

# McDonald Hopkins

A business advisory and advocacy law firm

James J. Giszczak  
Direct Dial: 248-220-1354  
E-mail: [jgiszczak@mcdonaldhopkins.com](mailto:jgiszczak@mcdonaldhopkins.com)

McDonald Hopkins PLC  
39533 Woodward Avenue  
Suite 318  
Bloomfield Hills, MI 48304

P 1.248.646.5070  
F 1.248.646.5075

August 5, 2022

## VIA U.S. MAIL

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

RECEIVED

AUG 10 2022

CONSUMER PROTECTION

**Re: Primeritus Financial Services, Inc. – Incident Notification**

Dear Attorney General Formella:

McDonald Hopkins PLC represents Primeritus Financial Services, Inc. ("Primeritus Financial Services"). I am writing to provide notification of an incident at Primeritus Financial Services that may affect the security of personal information of two (2) New Hampshire residents. The investigation of Primeritus Financial Services is ongoing, and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, Primeritus Financial Services does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Primeritus Financial Services learned recently that an unauthorized individual obtained access to one employee email account between August 9, 2021 and August 19, 2021. Upon learning of this issue, Primeritus Financial Services immediately commenced a prompt and thorough investigation and took steps to contain the incident. As part of this investigation, Primeritus Financial Services has been working very closely with external cybersecurity professionals experienced in handling these types of incidents. Primeritus Financial Services devoted considerable time and effort to determine what information was contained in the impacted account. Based on this comprehensive investigation and manual document review, Primeritus Financial Services discovered on July 6, 2022 that the compromised email account contained a limited amount of personal information, including the affected residents' full names, Social Security numbers, and driver's license and/or state identification numbers.

Primeritus Financial Services has no indication that any information has been misused. Nevertheless, out of an abundance of caution, Primeritus Financial Services wanted to inform you (and the affected residents) of the incident and to explain the steps that it is taking to help safeguard the affected residents against identity fraud. Primeritus Financial Services is providing the affected residents with notification of this incident commencing on or about August 5, 2022 in substantially the same form as the letter attached hereto. Primeritus Financial Services is providing the affected residents with 24 months of credit monitoring, and advising the affected residents to always remain vigilant in reviewing financial account statements for fraudulent or

August 5, 2022

Page 2

irregular activity on a regular basis. Primeritus Financial Services is advising the affected residents about the process for placing a fraud alert and/or security freeze on their credit files and obtaining free credit reports. The affected residents are also being provided with the contact information for the consumer reporting agencies and the Federal Trade Commission.

At Primeritus Financial Services, protecting the privacy of personal information is a top priority. Primeritus Financial Services is committed to maintaining the privacy of personal information in its possession and has taken many precautions to safeguard it. Primeritus Financial Services continually evaluates and modifies its practices and internal controls to enhance the security and privacy of personal information.

Should you have any questions regarding this notification, please contact me at (248) 220-1354 or [jgiszczak@mcdonaldhopkins.com](mailto:jgiszczak@mcdonaldhopkins.com). Thank you for your cooperation.

Sincerely,

James J. Giszczak

Encl.

Primeritus Financial Services  
[REDACTED]  
[REDACTED]



To Enroll, Please Call:

Or Visit:

Dear [REDACTED]

The privacy and security of your personal information is of the utmost importance to Primeritus Financial Services, Inc. ("Primeritus"). We are writing with important information regarding a recent data security incident that may have involved some of your information. We want to provide you with information about the incident, tell you about the services that we are providing to you, and let you know that we continue to take significant measures to protect your information.

What Happened?

An unauthorized party obtained access to one (1) Primeritus employee email account.

What We Are Doing.

Upon learning of this issue, we secured the account and commenced a prompt and thorough investigation. As part of our investigation, we have worked very closely with external cybersecurity professionals. After an extensive forensic investigation and manual document review, we discovered on July 6, 2022 that the email account that was accessed between August 9, 2021 and August 19, 2021 contained some of your personal information.

What Information Was Involved.

The accessed account contained some of your personal information, specifically your [REDACTED]

What You Can Do.

