a product demonstration, please follow these QR codes:

We regret this accident and are committed to helping PCA employees take protective measures. If you have any questions, please contact Kathy Temple at

Sincerely,

Port City Air, Inc.



104 Grafton Drive
Portsmouth, NH 03801



tel: 603.430.1111
fax: 603.766.0266

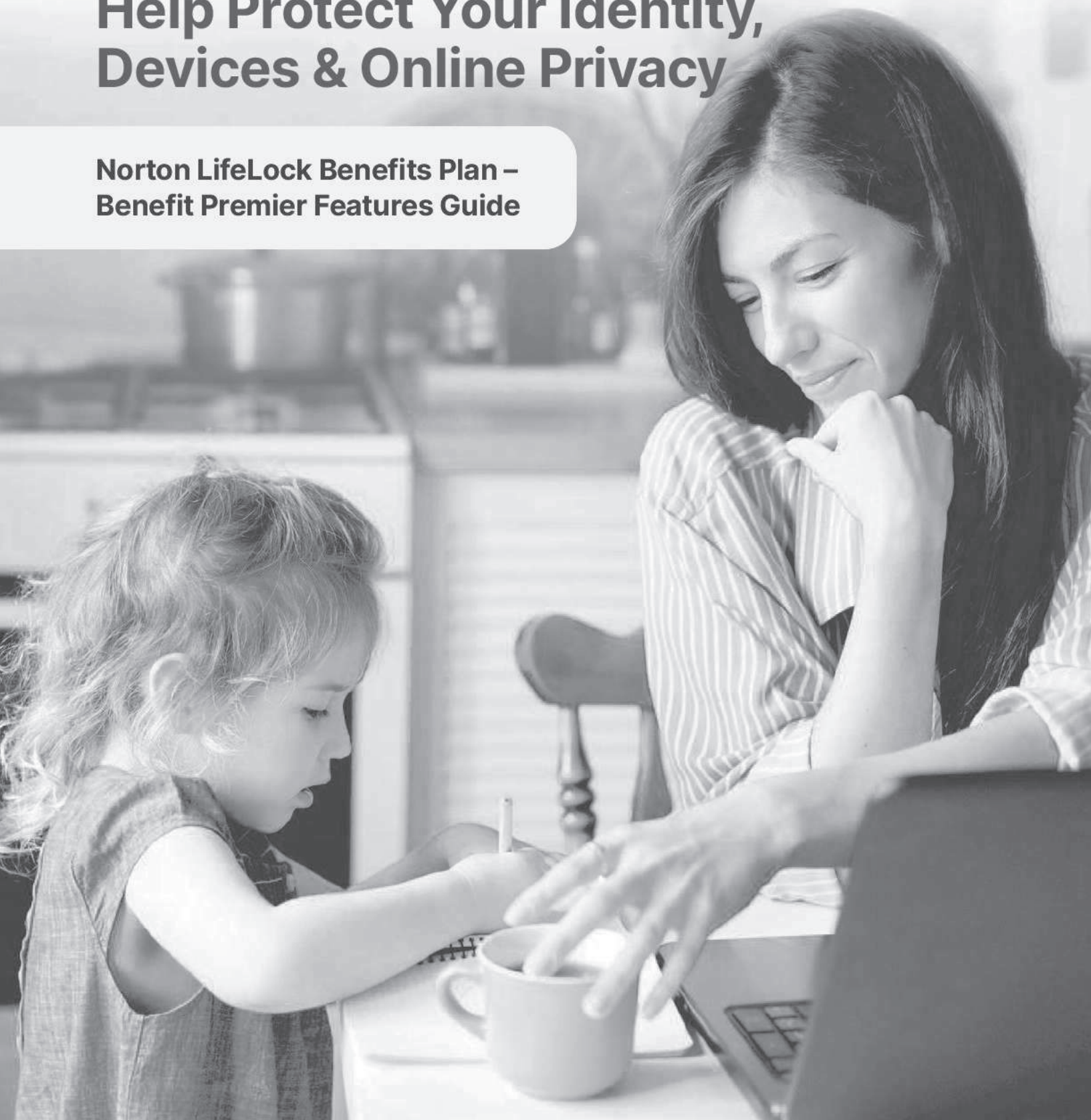


info@portcityair.com
www.portcityair.com



Your Employee Benefit Can Help Protect Your Identity, Devices & Online Privacy

**Norton LifeLock Benefits Plan –
Benefit Premier Features Guide**



Norton LifeLock Benefit Plans

NORTON WITH LIFELock
**BENEFIT
PREMIER**

LIFELock IDENTITY THEFT PROTECTION



Identity Lock^{1§}

Criminals can steal your identity to open credit cards, bank and utility accounts or even take out a loan in your name. With a single click, Identity Lock lets you lock your TransUnion credit¹ file to help protect against identity thieves from opening accounts or taking out loans in your name. And you can unlock it whenever you need to open a new credit account.

Locking or unlocking your credit file does not affect your credit score and does not stop all companies and agencies from pulling your credit file. The credit lock on your TransUnion file will be unlocked if your subscription is downgraded or canceled.



Social Media Monitoring*

Our Social Media Monitoring feature helps you keep your social media accounts safer. We monitor your linked accounts on the most popular social media sites and notify you if we think your account may be compromised or if we detect risky links.



Home Title Monitoring

Your home is likely your biggest asset, but how often do you monitor the title to your home? Someone could take out a loan and lien against your home[§] without your knowledge. We will monitor and notify you if we detect changes made at the county recorder's office** related to your home's title so you can take necessary action to protect your home.



Credit, Bank & Utility Account Freezes

Criminals can steal your identity to open credit cards, bank accounts or utilities in your name. We provide easy instructions and quick access so you can freeze credit, bank and utility files with each consumer reporting company to help protect against criminals using your information to open new accounts or take out loans in your name.



Mobile App (Android™ & iOS)§

Downloading the app does not provide protection.

