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April 28, 2012

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direct fax 770 234 6341
JNeiditz@kilpatricktownsend.com

Office of the Attorney General
Attn: Consumer Protection and Antitrust Bureau
33 Capitol Street
Concord, NH 03301

via email to: doj-cpb@doj.nh.gov

Re: Security Incident Notification

To Whom It May Concern:

This letter serves to notify the Office of the Attorney General of a data security incident that appears to involve personal information pertaining to one New Hampshire resident.

How the incident occurred and was discovered:

On March 16, 2021, Acclaris, which administers retirement programs, learned that the personal information of a resident of another state was used in an attempt to defraud her former employer of a small reimbursement. Through careful research, we discovered on March 24, 2021 that information pertaining to a single New Hampshire resident was also used in this manner. The exact dates of the breach are unknown, but the incident appears to have concluded on September 14, 2020. The personal information involved was the individual's name, social security number, date of birth and zip code.

We conducted a thorough investigation of this incident, identified a suspect and are coordinating with law enforcement's investigation. We enhanced our procedures designed to prevent this from happening again, and have corrected all records and otherwise made sure that this incident will not impact the New Hampshire resident's ability to utilize benefit programs in any way.

We have arranged to offer the individual free identity theft protection services through IDX, a data breach and recovery services expert, to provide IDX identity protection services to the individual. IDX identity protection services include: 24 months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed ID theft recovery services.

Sample notice and credit monitoring details

A sample of the notification that is being mailed out this week to the affected individual is enclosed, together with further details about the free credit monitoring service offered to the individual.

Office of the Attorney General
April 28, 2021
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Please do not hesitate to reach out to me at the contact details above with any questions about this incident. In addition, you may contact Fernando M. Pinguelo, Esq., internal counsel for Acclaris, at 212-309-3523.

Sincerely,

Jon Neiditz

Jon Neiditz



Acclaris

A Willis Towers Watson Company

Retiree Plan Administration
Acclaris
1511 N Westshore Blvd., Suite 350
Tampa, FL 33607

April 28, 2021

«Name_Proper»
«Address_1_Proper» «Address_2_Proper»
«City_Proper», «STATE» «ZIP»
«Control_Number»

Notice of Security Incident

Dear «Name_Proper»:

We regret to inform you about a recent data breach at Acclaris connected to certain [Customer Name] retiree programs that we administer.

Unfortunately, your personal information—specifically your name, social security number, date of birth and zip code—was involved.

After extensive research, we have determined:

- Your retiree benefits are not impacted.
- The misuse of personal information was limited.
- The issue has been rectified.

Still, we know how difficult it is to deal with issues with personal information—and that any risk of this nature is unacceptable. So, as an added precaution, we are offering you the chance to enroll in two years of complimentary identity theft protection services. We encourage you to do so, and to take the steps outlined on the following pages.

We take this matter very seriously and sincerely regret any difficulties it causes you. Your personal information is very important and we remain committed to safeguarding it.

One of our dedicated team of customer service representatives will be reaching out by phone in the coming days to answer any questions you may have. If you (or someone you designate) would prefer to call directly, the team can be reached at 1-866-562-2696, Monday to Friday between 8am and 5pm, ET.

Sincerely,

David Speier

About Acclaris

Acclaris has been administering [Customer Name] retiree programs since 2007. Acclaris is a sister company to Via Benefits, and a subsidiary of Willis Towers Watson, a global human resources consulting

IDX Identity Protection

Enrollment Code is:

«IDX_Code»

Enroll by September 30 at
<https://app.idx.us/account-creation/protect>

or

1-800-939-4170 (Monday –
Friday, 8am – 8pm, ET)



A Willis Towers Watson Company

Managing Director, Acclaris

Fact Sheet

Who is Acclaris & Why Do You Have My Information? Acclaris is an employee benefits administration firm, closely connected to Via Benefits. Both are subsidiaries of Willis Towers Watson, one of the largest human resource consulting firms with employees across the globe. Acclaris helps to administer certain [Customer Name] programs for [Customer Name] retirees.