**We have no evidence that any of your information has been misused.** Nevertheless, out of an abundance of caution, we want to make you aware of the incident. To protect you and your information, however, we are providing you with 24 months of free credit monitoring and identity theft protection services through IDX. IDX identity protection services includes: 24 months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

This letter also provides other precautionary measures you can take to protect your personal information, including placing a fraud alert and/or security freeze on your credit files, and/or obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis.

For More Information.

Please accept our apologies that this incident occurred. We remain fully committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices to enhance the security and privacy of your personal information.

**If you have any further questions regarding this incident, please call our dedicated and confidential toll-free response line that we have set up to respond to questions at [REDACTED].** This response line is staffed with professionals familiar with this incident and knowledgeable on what you can do to protect against misuse of your information. The response line is available Monday through Friday, [REDACTED]

Sincerely,

Primeritus Financial Services, Inc.

**- OTHER IMPORTANT INFORMATION -**

**1. Enrolling in Complimentary 24-Month Credit Monitoring.**

**Activate IDX Identity Protection Membership Now in Three Easy Steps**

1. ENROLL by: [REDACTED] (Your code will not work after this date.)
2. VISIT the **IDX website** to enroll: [REDACTED]
3. PROVIDE the **Enrollment Code** [REDACTED]

**Activate the credit monitoring** provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

If you have questions about the product or if you would like to enroll over the phone, please contact IDX at [REDACTED]

**2. Placing a Fraud Alert on Your Credit File.**

Whether or not you choose to use the complimentary 24-month credit monitoring services, we recommend that you place an initial one (1) year "Fraud Alert" on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

***Equifax***

P.O. Box 105788  
Atlanta, GA 30348  
<https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>  
(800) 525-6285

***Experian***

P.O. Box 9554  
Allen, TX 75013  
<https://www.experian.com/fraud/center.html>  
(888) 397-3742

***TransUnion LLC***

P.O. Box 6790  
Fullerton, PA 92834-6790  
<https://www.transunion.com/fraud-alerts>  
(800) 680-7289

**3. Consider Placing a Security Freeze on Your Credit File.**

If you are very concerned about becoming a victim of fraud or identity theft, you may request a "Security Freeze" be placed on your credit file, at no charge. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by contacting all three nationwide credit reporting companies at the numbers below and following the stated directions or by sending a request in writing, by mail, to all three credit reporting companies:

***Equifax Security Freeze***

P.O. Box 105788  
Atlanta, GA 30348  
<https://www.equifax.com/personal/credit-report-services/credit-freeze/>  
(800) 349-9960

***Experian Security Freeze***

P.O. Box 9554  
Allen, TX 75013  
<http://experian.com/freeze>  
(888) 397-3742

***TransUnion Security Freeze***

P.O. Box 2000  
Chester, PA 19016  
<http://www.transunion.com/security-freeze>  
(888) 909-8872

In order to place the security freeze, you'll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.



If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name, or to commit fraud or other crimes against you, you may file a police report in the city in which you currently reside.

If you do place a security freeze *prior* to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

#### **4. Obtaining a Free Credit Report.**

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at **[www.annualcreditreport.com](http://www.annualcreditreport.com)**. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

#### **5. Additional Helpful Resources.**

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. Checking your credit report 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 local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft), by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.

If this notice letter states that your financial account information was impacted, we recommend that you contact your financial institution to inquire about steps to take to protect your account, including whether you should close your account or obtain a new account number.

**Iowa Residents:** You may contact law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity Theft: Office of the Attorney General of Iowa, Consumer Protection Division, Hoover State Office Building, 1305 East Walnut Street, Des Moines, IA 50319, [www.iowaattorneygeneral.gov](http://www.iowaattorneygeneral.gov), Telephone: 515-281-5164.

**North Carolina Residents:** You may obtain information about preventing identity theft from the North Carolina Attorney General's Office: Office of the Attorney General of North Carolina, Department of Justice, 9001 Mail Service Center, Raleigh, NC 27699-9001, [www.ncdoj.gov/](http://www.ncdoj.gov/), Telephone: 877-566-7226.