With the mobile app, you will be able to receive alerts† via push notification and respond to them right away. If you tell us any activity looks suspicious, our LifeLock Identity Protection Agents will be able to help you.

No one can prevent all identity theft or all cybercrime.

[†] The LifeLock alert network includes a variety of product features and data sources. Although its very extensive, our network does not cover all transactions at all businesses, so you might not receive a LifeLock alert in every single case.

* Does not include monitoring of chats or direct messages.

• Home Title Monitoring feature includes your home, second home, rental home, or other properties where you have an ownership interest.

** In your state, the office that maintains real estate records could be known as a county recorder, registrar of deeds, clerk of the court, or some other government agency.

§ These features are not enabled upon enrollment. Member must take action to get their protection. Does not include monitoring of chats or direct messages.

¹ If your plan includes credit reports, scores, and/or credit monitoring features ("Credit Features"), two requirements must be met to receive said features: (i) your identity must be successfully verified with Equifax; and (ii) Equifax must be able to locate your credit file and it must contain sufficient credit history information. IF EITHER OF THE FOREGOING REQUIREMENTS ARE NOT MET YOU WILL NOT RECEIVE CREDIT FEATURES FROM ANY BUREAU. If your plan also includes Credit Features from Experian and/or TransUnion, the above verification process must also be successfully completed with Experian and/or TransUnion, as applicable. If verification is successfully completed with Equifax, but not with Experian and/or TransUnion, as applicable, you will not receive Credit Features from such bureau(s) until the verification process is successfully completed and until then you will only receive Credit Features from Equifax. Any credit monitoring from Experian and TransUnion will take several days to begin after your successful plan enrollment. Please note that in order to enjoy all features in your chosen plan, such as bank account alerts, credit monitoring, and credit reports, it may require additional action from you and may not be available until completion.



USPS Address Change Verification

Identity thieves try to divert mail to get important financial information. LifeLock lets you know of address change requests at the U.S. Postal Service linked to your identity.



LifeLock Identity Alert™ System†

It's the foundation for all LifeLock services. We monitor for fraudulent use of your Social Security number, name, address, or date of birth in applications for credit and services. The patented system sends alerts by text, phone#, email, or mobile app.



- **Payday Online Lending** detects† if someone attempts to obtain an online payday loan using your identity.
- **Telecom & Cable Applications** for new service.
- **Credit Alerts/Social Security Number Alerts†** include credit card and auto loan applications.
- **Identity Verification Monitoring†** Banks and other companies may attempt to verify your identity when you open a new credit card account, get a car loan, or even when logging into your banking account online. This is done by asking you questions only you should be able to answer, like the name of your best friend or by texting you a one-time usage code. But what happens if a cybercriminal is attempting to impersonate you to open new accounts? We monitor our network and alert you if we detect a bank, utility or other company attempting to verify your identity so you can take action to help protect your identity, if this was not initiated by you.



Dark Web Monitoring§

Identity thieves can buy or sell your personal information on hard-to-find dark web sites and forums. LifeLock patrols the dark web and notifies you if we find your information.



- **Password Combo List§** Provides notifications when we find your username/email and password paired together on the dark web so you can take action to protect your information.
- **Gamer Tags§** You may add up to 10 gamer tags in your portal, and we'll notify you if any are found on the dark web.



Sex Offender Registry Reports

Receive notifications if your name and personal information appear in a sex offender registry.



No one can prevent all identity theft or all cybercrime.

† The LifeLock alert network includes a variety of product features and data sources. Although its very extensive, our network does not cover all transactions at all businesses, so you might not receive a LifeLock alert in every single case.

‡ Phone alerts made during normal local business hours.

§ These features are not enabled upon enrollment. Member must take action to get their protection. Does not include monitoring of chats or direct messages.

Norton LifeLock Benefit Plans

LIFELock IDENTITY THEFT PROTECTION



Credit Application Alerts^{2§}

We monitor your credit file at a leading credit bureau and provide alerts for any new credit applications to help detect fraud.



Credit Monitoring^{1§}

Credit Monitoring is one of the critically important dimensions to monitor to detect potential identity theft issues as changes are made to your credit file. As a LifeLock with Norton Benefit Plan member, we monitor key changes to your credit file at one or three of the leading credit bureaus, depending on your plan, and alert you to help detect fraud.



Credit Reports & Credit Scores^{1§}

Online access to your credit reports and credit scores from the primary bureaus. It's a convenient way to see details of your credit history over the past year.

The credit scores provided are VantageScore 3.0 credit scores based on data from Equifax, Experian and TransUnion respectively. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your creditworthiness

- **Credit on-demand** Get your latest credit reports and credit scores¹ when you need them. If you select LifeLock with Norton Benefit Premier, you will have the benefit of Three-Bureau Annual Credit Reports and Credit Scores¹ and you'll be notified when your annual reports and scores are available for review.



Monthly Credit Score Tracking^{1§}

This monthly one-bureau credit score tracker helps you identify important changes and see how your credit is trending over time. The credit score provided is a VantageScore 3.0 credit score based on Equifax data. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your credit worthiness.



Data Breach Notifications

How many organizations and companies store your information in their databases? Your information is virtually everywhere, from doctors, insurance companies, employers, even your favorite retailers. We let you know about large-scale breaches, so you can help protect your personal information.

NORTON WITH LIFELock BENEFIT PREMIER

One-Bureau

Three-Bureau

One-Bureau
Daily &
Three-Bureau
Monthly

One-Bureau

No one can prevent all identity theft or all cybercrime.

[§] These features are not enabled upon enrollment. Member must take action to get their protection. Does not include monitoring of chats or direct messages.