What Happened? In March 2021, Acclaris learned that the personal information of a participant in an [Customer Name] retiree program was used in an attempt to defraud an [Customer Name] retiree program. Through carefully researching all [Customer Name] retiree programs we administer, we discovered that the information of a small number of additional participants also had been used. Unfortunately, we have discovered that some of your information was impacted. We have taken steps to prevent this from happening again, and this incident will not impact your ability to utilize any of the [Customer Name] retiree programs in any way.

What Information Was Involved? The personal information was your name, social security number, date of birth and zip code.

What Is Acclaris Doing? We have conducted a thorough investigation of this incident and are coordinating with law enforcement. We enhanced our procedures to prevent this from happening again and have made sure that this incident will not impact your ability to utilize any of the [Customer Name] retiree programs in any way.

As an added precaution, we have arranged to offer, at no cost to you, identity theft protection services through IDX, a data breach and recovery services expert, to provide you with IDX identity protection services. IDX identity protection services include: 24 months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed ID theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

We encourage you to enroll in free IDX identity protection services by going to <https://app.idx.us/account-creation/protect> or calling 1-800-939-4170. You'll need your Enrollment Code, which can be found on the accompanying letter. IDX representatives are available Monday through Friday, between 8am and 8pm, Eastern Time. Please note the deadline to enroll is September 30, 2021.

You will find detailed instructions for enrollment in the enclosed *Recommended Steps to Help Protect Your Information* document. Also, you will need to reference your enrollment code when enrolling, so please do not discard this letter.

What You Can Do.

We encourage you to remain vigilant by monitoring your accounts and reviewing the enclosed *Steps You Can Take to Help Protect Your Personal Information* for additional

guidance on how to protect your personal information, and to consider enrolling in the credit monitoring and identity restoration services offered there.



Recommended Steps to Help Protect Your Information

- 1. Enrollment.** Call 1-800-939-4170 or go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment. You will need your personal Enrollment Code, which can be found in the accompanying 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 make full use of this portion of the service. If you need assistance, IDX will be able to assist you.
- 3. Review your credit reports.** We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

You should also know that you have the right to file a police report if you ever experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

- 4. Place Fraud Alerts** with the three credit bureaus. If you choose to place a fraud alert, we recommend you do this after activating your credit monitoring. You can place a fraud alert at one of the three major credit bureaus by phone and also via Experian's or Equifax'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 bureaus is as follows:

Credit Bureaus

Equifax Fraud Reporting 1-866-349-5191 P.O. Box 105069 Atlanta, GA 30348-5069 www.equifax.com	Experian Fraud Reporting 1-888-397-3742 P.O. Box 9554 Allen, TX 75013 www.experian.com	TransUnion Fraud Reporting 1-800-680-7289 P.O. Box 2000 Chester, PA 19022-2000 www.transunion.com
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It is necessary to contact only ONE of these bureaus and use only ONE of these methods. As soon as one of the three bureaus confirms your fraud alert, the others are notified to place alerts on their records as well. You will receive confirmation letters in the mail and will then be able to order all three credit reports, free of charge, for your review. An initial fraud alert will last for one year.

Please Note: No one is allowed to place a fraud alert on your credit report except you.

5. Security Freeze. By placing a security freeze, someone who fraudulently acquires your personal identifying information will not be able to use that information to open new accounts or borrow money in your name. You will need to contact the three national credit reporting bureaus listed above to place the freeze. Keep in mind that when you place the freeze, you will not be able to borrow money, obtain instant credit, or get a new credit card until you temporarily lift or permanently remove the freeze. There is no cost to freeze or unfreeze your credit files.

6. You can obtain additional information about the steps you can take to avoid identity theft from the following agencies. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them.

California Residents: Visit the California Office of Privacy Protection (www.oag.ca.gov/privacy) for additional information on protection against identity theft.

Kentucky Residents: Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov, Telephone: 1-502-696-5300.

Maryland Residents: Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023.

New Mexico Residents: You have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to

know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the 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 credit reports to be provided to employers; you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; and you may seek damages from a violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. You can review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

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

North Carolina Residents: Office of the Attorney General of North Carolina, 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 1-919-716-6400.

Oregon Residents: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392

Rhode Island Residents: Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, Telephone: 401-274-4400

All US Residents: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, www.consumer.gov/idtheft, 1-877-IDTHEFT (438-4338), TTY: 1-866-653-4261.