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July 26, 2021

VIA EMAIL (DOJ-CPB@DOJ.NH.GOV)

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

Re: Incident Notification

Dear Attorney General Formella:

We are writing on behalf of our client, Transform SR Holding Management LLC (“Transformco”), to provide notice of a security incident involving residents of New Hampshire.¹

Transformco recently concluded its investigation of a security incident involving suspicious activity in its network. Upon learning of the incident, Transformco immediately took steps to secure the systems and launched an investigation with the assistance of an outside IT security firm. Through this investigation, Transformco determined that an unauthorized party accessed some of its computer servers between June 3, 2021 and June 15, 2021.

On June 24, 2021, Transformco determined that certain files on its computer network may have been accessed by the unauthorized party. Some of the files contained the name and one or more of: Social Security number, financial account number and/or healthcare insurance information of certain New Hampshire residents.

Transformco was not able to identify the specific individuals whose personal information was potentially accessed by the unauthorized party. Consequently, Transformco is providing substitute notice today by issuing a press release, posting a statement on the Transformco corporate website, and emailing its employees. Copies of the press release, website statement and email notice are attached. Transformco has encouraged individuals to remain vigilant by reviewing their credit report, financial account statements and statements by healthcare providers. Transformco

¹ This notice is not, and does not constitute, a waiver of Transformco’s objection that New Hampshire lacks personal jurisdiction over it regarding any claims related to this data security incident.

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is also offering credit monitoring and identity theft protection services through Kroll and has established a dedicated, toll-free call center for individuals to call and obtain more information regarding the incident.

To help prevent a similar incident from occurring in the future, Transformco is implementing additional security measures to enhance the security of its network and continuing to provide training to its employees concerning phishing threats.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dan Pepper", written over a light gray horizontal line.

Daniel A. Pepper
Partner

Enclosure

TRANSFORMCO

NOTICE OF DATA BREACH

<<Date>>

To: All Associates

Transformco understands the importance of protecting the privacy and security of the information we maintain. We are writing to inform you of a data security incident that may have involved some of your information. This notice explains the incident, measures we have taken, and some steps you can take in response.

WHAT HAPPENED?

We recently identified suspicious activity in our network. In response, we immediately secured the systems involved and commenced an investigation. The investigation determined that an unauthorized party accessed some of our computer servers between June 3, 2021 and June 15, 2021.

WHAT INFORMATION WAS INVOLVED?

On June 24, 2021, we determined that certain files on Transformco's computer network may have been accessed by the unauthorized party. Certain of the files contained Social Security numbers, financial account numbers, and/or healthcare insurance information about current and former Transformco employees.

WHAT YOU CAN DO.

We encourage you to remain vigilant by regularly reviewing your credit reports, financial account statements, and statements you receive from healthcare providers for any unauthorized activity. If you see charges or activity you did not authorize, please contact the relevant provider immediately. We are also providing a complimentary membership to Kroll's identity monitoring services to current and former employees who believes that they may have been affected by this incident. Kroll's identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration. For more information on identity theft prevention and Kroll Identity Monitoring, including instructions on how to activate your complimentary membership, please call our dedicated call center for this incident at 855-545-1937.

WHAT WE ARE DOING.

To help prevent a similar incident from occurring in the future, we are implementing additional security measures to enhance the security of our network and continuing to provide training to our employees concerning phishing threats.

FOR MORE INFORMATION.

If you have any questions, please call our dedicated call center at 855-545-1937 Monday through Friday from 8:00 am to 5:30 pm Central Time.

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity over the next 12 to 24 months. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

Fraud Alerts and Credit or Security Freezes

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, www.transunion.com
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com

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 bureau will provide you with 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.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove

it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

You can contact Transformco via U.S. mail at 3333 Beverly Road, Hoffman Estates, IL 60179 or via telephone at (847) 286-2500.

Additional Information for Residents of the Following States

Connecticut: You may contact and obtain information from your state attorney general at: *Connecticut Attorney General's Office*, 165 Capitol Ave, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag

District of Columbia: You may contact and obtain information from your attorney general at: Office of the Attorney General for the District of Columbia, 441 4th Street, NW, Washington, DC 20001, 1-202-727-3400, www.oag.dc.gov

Maryland: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us

Massachusetts: Under Massachusetts law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: *Office of the Massachusetts Attorney General*, One Ashburton Place, Boston, MA 02108, 1-617-727-8400, www.mass.gov/ago/contact-us.html

New York: You may contact and obtain information from these state agencies:

- New York Department of State Division of Consumer Protection, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>
- New York State Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

North Carolina: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov

Rhode Island: Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: *Rhode Island Attorney General's Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov

West Virginia: You have the right to ask that nationwide consumer reporting agencies place “fraud alerts” in your file to let potential creditors and others know that you may be a victim of identity theft, as described above. You also have a right to place a security freeze on your credit report, as described above.