¹ If your plan includes credit reports, scores, and/or credit monitoring features ("Credit Features"), two requirements must be met to receive said features: (i) your identity must be successfully verified with Equifax; and (ii) Equifax must be able to locate your credit file and it must contain sufficient credit history information. IF EITHER OF THE FOREGOING REQUIREMENTS ARE NOT MET YOU WILL NOT RECEIVE CREDIT FEATURES FROM ANY BUREAU. If your plan also includes Credit Features from Experian and/or TransUnion, the above verification process must also be successfully completed with Experian and/or TransUnion, as applicable. If verification is successfully completed with Equifax, but not with Experian and/or TransUnion, as applicable, you will not receive Credit Features from such bureau(s) until the verification process is successfully completed and until then you will only receive Credit Features from Equifax. Any credit monitoring from Experian and TransUnion will take several days to begin after your successful plan enrollment. Please note that in order to enjoy all features in your chosen plan, such as bank account alerts, credit monitoring, and credit reports, it may require additional action from you and may not be available until completion.

² If your plan includes One Bureau Credit Application Alerts, two requirements must be met to receive said features: (i) your identity must be successfully verified with TransUnion; and (ii) TransUnion must be able to locate your credit file and it must contain sufficient credit history information. IF EITHER OF THE FOREGOING REQUIREMENTS ARE NOT MET YOU WILL NOT RECEIVE ONE BUREAU CREDIT APPLICATION ALERTS. One Bureau Credit Application Alerts will take several days to begin after your successful LifeLock plan enrollment.



Fictitious Identity Monitoring

Could someone use your Social Security number with someone else's name and address to commit identity theft? Yes, it's called synthetic identity theft. Criminals can use fake personal information connected to your identity to open accounts or commit fraud. We help protect your identity by scanning for names and addresses connected with your Social Security number.



Bank & Credit Card Activity Alerts^{†§}

Do your bank and credit card companies send you alerts to verify transactions? Centralize your banking alerts into one place with LifeLock Transaction Monitoring. Help protect your finances against fraud by monitoring existing accounts with alerts that notify you of cash withdrawals, balance transfers and large purchases.

- **Recurring Charge Alert[†]** We monitor your bank, savings and credit card transactions to help identify potential fraud. If a monthly recurring charge increases, we will alert you so you can take action if necessary.
- **Unusual Charge Alerts**



Phone Takeover Monitoring

Phone Takeover Monitoring helps protect against phone takeovers. We monitor your (mobile)phone number for potential takeovers including SIM card changes, carrier changes and line disconnections. Then we notify you so you can spot identity theft and take action if necessary.



Checking & Savings Account Application Alerts^{†§}

Continuously searches for your personal information in new bank account applications at national banks, local banks and credit unions from coast to coast.



Bank Account Takeover Alerts^{†§}

Smart identity thieves use their computers to take over accounts or add new account holders to existing accounts. LifeLock helps protect your finances by monitoring for these changes.



Court Records Scanning

We search for falsified court records containing your personal information to help protect you from arrest for crimes you haven't committed, monitor for fictitious identities using aliases with your Social Security number, and alert you of potentially fraudulent credit card activity.[†]

No one can prevent all identity theft or all cybercrime.

[†] The LifeLock alert network includes a variety of product features and data sources. Although its very extensive, our network does not cover all transactions at all businesses, so you might not receive a LifeLock alert in every single case.

[§] These features are not enabled upon enrollment. Member must take action to get their protection. Does not include monitoring of chats or direct messages.

Norton LifeLock Benefit Plans

NORTON WITH LIFELOCK
**BENEFIT
PREMIER**

LIFELOCK IDENTITY THEFT PROTECTION



401k & Investment Account Activity Alerts^{†§}

How often do you check your 401(k) balance? How soon would you find out if money was stolen? Investment and retirement accounts are often the lifeline for financial growth. We help you protect your nest egg by alerting you to withdrawals and balance transfers.



File Sharing Network Searches

We monitor and notify you if we see your personal information on file-sharing networks intended for music or photos.



Prior Identity Theft Remediation[§]

If you are a victim of a Prior Stolen Identity Event that involves the unauthorized use of your stolen Personally Identifiable Information for opening of new accounts with banks, merchants, public utilities and lenders, a LifeLock restoration specialist will review the case and determine what steps, if any, can be taken to remediate the issue.

This feature is separate from our Million Dollar Protection™ Package and does not provide coverage for lawyers and experts, reimbursement of stolen funds or compensation for personal expenses for events occurring during the 12 months prior to enrollment. See disclaimer for details.



Million Dollar Protection™ Package⁺⁺⁺

If you became a victim of identity theft, who could help you with reimbursement for identity theft losses and expenses? LifeLock helps protect you with our Million Dollar Protection™ Package. You will be covered for personal expenses you incur and money stolen as a result of identity theft, and we will provide lawyers and experts, up to \$1 million, if needed to help resolve your case.

- Up to \$1 Million for Stolen Funds Reimbursement
- Up to \$1 Million for Personal Expense Compensation
- Up to \$1 Million for Coverage for Lawyers and Experts



U.S.-based Identity Restoration Specialists

If your identity is compromised, an Identity Restoration Specialist will personally handle your case and help restore your identity.



24/7 Live Member Support

We have live Identity Protection Agents available to answer your questions.



Up to
\$1 Million each



No one can prevent all identity theft or all cybercrime.

[†] The LifeLock alert network includes a variety of product features and data sources. Although its very extensive, our network does not cover all transactions at all businesses, so you might not receive a LifeLock alert in every single case.

[§] These features are not enabled upon enrollment. Member must take action to get their protection. Does not include monitoring of chats or direct messages.

⁺⁺⁺ Reimbursement and Expense Compensation, each with limits of up to \$1 million for LifeLock with Norton Benefit Essential and LifeLock with Norton Benefit Premier and up to \$1 million for coverage for lawyers and experts if needed, for all plans. Benefits under the Master Policy are issued and covered by United Specialty Insurance Company (State National Insurance Company, Inc. for NY State members). Policy terms, conditions and exclusions at: [Lifelock.com/legal](https://www.lifelock.com/legal).

[§] Subject to eligibility requirements defined in Terms & Conditions at www.lifelock.com/legal/prior-id-theft-remediation. NortonLifeLock reserves the right to change and/or cease services at any time.

