

CIPRIANI & WERNER

A PROFESSIONAL CORPORATION

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January 29, 2024

Via Email (DOJ-CPB@doj.nh.gov):

Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301

RE: Notice of Data Security Incident

To Whom It May Concern:

We serve as counsel for The 1911 Trust Company, LLC (“1911 Trust”) located at 400 Essex Street, Beverly Farms, MA 01915 and provide this notification of a recent data security incident. By providing this notice 1911 Trust does not waive any rights or defenses under New Hampshire law, including the data breach notification statute.

On November 30, 2023, 1911 Trust learned that its third-party vendor, Paycor, experienced a cybersecurity event related to the MOVEit zero-day vulnerability. 1911 Trust uses Paycor for HR and payroll related services. Paycor in turn, uses Progress Software Corporation’s MOVEit software. At the end of May, Progress Software Corporation identified a vulnerability in its software when it experienced a cybersecurity event. As a results, information related to 1911 Trust’s employees and dependents were impacted. 1911 Trust worked quickly to review the list of impacted individuals and provided notification to impacted individuals.

1911 Trust determined the data related to 1911 Trust employees includes employees name and Social Security number. 1911 Trust provided written notice of this incident on January 29, 2024 to 3 potentially impacted New Hampshire residents via First Class U.S. Mail.

The notice letters include instructions for potentially impacted individuals to access complimentary credit monitoring and identity protection services. Template copies of the individual notification letters sent to potentially impacted individuals in New Hampshire is attached hereto as *Exhibit A*.

Thank you for your attention to this matter. Please contact me should you have any questions

Very truly yours,

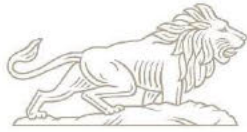
CIPRIANI & WERNER, P.C.

By

—

Hilary Higgins, Esq.

Exhibit A



1911 TRUST



January 29, 2024


Notice of Data Security Incident

Dear 

The 1911 Trust Company, LLC (“1911 Trust”) uses Paycor for its payroll and human resources information processing. Paycor recently notified 1911 Trust that a third-party vendor of Paycor experienced a data security event that may have impacted some of our employees’ personal information.

What Happened? Paycor notified 1911 Trust of a recent data security event experienced by its data transfer software provider, MOVEit. 1911 Trust learned from Paycor, that data related to 1911 Trust employees was potentially impacted by this incident on November 30, 2023.

What Information Was Involved? Paycor informed us that the potentially impacted data related to you may have included your

What We Are Doing? 1911 Trust takes the privacy of your information seriously and expects Paycor and its vendors to take proactive actions to prevent similar occurrences. 1911 Trust has also arranged for an offer of  of complimentary credit monitoring and identity protection services through IDX. Instructions on how to enroll in this service are below. Due to privacy laws, we cannot enroll you in these services and you will need to take the steps outlined below to complete enrollment.

What You Can Do. We encourage you to enroll in the complimentary credit monitoring and identity protection services we are making available to you. Information about how to enroll in these services along with additional resources available to you are included in the attached *Steps You Can Take to Help Protect Your Information*. The deadline to enroll in these services is

For More Information. We understand you may have questions about this incident. You may call 978-921-0452 between 8:30 AM - 4:30 PM or reach out to Michelle MacIntyre directly.

Sincerely,

The 1911 Trust Company, LLC

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit Monitoring / Identity Protection

1. Website and Enrollment. Go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.

2. 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. The deadline to enroll in these services is .

3. Telephone. Contact IDX at **1-800-939-4170** to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

Monitor Your Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your credit reports/account statements and explanation of benefits forms for suspicious activity and to detect errors. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus, TransUnion, Experian, and Equifax. To order your free credit report, visit www.annualcreditreport.com or call 1-877-322-8228. Once you receive your credit report, review it for discrepancies and identify any accounts you did not open or inquiries from creditors that you did not authorize. If you have questions or notice incorrect information, contact the credit reporting bureau.

You have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a one-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any of the three credit reporting bureaus listed below.

As an alternative to a fraud alert, you have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without your express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a credit freeze may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a credit freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., III, etc.);
2. Social Security number;
3. Date of birth;
4. Address for the prior two to five years;
5. Proof of current address, such as a current utility or telephone bill;
6. A legible photocopy of a government-issued identification card (e.g., state driver’s license or identification card); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency

concerning identity theft, if you are a victim of identity theft.

Should you wish to place a fraud alert or credit freeze, please contact the three major credit reporting bureaus listed below:

TransUnion
1-800-680-7289
www.transunion.com

Experian
1-888-397-3742
www.experian.com

Equifax
1-888-298-0045
www.equifax.com

TransUnion Fraud Alert
P.O. Box 2000
Chester, PA 19016-2000

Experian Fraud Alert
P.O. Box 9554
Allen, TX 75013

Equifax Fraud Alert
P.O. Box 105069
Atlanta, GA 30348-5069

TransUnion Credit Freeze
P.O. Box 160
Woodlyn, PA 19094

Experian Credit Freeze
P.O. Box 9554
Allen, TX 75013

Equifax Credit Freeze
P.O. Box 105788
Atlanta, GA 30348-5788

Additional Information

You can further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the credit reporting bureaus, the Federal Trade Commission (FTC), or your state Attorney General. The FTC also encourages those who discover that their information has been misused to file a complaint with them. The FTC may be reached at 600 Pennsylvania Ave. NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261.

You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement, your state Attorney General, and the FTC. This notice has not been delayed by law enforcement.

For Massachusetts residents, 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

For New York residents, the New York Attorney General may be contacted at Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov>.