mwe.com

Shawn Helms Attorney at Law shelms@mwe.com +1 214 295 8090

RECEIVED

APR 2 3 2020

CONSUMER PROTECTION

April 17, 2020

VIA PRIORITY MAIL New Hampshire Department of Justice Attention: Data Breach Notifications 33 Capitol Street Concord, N 03301 Telephone: 603-271-3658

Re: SWAPA - Security Incident Notification

To Whom It May Concern:

We represent Southwest Airlines Pilots' Association ("SWAPA") with respect to a data security event involving potential exposure of certain personal information described in detail below. SWAPA is the sole bargaining unit for the over 9,700 Pilots of Southwest Airlines. SWAPA takes the security of personal information in its control seriously and has taken steps intended to prevent a similar event in the future.

1. Nature of the Security Incident

SWAPA detected unauthorized access to certain SWAPA employee Office 365 accounts beginning on January 25, 2020. Upon learning of the incident, SWAPA took immediate action to contain the incident and promptly engaged a leading cybersecurity forensic vendor to investigate the incident and perform an extensive review of those affected email accounts. On March 19, 2020, SWAPA determined through forensic e-discovery that the information contained in the Office 365 accounts included names, addresses, Social Security numbers, and financial account information.

2. Steps Taken in Response to the Security Incident

Immediately upon learning of the situation, SWAPA terminated the unauthorized user's access to the email accounts, reset the passwords of the email accounts involved, and engaged the assistance of a leading cybersecurity forensics firm to investigate the incident. SWAPA has enabled multifactor authentication security, provides annual cybersecurity training to all SWAPA employees, and in this instance, SWAPA provided remedial training to the employees whose email accounts were involved.



In addition, SWAPA has offered to each impacted individual for Experian to provide 24 months of complimentary credit monitoring and other identity theft protection services to the impacted individuals.

3. Number of New Hampshire Residents Impacted

SWAPA has identified three (3) New Hampshire residents who were potentially impacted by this incident. A notification letter will be sent to each of these individuals on April 17, 2020 via regular mail. A copy of the form notification letter is enclosed.

4. Contact Information

Please contact me at shelms@mwe.com or 214 295 8090 if you have any questions.

Sincerely,

m CH/s

Shawn Helms enclosures

April 17, 2020

Southwest Airlines Pilots' Association Return Mail Processing PO Box 589 Claysburg, PA 16625-0589

NOTICE OF DATA BREACH

Dear Sample A Sample:

We are sending you this notice because of a recent data security incident that occurred at Southwest Airlines Pilots' Association (SWAPA) that may have involved your personal information. At this time, we are not aware of any misuse of your information.

WHAT HAPPENED?

An unauthorized person gained access to the Office 365 accounts of two SWAPA employees. We worked with a leading cybersecurity forensics firm to investigate this matter and determined that the unauthorized person gained access to the first account on January 25, 2020 and the second account on February 10, 2020. SWAPA identified and terminated the unauthorized access. As part of our investigation, we conducted an extensive review of the employees' Office 365 accounts and, on March 19, 2020, we discovered messages in the accounts' mailboxes that contain certain information about you. Importantly, there is no evidence that your information has been misused or further disclosed.

WHAT INFORMATION WAS INVOLVED?

The information included in the Office 365 accounts may have contained your name, address, Extral, Ext

WHAT WE ARE DOING

SWAPA takes the protection of your personal information very seriously, and we are committed to protecting it. Upon learning of the situation, we immediately terminated the unauthorized person's access, began an investigation, and enlisted the assistance of a leading cybersecurity forensics firm to investigation this matter. As a result of this investigation, we are evaluating if increases to our security controls are necessary.

As noted above, there is no indication that your personal information has been misused at this time. Nevertheless, as an added precaution, SWAPA would like to offer you 24 months of credit monitoring from Experian at no cost to you. If you would like to put such monitoring in place, you can activate the credit monitoring product by taking the following steps no later than July 31, 2020.