Norton LifeLock Benefit Plans

NORTON WITH LIFELOCK
**BENEFIT
PREMIER**

LIFELOCK ID THEFT PROTECTION



Stolen Wallet Protection

A stolen wallet could mean a stolen identity. Call us if your wallet is stolen and we'll help cancel or replace credit cards, driver's licenses, Social Security cards, insurance cards and more.



Reduced Pre-Approved Credit Card Offers

Pre-approved credit card offers can provide important information to identity thieves. LifeLock will request your name be removed from many pre-approved credit card mailing lists.



NORTON DEVICE SECURITY



Secures PCs, Mac & mobile devices[§]

Multi-layered, advanced security helps protect devices against existing and emerging malware threats, including ransomware, and helps protect private and financial information when employees go online.

Up to 5 devices
(Family gets
10 devices)



Online Threat Protection[§]

Advanced security helps protect your private and financial information when you go online.



Smart Firewall[§]

Helps protect your devices and the data they store from malicious attacks and intrusive eyes by monitoring and blocking suspicious network traffic.



Parental Control^{§§}

- Helps your kids explore the Web more safely by keeping you informed of which sites they are visiting so they can monitor for age-appropriate content
- Lets you create rules to restrict access to sites and create a whitelist of preferred sites

(Only available for Windows, Android and iOS)

- Helps your kids balance time spent online by letting you schedule screen-time limits for their device usage (only available for Windows, Android and iOS)

(Daily time limit functionality is not supported on iOS, but time curfew functionality is supported)

- Provides insights into the search terms and videos that interest your kids. Get detailed reports on what your kids are doing online, right in your Inbox or on the Parent Portal.













No one can prevent all identity theft or all cybercrime.

[§] These features are not enabled upon enrollment. Member must take action to get their protection. Does not include monitoring of chats or direct messages.

^{§§} Norton Family and Norton Parental Control can only be installed and used on a child's Windows PC, iOS and Android devices but not all features are available on all platforms. Parents can monitor and manage their child's activities from any device—Windows PC (excluding Windows 10 in S mode), Mac, iOS and Android -- via our mobile apps, or by signing into their account at my.Norton.com and selecting Parental Control via any browser. Mobile app must be downloaded separately. The iOS app is available in all except these countries.

Popular browsers are supported, including Chrome, Edge, and Firefox. Parental Control portal access is not supported on Internet Explorer. On iOS and Android, the in-app Norton Browser must be used to get the full benefit of the features.

Norton LifeLock Benefit Plans

		NORTON WITH LIFELOCK BENEFIT PREMIER
NORTON DEVICE SECURITY	 <p>Cloud Backup^{3\$} Cloud storage to store and protect important files and documents as a preventative measure to data loss due to hard drive failures, stolen devices and even ransomware.</p>	 50 GB
	 <p>Password Manager^{\$} Create, store, and manage your passwords, credit card information and other credentials online – safely and securely.</p>	
ONLINE PRIVACY	 <p>Norton Secure VPN^{\$} A virtual private network gives you online privacy and anonymity by creating a private network from a public Internet connection. With Norton Secure VPN, your data that you send and receive from your device like passwords and credit card numbers is encrypted and converted into an unreadable, untraceable format until it reaches NortonLifeLock servers.</p>	
	 <p>Privacy Monitor™ Privacy Monitor helps reduce public exposure of your personal information. We scan common public people-search websites for your personal information and help you opt-out, giving you peace of mind and greater control over your online privacy.</p>	
	 <p>SafeCam^{3\$} Your webcam is a great way to keep in touch with family, friends or business associates. But it can also be vulnerable to hacking. With SafeCam, you'll get notified when cybercriminals try to use your webcam, so we can help block them.</p>	

No one can prevent all identity theft or all cybercrime.

Not all products, services and features are available on all devices or operating systems. System requirement information on Norton.com

^{\$} These features are not enabled upon enrollment. Member must take action to get their protection. Does not include monitoring of chats or direct messages.

³ Norton Cloud Backup, Norton SafeCam, Norton Family, and Norton Parental Control features are not supported on Mac, Windows 10 in S mode, and Windows running on ARM processor).

Copyright © 2022 NortonLifeLock Inc. All rights reserved. NortonLifeLock, the NortonLifeLock Logo, the Checkmark Logo, Norton, LifeLock, and the LockMan Logo are trademarks or registered trademarks of NortonLifeLock Inc. or its affiliates in the United States and other countries. Other names may be trademarks of their respective owners. Norton Benefit Plans are part of NortonLifeLock Inc.

Enclosure 2

Notice to Unaffected Employees



Great Circle Catering • Seacoast Aviation • Air New England

February 22, 2024

Dear [REDACTED],

On February 14, 2024, Port City Air Inc. ("PCA") gave employees notice about a security breach of its payroll information. That day, by e-mail to PCA's "All Employees" distribution group, PCA explained the issue and outlined immediate steps you should take to help protect you and your fellow employees' data. This notice provides further information about the breach, steps we are taking, and steps we recommend that you take.

Our initial investigation indicates that your information was not included in this accidental transmission. That investigation is ongoing, so we are advising all employees to take the recommended precautions outlined in this letter and our other communications regarding this incident.

On February 14, 2024, PCA's payroll office was attempting to transmit information to PCA's 401(k) plan administrator. The transmission was made using PCA's payroll software produced by UKG. By accident, the software unintentionally transmitted that data via e-mail to current and former PCA personnel and one employee at UKG. The email included an attachment, generated for PCA's payroll purposes, that contains a list of each employee's name, Social Security Number, date of hire, gross pay, hours worked, and 401(k) contribution amount. The e-mail was sent to the e-mail addresses entered into PCA's payroll software. Some employees register personal e-mail addresses for payroll purposes, which means that some employees received the errant e-mail at their personal e-mail address.

PCA discovered this accident almost immediately after the e-mails were sent. Our IT department immediately became involved to understand and address the issue.. We notified all employees by a combination of e-mail and manager outreach and gave instructions to permanently delete the e-mail from all accounts and devices. We are in contact with UKG regarding this issue.

