

CLARK HILL

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August 12, 2019

Via email to attorneygeneral@doj.nh.gov

Attorney General Gordon MacDonald
Office of the Attorney General
33 Capitol Street
Concord, NH 03302

Dear Attorney General McDonald:

We represent Wind River Environmental, LLC (“Wind River”) with respect to a data security incident involving the potential exposure of certain personally identifiable information described in more detail below. Wind River is a business headquartered in Marlborough, Massachusetts that inspects, services, repairs, and installs non-hazardous liquid waste systems. Wind River is committed to answering any questions you may have about the data security incident, its response, and steps taken to prevent a similar incident in the future.

1. Nature of security incident.

On June 28, 2019, Wind River determined that the personal information of a small percentage of its former and existing employees and customers may have been contained in a limited number of corporate email accounts that were accessed by an unauthorized individual. Wind River hired independent computer forensic experts to assist with its investigation. That investigation confirmed that the email accounts were compromised and contained personal information, including names, addresses, Social Security numbers, driver’s license numbers, and/or financial account information, depending on what information each individual provided to Wind River. The forensic investigators were unable to determine whether any emails or attachments containing personal information had been opened or viewed by the unauthorized individual, and out of an abundance of caution Wind River notified all impacted individuals.

2. Number of residents affected.

Eleven (11) New Hampshire residents may have been affected and were notified of the incident. A notification letter was sent to the potentially affected individuals on August 12, 2019 via regular mail (a copy of the form notification letter is enclosed).

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3. Steps taken or plan to take relating to the incident.

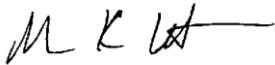
Wind River took immediate action to address this incident and prevent a similar incident in the future. Steps taken include changing passwords to all employee accounts and providing additional training to employees on recognizing and appropriately responding to suspicious e-mails and other security threats. The notification letter included details about the security incident as well as information about the Federal Trade Commission and the three major credit reporting agencies. The letter offered free credit monitoring and identity theft protection services through Kroll for one year.

4. Contact information.

Wind River takes the security of the information in its control seriously and is committed to ensuring its employees' and customers' information is protected. If you have any questions or need additional information, please do not hesitate to contact me at mventrone@clarkhill.com or (312) 360-2506.

Very truly yours,

CLARK HILL

A handwritten signature in black ink, appearing to read "M K Ventrone", with a horizontal line extending to the right.

Melissa K. Ventrone

Enclosure



<<Date>> (Format: Month Day, Year)

<<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

Notice of Security Incident

Dear <<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>,

We are writing to notify you of a data security incident experienced by Wind River Environmental, LLC ("Wind River") that may have impacted your personal information. We value and respect the privacy of your information, and sincerely apologize for any concern or inconvenience this may cause you. This letter contains information about steps you can take to protect your information, and resources we are making available to help you.

What happened:

On June 28, 2019, we determined that your personal information may have been contained in a limited number of corporate email accounts that were accessed by an unauthorized individual. As part of our investigation, we hired independent computer forensic experts to assist with our investigation. From this review, we determined that along with your name, other data such as your address, Social Security number, driver's license number, and/or financial account information, depending on what information you provided to us, may have been stored in the email accounts. Although we have no evidence that your information was viewed or misused, we wanted to let you know about this incident out of an abundance of caution.

What we are doing and what you can do:

The security and privacy of your information is important to us, that is why we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit krollbreach.idMonitoringService.com to activate and take advantage of your identity monitoring services.

*You have until **November 12, 2019** to activate your identity monitoring services.*

Membership Number: <<Member ID>>

Additional information describing your services is included with this letter. Please note that you must be at least eighteen years of age or older to activate the identity monitoring services. If you are not eighteen years of age or older, please call us at 1-866-775-4209 for consultation and restoration services.

We also want you to know that we took immediate action to address this incident to prevent a similar incident in the future. We changed passwords to all employee accounts and provided additional training to our employees on recognizing and appropriately responding to suspicious e-mails and other security threats. More information about steps you can take to protect your identity can be found below.

For More Information:

If you have any questions or concerns, please call 1-866-775-4209, Monday through Friday, 8:00 a.m. – 5:30 p.m. Central Time. Your trust is a top priority for Wind River, and we deeply regret any inconvenience or concern that this matter may cause you.

Sincerely,

Eric Scheinerman
Wind River Environmental, LLC

U.S. State Notification Requirements

For residents of Hawaii, Michigan, Missouri, New Mexico, Virginia, Vermont, and North Carolina: It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

For residents of Colorado, Illinois, Iowa, Maryland, Missouri, New Mexico, North Carolina, Oregon, Washington, and West Virginia:

It is required by state laws to inform you that you may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report by contacting any one or more of the following national consumer reporting agencies:

Equifax
P.O. Box 105139
Atlanta, GA 30374
1-800-685-1111
www.equifax.com

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

TransUnion
P.O. Box 6790
Fullerton, CA 92834
1-800-916-8800
www.transunion.com

You may also obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

For residents of Iowa:

State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon:

State laws advise you to report any suspected identity theft to law enforcement, as well as the Federal Trade Commission.

For residents of Colorado, Maryland, Illinois, North Carolina, and Rhode Island:

You can obtain information from the Maryland, North Carolina, and Rhode Island Offices of the Attorneys General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Maryland Attorney General
Consumer Protection Div.
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
www.oag.state.md.us

North Carolina Attorney General
Consumer Protection Div.
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-566-7226
www.ncdoj.com

Rhode Island Attorney General
Consumer Protection Div.
150 South Main Street
Providence, RI 02903
(401) 274-4400
www.riag.ri.gov

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

For residents of Massachusetts:

It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft.

For residents of all states:

Fraud Alerts: You can place fraud alerts with the three credit bureaus at one of the three major credit bureaus by phone and also via each credit bureau's website. 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. The contact information for all three credit bureaus is below. As of September 21, 2018, fraud alerts will now last one year, instead of 90 days. Fraud alerts will continue to be free and identity theft victims can still get extended fraud alerts for seven years.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

Security Freeze: 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, each credit reporting agency has a dedicated web page for security freezes and fraud alerts or you can request a freeze by phone or by mail. 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 may also require a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. Effective September 21, 2018, placing a freeze on your credit report is now free for all United States citizens.

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
www.equifax.com

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
<http://www.experian.com/freeze>

TransUnion (FVAD)
P.O. Box 2000
Chester, PA 19022
www.transunion.com

More information can also be obtained by contacting the Federal Trade Commission listed above.

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services¹ from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

¹ Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.