- 1. VISIT the Web Site https://www.experianidworks.com/credit2 or call (855) 223-4828.
- 2. PROVIDE your Activation Code: and Engagement Number:



WHAT YOU CAN DO

In addition to enrolling in the identity monitoring services we have arranged on your behalf, we encourage you to review the "General Information About Identity Theft Protection" sheet enclosed with this letter. You should always remain vigilant for threats of fraud and identity theft by regularly reviewing your account statements and credit reports for errors or fraud.

FOR MORE INFORMATION

We apologize for any inconvenience that this incident may cause you. If you have any questions or concerns, please contact (855) 223-4828.

You may also contact us by mail at:

Southwest Airlines Pilots' Association 1450 Empire Central, Ste. 737 Dallas, TX 75247

Sincerely,

Jon Weaks President Southwest Airlines Pilots' Association

GENERAL INFORMATION ABOUT IDENTITY THEFT PROTECTION

You should remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

Credit Reports. Under federal law, you are entitled to one free copy of your credit report every 12 months from each of the three nationwide credit reporting agencies. You may obtain a free copy of your credit report by going to www.AnnualCreditReport.com or by calling (877) 322-8228. You also may complete the Annual Credit Report Request Form available from the FTC at www.consumer.ftc.gov/articles/pdf-0093-annual-report-request-form.pdf, and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

You may contact the nationwide credit reporting agencies at:

| Equifax | Experian | TransUnion |
|-------------------|------------------|--------------------|
| P.O. Box 105788 | P.O. Box 9554 | P.O. Box 2000 |
| Atlanta, GA 30348 | Allen, TX 75013 | Chester, PA 19016 |
| www.equifax.com | www.experian.com | www.transunion.com |
| (800) 525-6285 | (888) 397-3742 | (800) 680-7289 |

Fraud Alert. You may place a fraud alert in your file by calling one of the three nationwide credit reporting agencies above. A fraud alert tells creditors to follow certain procedures, including contacting you before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit.

Place a Security Freeze on your Credit Report. You also have the right to place a security freeze on your credit report by contacting any of the credit bureaus listed at above. A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent. To place a security freeze on your credit report, you may be able to use an online process, an automated telephone line or a written request. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. You can place a freeze and lift a security freeze on your credit report free of charge.

You may contact the Federal Trade Commission (FTC) and State Attorneys General Offices. If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should contact the FTC and/or your state's attorney general office about for information on how to prevent or avoid identity theft. You can contact the FTC at: Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20508, <u>www.ftc.gov</u>, 1-877-IDTHEFT (438-4338).

If you are an Iowa resident, state law advises you to report any suspected identity theft to local law enforcement or to the Iowa Attorney General, Consumer Protection Division, 1305 E. Walnut St., Des Moines, IA 50319, 1-888-777-4590.

If you are a Maryland resident, for steps you can take to avoid identity theft, you can contact the Maryland Office of the Attorney General, Consumer Protection Division at: 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us, 1-888-743-0023



If you are a New Mexico resident, you have certain rights pursuant to the federal Fair Credit Reporting Act (FCRA). For more information about the FCRA, please visit <u>www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf</u> or <u>www.ftc.gov</u>.

If you are a New York resident, you may visit the New York State Division for Consumer Protection's website at <u>https://dos.ny.gov/consumerprotection/identity_theft/index.htm</u> or call their Consumer Helpline at (800) 697-1220.

If you are a North Carolina resident, to obtain information about preventing identity theft, you may contact the North Carolina Office of the Attorney General, Consumer Protection Division at: 9001 Mail Service Center, Raleigh, NC 27699-9001, <u>www.ncdoj.com</u>, 1-877-566-7226

If you are an Oregon resident, state law advises you to report any suspected identity theft to law enforcement, the attorney general, or to the FTC.

If you are a Rhode Island resident, you can contact the Office of the Attorney General at: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, <u>http://www.riag.ri.gov/</u>, (401) 274-4400.