The same day, PCA gave follow-up advice that employees should, again, delete the e-mail, change their e-mail password, and set up multi-factor authentication for their work and personal e-mail accounts. While no passwords were disclosed in the security breach, changing your e-mail password and setting up multi-factor authentication is still an important safety tool to guard against theft.

PCA is investigating the matter and determining appropriate steps to avoid a repeat of this incident. We are also reviewing our policies and procedures on how to store and transmit sensitive data. PCA is in contact with UKG, to find a software-based solution to prevent this type of disclosure. PCA is also removing any personal e-mail addresses from the payroll systems: any current employee who does not



104 Grafton Drive
Portsmouth, NH 03801



tel: 603.430.1111
fax: 603.766.0266



info@portcityair.com
www.portcityair.com

currently have a PCA-issued e-mail account will soon be assigned one. That way, should there be an inadvertent disclosure in the future, the data should not leave PCA's IT environment.

We reiterate that employees should take protective steps, as outlined in PCA's prior communications, to change your e-mail passwords and set up multi-factor authentication for your e-mail and other personal accounts.

We are also providing you with a three-year subscription to Norton LifeLock at no cost to you. The enclosed handout explains the benefits that Norton LifeLock provides. In the coming days, you will receive an e-mail from Norton LifeLock, which will provide the necessary information to register for that service. Norton will send that e-mail to the e-mail address you had on file with PCA's payroll software as of February 14, 2024. **Please note that you must register for LifeLock, otherwise you will not receive its protections.**

If you would like to learn more about how to enroll in LifeLock, and see a product demonstration, please follow these QR codes:

We regret this accident and are committed to helping PCA employees take protective measures. If you have any questions, please contact Kathy Temple at

Sincerely,

Port City Air, Inc.



104 Grafton Drive
Portsmouth, NH 03801



tel: 603.430.1111
fax: 603.766.0266

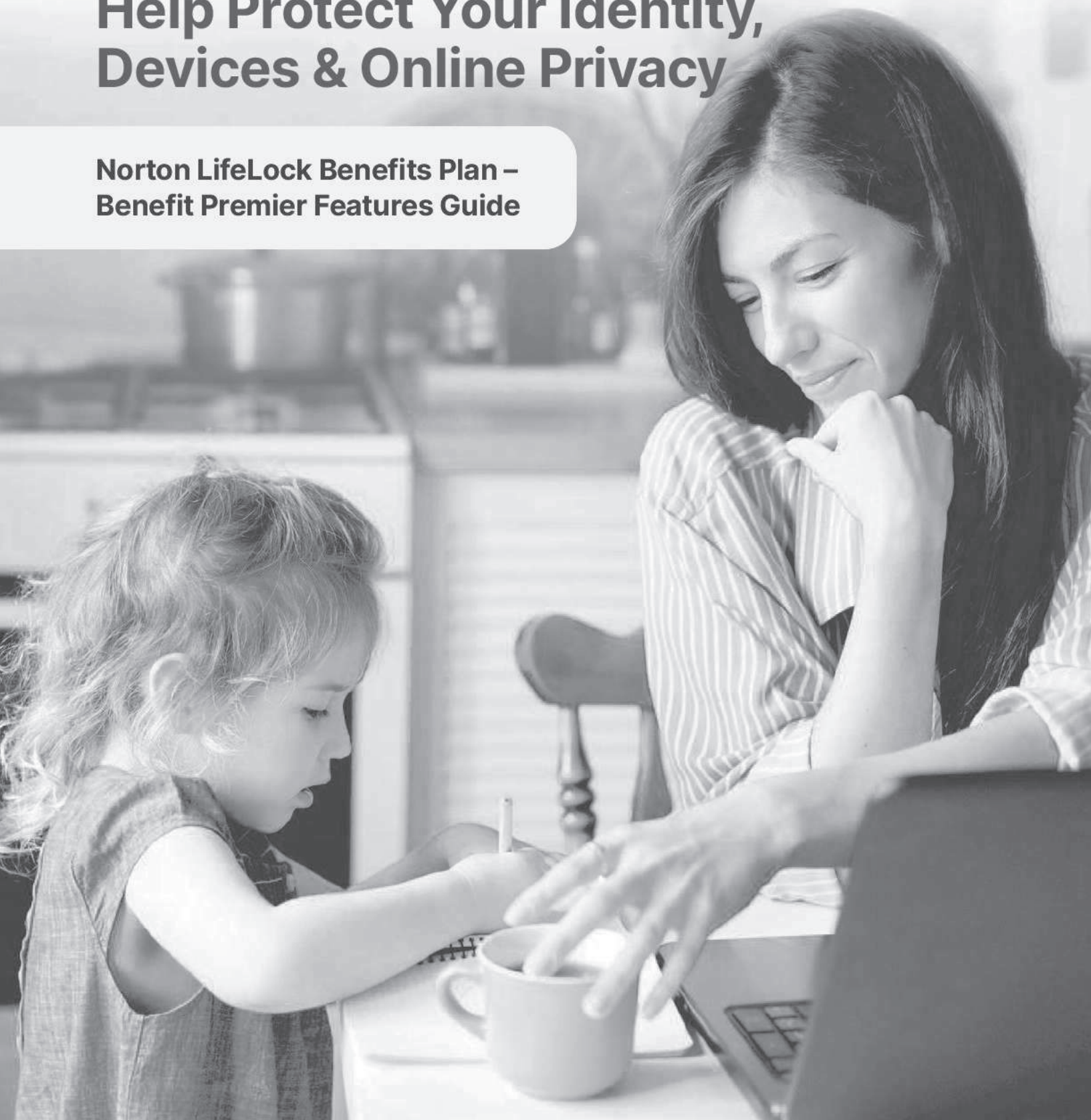


info@portcityair.com
www.portcityair.com



Your Employee Benefit Can Help Protect Your Identity, Devices & Online Privacy

**Norton LifeLock Benefits Plan –
Benefit Premier Features Guide**



Norton LifeLock Benefit Plans

NORTON WITH LIFELock
**BENEFIT
PREMIER**

LIFELock IDENTITY THEFT PROTECTION



Identity Lock^{1§}

Criminals can steal your identity to open credit cards, bank and utility accounts or even take out a loan in your name. With a single click, Identity Lock lets you lock your TransUnion credit¹ file to help protect against identity thieves from opening accounts or taking out loans in your name. And you can unlock it whenever you need to open a new credit account.

