



April 13, 2018

Consumer Protection and Antitrust Bureau  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301  
Phone: (603) 271-3643  
Fax: (603) 271-2110

Via email: [DOJ-CPB@doj.nh.gov](mailto:DOJ-CPB@doj.nh.gov)

Dear Sir or Madam:

ABC Phones of North Carolina, Inc dba Victra (the “Company”), an authorized retailer of Verizon Wireless and provides cellular telephones, plans and accessories to its customers, headquartered in Raleigh, North Carolina, writes to notify you of a data breach incident that involves the personal and financial information of three (3) New Hampshire residents (the “Residents”).

**What Happened:**

In February, 2018, Victra identified anomalies in its Office 365 portal that gave it concerns there was potential unauthorized access to its systems. Victra then engaged both outside counsel and an experienced cybersecurity vendor to conduct a forensic audit and investigate the possibility of a security breach. After a detailed investigation, it was determined on March 13, 2018, that Victra had been the victim of a phishing scam and that two HR related employees’ sharepoint environments may have been compromised. Those environments included access to certain confidential HR and employment records. While there is no evidence directly indicating the sensitive data was actually acquired or removed, we cannot conclude that it was not. Since that date, we have identified the potentially impacted employees and their contact information.

**What Information Was Involved:**

Because of the nature of the breach, the Company believes that the Residents’ personal information, which may include name, social security number, address, and date of birth (the “PII”) may have been compromised.

**What Company is Doing in Response to this Incident:**



The Company is informing the Residents of the potential breach of their PII. In addition, the Company will be offering the Residents a year-long credit monitoring program to protect their PII. I have attached a copy of the notification that will be sent to the Residents on April 17, 2018 for your review. If you have any questions or concerns regarding this incident please feel to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Ross Ullman", is written over the word "Sincerely,".

Ross Ullman, Counsel  
Victra

8510 Colonnade Center Drive, Suite 300  
Raleigh, North Carolina, 27615  
440-479-0309

# **NOTICE OF DATA BREACH**

[DATE], 2018

Dear «**First\_Name**» «**Last\_Name**»:

We are writing to inform you about a data security incident impacting employees or applicants of ABC Phones of North Carolina, Inc. dba Victra headquartered at 8510 Colonnade Center Drive, Suite 300, Raleigh, North Carolina 27615 (the “Company”) that involves your personal information. We take the protection of your information very seriously. That is why we are contacting you directly and will work you to minimize any effect from this incident.

## **What Happened:**

In February, 2018, Victra identified anomalies in its Office 365 portal that gave it concerns there was potential unauthorized access to its systems that may have begun as early as late January, 2018. Victra then engaged both outside counsel and an experienced cybersecurity vendor to conduct a forensic audit and investigate the possibility of a security breach. After a detailed investigation, it was determined on March 13, 2018, that Victra had been the victim of a phishing scam and that two HR related employees’ sharepoint environments may have been compromised. Those environments included access to certain confidential HR and employment records. While there is no evidence directly indicating the sensitive data was actually acquired or removed, we cannot conclude that it was not.

## **What Information Was Involved:**

Because of the nature of the breach, Victra believes that your personal information including the following may have been compromised: name, address, phone number, social security number, birth certificate, driver’s license and other forms of government identifications, as well as earnings and financial information.

## **What is the Company. Doing in Response to this Incident:**

The Company is notifying all affected employees and taking steps to increase its defenses against future intrusions, including increasing our encryption processes, updating our policies and procedures of intercompany handling of personal information, increasing our IT security awareness trainings, implementing stronger group policies to prevent software being installed on our computers, and locking certain hard drives from being able to save data. These steps have been or are in the process of being implemented as of the date of this letter. The Company is also offering you twelve months of free credit monitoring via Experian’s Credit Plus service. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: [enrollment end date]** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: [URL]
- Provide your **activation code: [code]**

**What Should You Do:**

While the Company is not aware of any misuse of your information we recommend that you do the following right away:

1. Contact your financial institution and change your account information
2. Change your passwords
3. Remain vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity.

In addition to Experian credit monitoring services, 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](http://www.annualcreditreport.com) or call toll free at 1-877-322-8228. You have rights under the Fair Credit Reporting and Identity Security Act in the event any information contained in your reports is inaccurate. You can also place a credit freeze on your credit file with the three nationwide credit reporting companies. Contact information for the three nationwide credit reporting companies is as follows:

Equifax: PO Box 740241, Atlanta, GA 30374, [www.equifax.com](http://www.equifax.com), 1-800-685-1111  
Experian: PO Box 2002, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742  
TransUnion: PO Box 2000, Chester, PA 19016, [www.transunion.com](http://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. You have the right to obtain 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](http://www.ftc.gov/idtheft)

**For More Information:**

See enclosed addendum for additional, state specific information. If you have any questions or concerns regarding this incident or the Company's response please contact Ross Ullman, Counsel for Victra at [Ross.Ullman@Victra.com](mailto:Ross.Ullman@Victra.com) or 440-479-0309.

Sincerely,

[SIGNATORY]

## **STATE SPECIFIC PROVISIONS**

### **For Maryland Residents**

You may also contact the Maryland Attorney General to report incidents of identity theft or learn more about protecting yourself from identity theft.

200 St. Paul Place  
16th Floor  
Baltimore, MD 21202  
Telephone: 1-888-743-0023  
idtheft@oag.state.md.us  
<http://www.marylandattorneygeneral.gov/>

### **For North Carolina Residents**

You may also contact the North Carolina Attorney General to report incidents of identity theft or learn more about protecting yourself from identity theft.

9001 Mail Service Center  
Raleigh, NC 27699-9001  
Telephone: (919) 716-6400  
<http://www.ncdoj.gov/Protect-Yourself/2-4-3-Protect-Your-Identity.aspx>

### **For Iowa Residents**

You may also contact the Iowa Attorney General to report incidents of identity theft or learn more about protecting yourself from identity theft.

Crime Victim Assistance Division  
Office of the Attorney General of Iowa  
Hoover State Office Building  
1305 E. Walnut Street  
Des Moines IA 50319  
Phone: 515-281-5044  
Toll-free: 800-373-5044  
<https://www.iowaattorneygeneral.gov/contact-us>