



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

19109 West Catawba Avenue, Suite 200
Cornelius, NC 28031

October 25, 2023

VIA E-MAIL

Office of the New Hampshire Attorney General
Consumer Protection & Antitrust Bureau
33 Capitol Street
Concord, NH 03301
E-mail: DOJ-CPB@doj.nh.gov

Re: Notice of Data Event

To Whom It May Concern:

We represent Andesa Services, Inc. (“Andesa Services”) located at 6575 Snowdrift Road #108, Allentown, PA and are providing this notice on behalf of its data owners for which Andesa Services provides administrative services for employer-owned, bank owned, or sponsored insurance policies. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Andesa Services does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

On May 31, 2023 and again in June 2023, Progress Software Corp. publicly disclosed zero-day vulnerabilities that impacted the MOVEit Transfer tool. As a user of that tool, Andesa Services moved quickly to apply available patching and undertook recommended mitigation steps and promptly launched an investigation. On June 16, 2023, Andesa Services engaged Mullen Coughlin, LLC (“Mullen Coughlin”) to direct a privileged investigation and response for this Event. The investigation assisted in determining whether the Event triggered any notice obligations under applicable law and contract. On the same day, Mullen Coughlin engaged Charles River Associates (“CRA”) on Andesa Services’ behalf to conduct a privileged investigation for the purposes of determining the potential impact of the vulnerabilities’ presence on the MOVEit Transfer server on the security of data housed on the server and providing legal advice. CRA immediately began working with the Mullen Coughlin and Andesa Services teams to collect forensic artifacts for analysis. On June 23, 2023, the investigation determined that an unknown

actor exploited vulnerabilities, accessed the MOVEit Transfer server between May 30, 2023 and May 31, 2023, and exfiltrated certain data from the MOVEit Transfer server during that time.

Andesa Services and CRA launched a time-consuming and detailed review of the data stored on the server at the time of access to understand the contents of that data and to whom that data relates.

On August 2, 2023, the review was completed. Upon receipt of the results of the review, Andesa Services and CRA conducted an additional review of its files to further confirm the impacted data and for contact information to notify potentially impacted individuals about the Event. The information that could have been subject to unauthorized access includes

Notice to New Hampshire Residents

On or about October 23 2023, Andesa Services provided written notice of this incident to approximately fourteen (14) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*. As Andesa Services does not own the data at issue, it provided notice to appropriate data owners who requested that Andesa Services provide notice to your office on their behalf. Andesa Services may supplement this notice to report additional residents have been notified on behalf of other data owners.

Other Steps Taken and To Be Taken

Upon discovering the event, Andesa Services moved quickly to investigate and respond to the incident, assess the security of Andesa Services systems, and identify potentially affected individuals. Further, Andesa Services notified federal law enforcement regarding the event. Andesa Services is also working to implement additional safeguards and training to its employees. Andesa Services is providing access to credit monitoring services for _____, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Andesa Services is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Andesa Services is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Andesa Services is providing written notice of this incident to relevant state and federal regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Office of the New Hampshire Attorney General

October 25, 2023

Page 3

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at .

Very truly yours,

Matthew V. Toldero of
MULLEN COUGHLIN LLC

MVT/kld
Enclosure

EXHIBIT A



130 1 27326 *****SNGLP
SAMPLE A. SAMPLE - L01
APT ABC
123 ANY ST
ANYTOWN, US 12345-6789



October 23, 2023

Notice of Data [Extra1]

Dear Sample A. Sample:

Andesa Services (“Andesa”) performs administrative services for employer-owned or sponsored insurance policies. We are writing to inform you of an event that may affect the security of your personal information. This letter provides details of the event, our response, and resources available to you to help protect your personal information from possible misuse, should you feel it is appropriate to do so.

What Happened. On May 31, 2023, Progress Software Corp. publicly disclosed a previously unknown vulnerability that impacted its MOVEit Transfer tool. As a user of that tool, we quickly applied available patching and recommended mitigation steps. In addition, we promptly launched an investigation, with the assistance of third-party cybersecurity specialists, to determine the potential impact of the vulnerability’s presence on the MOVEit Transfer server on the security of data housed on the server. Our investigation included a detailed review of the data stored on the server at the time of the unauthorized access. We have determined that an unknown actor exploited the vulnerability, accessed the MOVEit Transfer server between May 30, 2023 and May 31, 2023, and obtained access to certain data from the MOVEit Transfer server during that time.

What Information Was Involved. We determined that the unauthorized access into the MOVEit Transfer server rendered accessible your [Extra2]. Although we are currently unaware of any actual or attempted misuse of your personal information, we are providing you with this notice out of an abundance of caution.

What We Are Doing. We take this event and the security of your personal information very seriously. As noted above, upon learning of this event, we quickly applied available patching and recommended mitigation steps. In addition, we promptly embarked on an investigation of this matter with the assistance of third-party cybersecurity specialists.. As part of our ongoing commitment to you and the security of information, we are notifying you of this event, reviewing and enhancing our existing policies and procedures related to data security to reduce the likelihood of a similar future event.

As a precaution, we are providing you with access to [Extra3] months of credit monitoring and identity protection services provided by Experian. A description of services and instructions on how to enroll can be found within the enclosed *Steps You Can Take to Help Protect Your Information*. Please note that you must complete the enrollment process yourself, as we are not permitted to enroll you in these services on your behalf.

What You Can Do. Please review the enclosed *Steps You Can Take to Help Protect Your Information*, which contains information on what you can do to better protect against possible misuse of your information. We encourage you to remain vigilant against potential incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. You will also find information on how to enroll in the credit monitoring services offered.

For More Information. We understand that you may have questions that are not addressed in this letter. If you have additional questions, please call 1-800-626-3075, which is available Monday through Friday, between the hours of 8:00 a.m. and 10:00 p.m.

Central Time, or Saturday and Sunday from 10:00 a.m. and 7:00 p.m. Central Time (excluding major U.S. holidays). Be prepared to provide engagement number [Engagement Number]. Also, you can write to us at Andesa Services, 6575 Snowdrift Road #108, Allentown, PA 18106.

Sincerely,

Andesa Services

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for [Extra3] months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for [Extra3] months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary [Extra3]-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at [Phone Number]. Be prepared to provide engagement number [Engagement Number] as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR [Extra3]-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **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 file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related 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.

* 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.

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers 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 display on a consumer’s credit file, 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, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers 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 the consumer’s 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 to take control over who gets access to the personal and financial information in your credit report 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., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, etc.); 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 a credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-800-916-8800
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. 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 and your state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

For 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 bureaus 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 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. We encourage you to 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.

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/>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 406 Rhode Island residents impacted by this incident.