Locking or unlocking your credit file does not affect your credit score and does not stop all companies and agencies from pulling your credit file. The credit lock on your TransUnion file will be unlocked if your subscription is downgraded or canceled.



Social Media Monitoring*

Our Social Media Monitoring feature helps you keep your social media accounts safer. We monitor your linked accounts on the most popular social media sites and notify you if we think your account may be compromised or if we detect risky links.



Home Title Monitoring

Your home is likely your biggest asset, but how often do you monitor the title to your home? Someone could take out a loan and lien against your home[§] without your knowledge. We will monitor and notify you if we detect changes made at the county recorder's office** related to your home's title so you can take necessary action to protect your home.



Credit, Bank & Utility Account Freezes

Criminals can steal your identity to open credit cards, bank accounts or utilities in your name. We provide easy instructions and quick access so you can freeze credit, bank and utility files with each consumer reporting company to help protect against criminals using your information to open new accounts or take out loans in your name.



Mobile App (Android™ & iOS)§

Downloading the app does not provide protection.

With the mobile app, you will be able to receive alerts† via push notification and respond to them right away. If you tell us any activity looks suspicious, our LifeLock Identity Protection Agents will be able to help you.

No one can prevent all identity theft or all cybercrime.

[†] The LifeLock alert network includes a variety of product features and data sources. Although its very extensive, our network does not cover all transactions at all businesses, so you might not receive a LifeLock alert in every single case.

* Does not include monitoring of chats or direct messages.

• Home Title Monitoring feature includes your home, second home, rental home, or other properties where you have an ownership interest.

** In your state, the office that maintains real estate records could be known as a county recorder, registrar of deeds, clerk of the court, or some other government agency.

§ These features are not enabled upon enrollment. Member must take action to get their protection. Does not include monitoring of chats or direct messages.

¹ If your plan includes credit reports, scores, and/or credit monitoring features ("Credit Features"), two requirements must be met to receive said features: (i) your identity must be successfully verified with Equifax; and (ii) Equifax must be able to locate your credit file and it must contain sufficient credit history information. IF EITHER OF THE FOREGOING REQUIREMENTS ARE NOT MET YOU WILL NOT RECEIVE CREDIT FEATURES FROM ANY BUREAU. If your plan also includes Credit Features from Experian and/or TransUnion, the above verification process must also be successfully completed with Experian and/or TransUnion, as applicable. If verification is successfully completed with Equifax, but not with Experian and/or TransUnion, as applicable, you will not receive Credit Features from such bureau(s) until the verification process is successfully completed and until then you will only receive Credit Features from Equifax. Any credit monitoring from Experian and TransUnion will take several days to begin after your successful plan enrollment. Please note that in order to enjoy all features in your chosen plan, such as bank account alerts, credit monitoring, and credit reports, it may require additional action from you and may not be available until completion.



USPS Address Change Verification

Identity thieves try to divert mail to get important financial information. LifeLock lets you know of address change requests at the U.S. Postal Service linked to your identity.



LifeLock Identity Alert™ System†

It's the foundation for all LifeLock services. We monitor for fraudulent use of your Social Security number, name, address, or date of birth in applications for credit and services. The patented system sends alerts by text, phone#, email, or mobile app.



- **Payday Online Lending** detects† if someone attempts to obtain an online payday loan using your identity.
- **Telecom & Cable Applications** for new service.
- **Credit Alerts/Social Security Number Alerts†** include credit card and auto loan applications.
- **Identity Verification Monitoring†** Banks and other companies may attempt to verify your identity when you open a new credit card account, get a car loan, or even when logging into your banking account online. This is done by asking you questions only you should be able to answer, like the name of your best friend or by texting you a one-time usage code. But what happens if a cybercriminal is attempting to impersonate you to open new accounts? We monitor our network and alert you if we detect a bank, utility or other company attempting to verify your identity so you can take action to help protect your identity, if this was not initiated by you.



Dark Web Monitoring§

Identity thieves can buy or sell your personal information on hard-to-find dark web sites and forums. LifeLock patrols the dark web and notifies you if we find your information.



- **Password Combo List§** Provides notifications when we find your username/email and password paired together on the dark web so you can take action to protect your information.
- **Gamer Tags§** You may add up to 10 gamer tags in your portal, and we'll notify you if any are found on the dark web.



Sex Offender Registry Reports

Receive notifications if your name and personal information appear in a sex offender registry.



No one can prevent all identity theft or all cybercrime.

† The LifeLock alert network includes a variety of product features and data sources. Although its very extensive, our network does not cover all transactions at all businesses, so you might not receive a LifeLock alert in every single case.

‡ Phone alerts made during normal local business hours.

§ These features are not enabled upon enrollment. Member must take action to get their protection. Does not include monitoring of chats or direct messages.

Norton LifeLock Benefit Plans

LIFELock IDENTITY THEFT PROTECTION



Credit Application Alerts^{2§}

We monitor your credit file at a leading credit bureau and provide alerts for any new credit applications to help detect fraud.



Credit Monitoring^{1§}

Credit Monitoring is one of the critically important dimensions to monitor to detect potential identity theft issues as changes are made to your credit file. As a LifeLock with Norton Benefit Plan member, we monitor key changes to your credit file at one or three of the leading credit bureaus, depending on your plan, and alert you to help detect fraud.



Credit Reports & Credit Scores^{1§}

Online access to your credit reports and credit scores from the primary bureaus. It's a convenient way to see details of your credit history over the past year.