A Summary of Your Rights Under the Fair Credit Reporting Act: The federal Fair Credit Reporting Act

(FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information.
- Consumer reporting agencies may not report outdated negative information.
- Access to your file is limited.
- You must give your consent for reports to be provided to employers.
- You may limit “prescreened” offers of credit and insurance you get based on information in your credit report.
- You have a right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.

Transform SR Holding Management LLC Identifies and Addresses Data Security Incident

HOFFMAN ESTATES, ILLINOIS July 26, 2021 -- Today, Transform SR Holding Management LLC, a subsidiary of Transform Holdco LLC (with all subsidiaries of Transform Holdco LLC referred to collectively as “Transformco”) announced that it recently identified and addressed a data security incident in which an unauthorized party accessed certain systems within its computer network. Upon discovering this incident, Transformco immediately secured its systems and launched an investigation. On June 24, 2021, Transformco determined that the unauthorized access occurred between June 3, 2021 and June 15, 2021.

To help prevent a similar incident from occurring in the future, Transformco is implementing additional security measures to enhance the security of its network and continuing to provide training to its employees concerning phishing threats.

Transformco determined that the systems accessed by the unauthorized party may have contained Social Security numbers, financial account numbers, and/or healthcare insurance information about current and former Transformco employees. Transformco encourages its current and former employees to remain vigilant by reviewing their financial account statements for any unauthorized activity. As a precaution, Transformco is offering a complimentary membership to Kroll’s identity monitoring services to current and former employees who believe that they may have been affected by this incident. Kroll’s identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

For more information about this incident, including instructions on how to activate your complimentary membership to Kroll’s identity monitoring services, please call Transformco’s dedicated call center at 855-545-1937 Monday through Friday from 8:00 am to 5:30 pm Central Time.

NOTICE OF DATA SECURITY INCIDENT

California Residents Please Click Here [\[Link to California Resident Website Notice\]](#)

Transform SR Holding Management LLC, a subsidiary of Transform Holdco LLC (with all subsidiaries of Transform Holdco LLC referred to collectively as “Transformco”), understands the importance of protecting the privacy and security of the information we maintain. We are writing to inform you of a data security incident that may have involved some of your information. This notice explains the incident, measures we have taken, and some steps you can take in response.

WHAT HAPPENED?

We recently identified suspicious activity in our network. In response, we immediately secured the systems involved and commenced an investigation. The investigation determined that an unauthorized party accessed some of our computer servers between June 3, 2021 and June 15, 2021.

WHAT INFORMATION WAS INVOLVED?

On June 24, 2021, we determined that certain files on Transformco’s computer network may have been accessed by the unauthorized party. Certain of the files contained Social Security numbers, financial account numbers, and/or healthcare insurance information about current and former Transformco employees.

WHAT YOU CAN DO.

We encourage you to remain vigilant by regularly reviewing your credit reports, financial account statements, and statements you receive from healthcare providers for any unauthorized activity. If you see charges or activity you did not authorize, please contact the relevant provider immediately. We are also providing a complimentary membership to Kroll’s identity monitoring services to current and former employees who believe that they may have been affected by this incident. Kroll’s identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration. For more information on identity theft prevention and Kroll Identity Monitoring, including instructions on how to activate your complimentary membership, please call our dedicated call center for this incident at 855-545-1937.

WHAT WE ARE DOING.

To help prevent a similar incident from occurring in the future, we are implementing additional security measures to enhance the security of our network and continuing to provide training to our employees concerning phishing threats.

FOR MORE INFORMATION

If you have any questions, please call our dedicated call center at 855-545-1937 Monday through Friday from 8:00 am to 5:30 pm Central Time.

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity over the next 12 to 24 months. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

Fraud Alerts and Credit or Security Freezes

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

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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 bureau will provide you with 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.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

You can contact Transformco via U.S. mail at 3333 Beverly Road, Hoffman Estates, IL 60179 or via telephone at (847) 286-2500.

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Maryland: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us

Massachusetts: Under Massachusetts law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: *Office of the Massachusetts Attorney General*, One Ashburton Place, Boston, MA 02108, 1-617-727-8400, www.mass.gov/ago/contact-us.html

New York: You may contact and obtain information from these state agencies:

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North Carolina: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov

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A Summary of Your Rights Under the Fair Credit Reporting Act: The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
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- Access to your file is limited.
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- You may limit “prescreened” offers of credit and insurance you get based on information in your credit report.
- You have a right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization.
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NOTICE OF DATA BREACH

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WHAT YOU CAN DO.

We encourage you to remain vigilant by regularly reviewing your credit reports, financial account statements, and statements you receive from healthcare providers for any unauthorized activity. If you see charges or activity you did not authorize, please contact the relevant provider immediately. We are also providing a complimentary membership to Kroll’s identity monitoring services to current and former employees who believe that they may have been affected by this incident. Kroll’s identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration. For more information on identity theft prevention and Kroll Identity Monitoring, including instructions on how to activate your complimentary membership, please call our dedicated call center for this incident at 855-545-1937.

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FOR MORE INFORMATION

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