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October 9, 2023

VIA E-MAIL (ATTORNEYGENERAL@DOJ.NH.GOV)

The Honorable John Formella
Attorney General of the State of New Hampshire
Office of the Attorney General
33 Capitol Street
Concord, New Hampshire 03301

Re: *Notification of Data Security Incident*

Dear Attorney General Formella:

We represent Valmarc Corporation n/k/a Vi3 (“Vi3”), 163 Highland Avenue, Suite 1153, Needham, MA 02494, in connection with an incident that may have involved the personal information of two (2) New Hampshire residents. Vi3 is reporting the incident pursuant to N.H. REV. STAT. ANN. § 359-C:20. This notice will be supplemented, if necessary, with any new significant facts discovered subsequent to this submission. While Vi3 is notifying you of this incident, Vi3 does not waive any rights or defenses relating to the incident, this notice, or the applicability of New Hampshire law on personal jurisdiction.

NATURE OF THE INCIDENT

On May 19, 2023, Vi3 became aware of suspicious activity involving email accounts belonging to Vi3 employees. Upon discovering the activity, Vi3 began an investigation and secured the email account on May 24, 2023. Vi3 reviewed its multifactor authentication (“MFA”) policy, reviewed all accounts for potentially unauthorized log ins, and reset all passwords out of an abundance of caution. Polsinelli PC, counsel for Vi3, engaged a forensic security firm to investigate and confirm the security of Vi3’s email systems. The investigation confirmed one (1) Vi3 email account was accessed by an unauthorized third party beginning on May 17, 2023. Polsinelli PC engaged an e-discovery firm to search the contents of the email account for any personal information that could have been viewed. On September 11, 2023, Vi3 learned there was personal information in the account, and that the personal information varied by individual, but could have included

NOTICE TO THE RESIDENTS

Vi3 is notifying the two (2) New Hampshire residents of the incident by letter today, October 09, 2023. The notification letter includes an offer for _____ of complimentary credit monitoring and identity theft protection. Enclosed is a copy of the letter being sent to the New Hampshire residents via first-class United States mail.

STEPS TAKEN RELATING TO THE INCIDENT

Upon learning of the incident, Vi3 secured the email accounts, proactively changed password on all accounts, and worked with a forensic firm to assist in its investigation and confirm the security of its email systems. Vi3 is notifying the potentially involved individuals today. In the notification letters, Vi3 provided additional steps individuals could take to protect themselves against fraudulent activity and identity theft. For individuals whose Social Security number was involved, the notification letter includes an offer of complimentary credit monitoring and identity theft protection through Experian. Finally, Vi3 is reviewing its technical safeguards.

CONTACT INFORMATION

Please contact me if you have any questions or if I can provide you with any further information concerning this matter.

Verv trulv vours

Bruce Radke

Enclosure

VALMARC CORPORATION

Secure Processing Center
P.O. Box 3826
Suwanee, GA 30024

<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<City>><<State>><<Zip>>

<<Date>>

Dear <<Name 1>>:

Valmarc Corporation (“Vi3”) respects the privacy of information entrusted to us, which is why we are writing to advise you of an incident that may have involved some of your personal information. **At this time, we have no reason to believe that your personal information has been misused for the purpose of committing fraud or identity theft.** Nonetheless, we want to make you aware of the incident and provide you with guidance on what you can do to protect yourself, should you feel it is appropriate to do so.

On May 24, 2023, we became aware of suspicious activity involving an email account belonging to a Vi3 employee. Upon learning of the situation, we promptly contained the incident by securing the account to prevent further access and began an initial internal investigation into the incident. We also hired a leading forensic security firm to further investigate the incident and confirm the security of our computer systems and network. Our forensic investigation confirmed that an unauthorized third party temporarily accessed one (1) Vi3 employee’s email account at various times beginning on May 17, 2023.

We do not believe that the unauthorized third party’s motivation was to access the personal information contained in the email account and we have no indication that any such information has been used for fraud or identity theft purposes. However, out of an abundance of caution, we searched the email account for any personal information. On September 11, 2023, we learned that some of your information was contained in the compromised email account. The type of information that could have been viewed varied for each individual, but could include your name, <<Consolidated data elements>>.

In addition to the actions described above, we are taking steps to reduce the risk of this type of incident occurring in the future, including reviewing our technical security measures. Again, although we are not aware of any instances of fraud or identity theft, we are offering a complimentary one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you, and enrolling in this program will not hurt your credit score. **For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.**

We value the trust you place in us and take our responsibility to safeguard your personal information seriously. We apologize for any inconvenience this incident might cause. For further information and assistance, please call 855-457-8163 from Monday – Friday, 9:00 am to 9:00 pm (Eastern Standard Time).

Sincerely,

Valmarc Corporation

To help protect your identity, we are offering a **complimentary** one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: <<Enrollment Deadline>> (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: <https://www.experianidworks.com/3bcredit>
3. PROVIDE the **Activation Code**: <<Activation Code>>

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877.288.8057. Be prepared to provide engagement number <<Engagement Number>> as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

Activate your membership today at <https://www.experianidworks.com/3bcredit>
or call 877.288.8057 to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877.288.8057.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Additional Important Information

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft. For more information and to contact the FTC, please visit www.ftc.gov/idtheft or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

Credit Reports: You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print a copy of the request form at <https://www.annualcreditreport.com/manualRequestForm.action>.

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is as follows:

Equifax
1-866-349-5191
www.equifax.com
P.O. Box 740241
Atlanta, GA 30374

Experian
1-888-397-3742
www.experian.com
P.O. Box 2002
Allen, TX 75013

TransUnion
1-800-888-4213
www.transunion.com
P.O. Box 2000
Chester, PA 19016

Fraud Alerts: You may want to consider placing a fraud alert on your credit report. A fraud alert is free and will stay on your credit report for one (1) year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at www.annualcreditreport.com.

Credit and Security Freezes: You may have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:

Equifax Security Freeze
1-888-298-0045
<https://www.equifax.com/personal/credit-report-services/credit-freeze/>
P.O. Box 105788
Atlanta, GA 30348

Experian Security Freeze
1-888-397-3742
<https://www.experian.com/freeze/center.html>
P.O. Box 9554
Allen, TX 75013

TransUnion Security Freeze
1-888-909-8872
<https://www.transunion.com/credit-freeze>
P.O. Box 160
Woodlyn, PA 19094