The credit scores provided are VantageScore 3.0 credit scores based on data from Equifax, Experian and TransUnion respectively. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your creditworthiness

- **Credit on-demand** Get your latest credit reports and credit scores¹ when you need them. If you select LifeLock with Norton Benefit Premier, you will have the benefit of Three-Bureau Annual Credit Reports and Credit Scores¹ and you'll be notified when your annual reports and scores are available for review.



Monthly Credit Score Tracking^{1§}

This monthly one-bureau credit score tracker helps you identify important changes and see how your credit is trending over time. The credit score provided is a VantageScore 3.0 credit score based on Equifax data. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your credit worthiness.



Data Breach Notifications

How many organizations and companies store your information in their databases? Your information is virtually everywhere, from doctors, insurance companies, employers, even your favorite retailers. We let you know about large-scale breaches, so you can help protect your personal information.

NORTON WITH LIFELock BENEFIT PREMIER

One-Bureau

Three-Bureau

One-Bureau
Daily &
Three-Bureau
Monthly

One-Bureau

No one can prevent all identity theft or all cybercrime.

[§] These features are not enabled upon enrollment. Member must take action to get their protection. Does not include monitoring of chats or direct messages.

¹ If your plan includes credit reports, scores, and/or credit monitoring features ("Credit Features"), two requirements must be met to receive said features: (i) your identity must be successfully verified with Equifax; and (ii) Equifax must be able to locate your credit file and it must contain sufficient credit history information. IF EITHER OF THE FOREGOING REQUIREMENTS ARE NOT MET YOU WILL NOT RECEIVE CREDIT FEATURES FROM ANY BUREAU. If your plan also includes Credit Features from Experian and/or TransUnion, the above verification process must also be successfully completed with Experian and/or TransUnion, as applicable. If verification is successfully completed with Equifax, but not with Experian and/or TransUnion, as applicable, you will not receive Credit Features from such bureau(s) until the verification process is successfully completed and until then you will only receive Credit Features from Equifax. Any credit monitoring from Experian and TransUnion will take several days to begin after your successful plan enrollment. Please note that in order to enjoy all features in your chosen plan, such as bank account alerts, credit monitoring, and credit reports, it may require additional action from you and may not be available until completion.

² If your plan includes One Bureau Credit Application Alerts, two requirements must be met to receive said features: (i) your identity must be successfully verified with TransUnion; and (ii) TransUnion must be able to locate your credit file and it must contain sufficient credit history information. IF EITHER OF THE FOREGOING REQUIREMENTS ARE NOT MET YOU WILL NOT RECEIVE ONE BUREAU CREDIT APPLICATION ALERTS. One Bureau Credit Application Alerts will take several days to begin after your successful LifeLock plan enrollment.



Fictitious Identity Monitoring

Could someone use your Social Security number with someone else's name and address to commit identity theft? Yes, it's called synthetic identity theft. Criminals can use fake personal information connected to your identity to open accounts or commit fraud. We help protect your identity by scanning for names and addresses connected with your Social Security number.



Bank & Credit Card Activity Alerts^{†§}

Do your bank and credit card companies send you alerts to verify transactions? Centralize your banking alerts into one place with LifeLock Transaction Monitoring. Help protect your finances against fraud by monitoring existing accounts with alerts that notify you of cash withdrawals, balance transfers and large purchases.

- **Recurring Charge Alert[†]** We monitor your bank, savings and credit card transactions to help identify potential fraud. If a monthly recurring charge increases, we will alert you so you can take action if necessary.
- **Unusual Charge Alerts**



Phone Takeover Monitoring

Phone Takeover Monitoring helps protect against phone takeovers. We monitor your (mobile)phone number for potential takeovers including SIM card changes, carrier changes and line disconnections. Then we notify you so you can spot identity theft and take action if necessary.



Checking & Savings Account Application Alerts^{†§}

Continuously searches for your personal information in new bank account applications at national banks, local banks and credit unions from coast to coast.



Bank Account Takeover Alerts^{†§}

Smart identity thieves use their computers to take over accounts or add new account holders to existing accounts. LifeLock helps protect your finances by monitoring for these changes.



Court Records Scanning

We search for falsified court records containing your personal information to help protect you from arrest for crimes you haven't committed, monitor for fictitious identities using aliases with your Social Security number, and alert you of potentially fraudulent credit card activity.[†]

No one can prevent all identity theft or all cybercrime.

[†] The LifeLock alert network includes a variety of product features and data sources. Although its very extensive, our network does not cover all transactions at all businesses, so you might not receive a LifeLock alert in every single case.

[§] These features are not enabled upon enrollment. Member must take action to get their protection. Does not include monitoring of chats or direct messages.

Norton LifeLock Benefit Plans

NORTON WITH LIFELock
**BENEFIT
PREMIER**

LIFELock IDENTITY THEFT PROTECTION



401k & Investment Account Activity Alerts^{†§}

How often do you check your 401(k) balance? How soon would you find out if money was stolen? Investment and retirement accounts are often the lifeline for financial growth. We help you protect your nest egg by alerting you to withdrawals and balance transfers.



File Sharing Network Searches

We monitor and notify you if we see your personal information on file-sharing networks intended for music or photos.



Prior Identity Theft Remediation[§]

If you are a victim of a Prior Stolen Identity Event that involves the unauthorized use of your stolen Personally Identifiable Information for opening of new accounts with banks, merchants, public utilities and lenders, a LifeLock restoration specialist will review the case and determine what steps, if any, can be taken to remediate the issue.

This feature is separate from our Million Dollar Protection™ Package and does not provide coverage for lawyers and experts, reimbursement of stolen funds or compensation for personal expenses for events occurring during the 12 months prior to enrollment. See disclaimer for details.



Million Dollar Protection™ Package⁺⁺⁺

If you became a victim of identity theft, who could help you with reimbursement for identity theft losses and expenses? LifeLock helps protect you with our Million Dollar Protection™ Package. You will be covered for personal expenses you incur and money stolen as a result of identity theft, and we will provide lawyers and experts, up to \$1 million, if needed to help resolve your case.

- Up to \$1 Million for Stolen Funds Reimbursement
- Up to \$1 Million for Personal Expense Compensation
- Up to \$1 Million for Coverage for Lawyers and Experts



U.S.-based Identity Restoration Specialists

If your identity is compromised, an Identity Restoration Specialist will personally handle your case and help restore your identity.



24/7 Live Member Support

We have live Identity Protection Agents available to answer your questions.

Up to
\$1 Million each

No one can prevent all identity theft or all cybercrime.

[†] The LifeLock alert network includes a variety of product features and data sources. Although its very extensive, our network does not cover all transactions at all businesses, so you might not receive a LifeLock alert in every single case.

[§] These features are not enabled upon enrollment. Member must take action to get their protection. Does not include monitoring of chats or direct messages.

⁺⁺⁺ Reimbursement and Expense Compensation, each with limits of up to \$1 million for LifeLock with Norton Benefit Essential and LifeLock with Norton Benefit Premier and up to \$1 million for coverage for lawyers and experts if needed, for all plans. Benefits under the Master Policy are issued and covered by United Specialty Insurance Company (State National Insurance Company, Inc. for NY State members). Policy terms, conditions and exclusions at: [lifelock.com/legal](https://www.lifelock.com/legal).

[§] Subject to eligibility requirements defined in Terms & Conditions at www.lifelock.com/legal/prior-id-theft-remediation. NortonLifeLock reserves the right to change and/or cease services at any time.

Norton LifeLock Benefit Plans

NORTON WITH LIFELOCK
**BENEFIT
PREMIER**

LIFELOCK ID THEFT PROTECTION



Stolen Wallet Protection

A stolen wallet could mean a stolen identity. Call us if your wallet is stolen and we'll help cancel or replace credit cards, driver's licenses, Social Security cards, insurance cards and more.



Reduced Pre-Approved Credit Card Offers

Pre-approved credit card offers can provide important information to identity thieves. LifeLock will request your name be removed from many pre-approved credit card mailing lists.



NORTON DEVICE SECURITY



Secures PCs, Mac & mobile devices[§]

Multi-layered, advanced security helps protect devices against existing and emerging malware threats, including ransomware, and helps protect private and financial information when employees go online.

Up to 5 devices
(Family gets
10 devices)



Online Threat Protection[§]

Advanced security helps protect your private and financial information when you go online.



Smart Firewall[§]

Helps protect your devices and the data they store from malicious attacks and intrusive eyes by monitoring and blocking suspicious network traffic.



Parental Control^{§§}

- Helps your kids explore the Web more safely by keeping you informed of which sites they are visiting so they can monitor for age-appropriate content
- Lets you create rules to restrict access to sites and create a whitelist of preferred sites

(Only available for Windows, Android and iOS)

- Helps your kids balance time spent online by letting you schedule screen-time limits for their device usage (only available for Windows, Android and iOS)

(Daily time limit functionality is not supported on iOS, but time curfew functionality is supported)

- Provides insights into the search terms and videos that interest your kids. Get detailed reports on what your kids are doing online, right in your Inbox or on the Parent Portal.













No one can prevent all identity theft or all cybercrime.

[§] These features are not enabled upon enrollment. Member must take action to get their protection. Does not include monitoring of chats or direct messages.

^{§§} Norton Family and Norton Parental Control can only be installed and used on a child's Windows PC, iOS and Android devices but not all features are available on all platforms. Parents can monitor and manage their child's activities from any device—Windows PC (excluding Windows 10 in S mode), Mac, iOS and Android -- via our mobile apps, or by signing into their account at my.Norton.com and selecting Parental Control via any browser. Mobile app must be downloaded separately. The iOS app is available in all except these countries.

Popular browsers are supported, including Chrome, Edge, and Firefox. Parental Control portal access is not supported on Internet Explorer. On iOS and Android, the in-app Norton Browser must be used to get the full benefit of the features.

Norton LifeLock Benefit Plans

		NORTON WITH LIFELOCK BENEFIT PREMIER
NORTON DEVICE SECURITY	 <p>Cloud Backup^{3\$} Cloud storage to store and protect important files and documents as a preventative measure to data loss due to hard drive failures, stolen devices and even ransomware.</p>	 50 GB
	 <p>Password Manager^{\$} Create, store, and manage your passwords, credit card information and other credentials online – safely and securely.</p>	
ONLINE PRIVACY	 <p>Norton Secure VPN^{\$} A virtual private network gives you online privacy and anonymity by creating a private network from a public Internet connection. With Norton Secure VPN, your data that you send and receive from your device like passwords and credit card numbers is encrypted and converted into an unreadable, untraceable format until it reaches NortonLifeLock servers.</p>	
	 <p>Privacy Monitor™ Privacy Monitor helps reduce public exposure of your personal information. We scan common public people-search websites for your personal information and help you opt-out, giving you peace of mind and greater control over your online privacy.</p>	
	 <p>SafeCam^{3\$} Your webcam is a great way to keep in touch with family, friends or business associates. But it can also be vulnerable to hacking. With SafeCam, you'll get notified when cybercriminals try to use your webcam, so we can help block them.</p>	

No one can prevent all identity theft or all cybercrime.

Not all products, services and features are available on all devices or operating systems. System requirement information on Norton.com

^{\$} These features are not enabled upon enrollment. Member must take action to get their protection. Does not include monitoring of chats or direct messages.

³ Norton Cloud Backup, Norton SafeCam, Norton Family, and Norton Parental Control features are not supported on Mac, Windows 10 in S mode, and Windows running on ARM processor).

Copyright © 2022 NortonLifeLock Inc. All rights reserved. NortonLifeLock, the NortonLifeLock Logo, the Checkmark Logo, Norton, LifeLock, and the LockMan Logo are trademarks or registered trademarks of NortonLifeLock Inc. or its affiliates in the United States and other countries. Other names may be trademarks of their respective owners. Norton Benefit Plans are part of NortonLifeLock Inc.