

Fisher Broyles

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January 25, 2021

Via email to attorneygeneral@doj.nh.gov

Attorney General Gordon MacDonald

Office of the Attorney General

33 Capitol Street

Concord, NH 03301

Re: Notification of data breach incident

Dear Attorney General MacDonald:

The undersigned represents BBC Industries, Inc. (“BBC”) in connection with the above-referenced matter. Please accept the following from BBC as formal notice of a data breach incident. BBC is a Missouri company with a principal place of business located at 5 Capper Drive, Pacific, Missouri 63069. BBC is a manufacturer of infrared heaters, infrared heater components, equipment, and systems, in addition to fabricating emitters, element panels, and controls as an international OEM supplier. As part of these services, BBC at times receives certain personal information. This matter concerns the security of personal information relating to certain affected individuals, of which one (1) is a New Hampshire resident.

Nature of the Data Event

On or about August 18, 2020, an unauthorized third person gained access to one (1) email account at BBC. On September 24, 2020, BBC first became aware of suspicious activity related to the email account. Upon discovery, BBC took immediate action to shut down the unauthorized access by executing a systemwide email password reset and by implementing Multi Factor Authentication. BBC then engaged the undersigned, who retained third-party IT forensic experts to conduct a detailed systemwide review, including reviewing other mailboxes for unauthorized rules or access and mailbox audit and browser logs. Based on the review, it was determined that the incident was remediated with that the unauthorized access had ceased as of September 15, 2020, and that there was no indication of additional compromise to the email system.

BBC then engaged third-party experts to conduct a full review of the information stored in the email account that was accessed to assess the contents and to determine if the mailbox contained any personally identifiable information (PII) or other sensitive data. Although it could

not be determined whether the unauthorized actor removed any information from the email account, BBC then retained Kroll to provide notice to the identified and potentially affected individuals, including offering two years of complimentary identity theft protection and credit monitoring services. BBC also has set up, through Kroll, a dedicated number for potentially affected individuals to call with questions related to the incident.

Notice to New Hampshire Residents

BBC provided written notice to potentially affected individuals, including the one New Hampshire resident, by mail on January 19, 2021. Written notice is being provided in substantially the same form as the letter attached hereto as Exhibit "A".

Remedial Actions

BBC takes the privacy and security of all sensitive data very seriously and has used/is using the incident as an opportunity to continue to improve the security of BBC's email system. BBC has not seen any further unauthorized or malicious activity since the time of the incident, and has put additional safety measures into place to help better protect BBC data moving forward, including forcing a global password reset and implementing Multi Factor Authentication for users. BBC also had third-party experts review its system for any additional unauthorized rules or evidence of access.

Thank you for your kind and early attention to this matter. Please feel free to contact the undersigned should there be any questions about this notification or any other aspect of this data security event.

Yours very truly,

FISHERBROYLES, LLP



Stuart A. Panensky, Esq.

cc: Ronald Vinyard
President, BBC Industries, Inc.

EXHIBIT A [Notification Letter]



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

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country >>

Re: Notice of Data Breach

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

I am writing to inform you about a recent IT incident at BBC Industries, Inc. that may affect the security of your personal information. We take this incident and all information security issues very seriously and as such, we are providing you with information and access to resources so that should you feel it is appropriate to do so, you can help protect your personal information. In the course of its business operations, BBC Industries, Inc. at times receives certain personal information. You are receiving this notice because some of your personal information was exposed as a result of unauthorized access to an email account.

What Happened? On or about August 18, 2020, an unauthorized third person gained access to one email account at BBC Industries, Inc. Upon discovery, we took immediate action to shut down the unauthorized access and remediate the issue. We then brought in IT security and forensics experts to conduct a detailed systemwide review, which included an extensive inspection of information stored in the email account that was accessed. Although it cannot be determined whether the unauthorized person removed any information from the email account, we are providing this notice to you out of an abundance of caution so that you may take further steps if you choose to do so.

What Information Was Involved? The data that was subject to unauthorized access varied in individual cases, however, in your case it contained <<b2b_text_1(LossTypes)>>. To date, we have received no indication that anyone's sensitive information has been misused as a result of this incident whatsoever.

What Are We Doing? We take the security of sensitive information that we receive very seriously. Immediate actions were taken to secure our email system and ensure that any further suspicious activity was prevented. This included a systemwide email password reset and implementation of other security measures. Further, we engaged independent third-party IT forensic experts to conduct an exhaustive investigation of this matter, including a review of the contents of the compromised email box. The forensics experts determined that the incident was remediated and that there was no indication of additional compromise to our email system. In addition to providing notice to you, BBC Industries, Inc. is also providing notice to state regulators as required.

We also want to make sure you have the information you need so that you can take steps to help protect yourself from the potential of identity theft. We encourage you to remain vigilant and to regularly review and monitor relevant account statements and credit reports and report suspected incidents of identity theft to local law enforcement, your state's Attorney General, or the Federal Trade Commission (the "FTC"). We have included more information on these steps in this letter.

In addition, to help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring **at no cost to you for two years**. 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 <https://enroll.idheadquarters.com> to activate and take advantage of your identity monitoring services.

You have until **April 8, 2021** to activate your identity monitoring services.

Membership Number: <<Member ID>>

Additional information describing your services is included with this letter.

What you can do? Please review the enclosed "Additional Resources" section included with this letter (see below). This section describes additional steps you can take to help protect yourself, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file.

For more information.

If you have questions, please call 1-877-514-0832, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time. Please have your membership number ready.

On behalf of BBC Industries, Inc., we are genuinely sorry this incident occurred and apologize for the inconvenience this matter may cause you. Safeguarding your information is important to us. We trust that the services we are offering to you demonstrate our continued commitment to your security and satisfaction.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Vinyard". The signature is written in a cursive, flowing style with a prominent loop at the end.

Ronald Vinyard, President

ADDITIONAL RESOURCES

Contact information for the three nationwide credit reporting agencies:

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111

Experian, PO Box 2104, Allen, TX 75013, www.experian.com, 1-888-397-3742

TransUnion, PO Box 2000, Chester, PA 119016, www.transunion.com, 1-800-888-4213

Free Credit Report. It is recommended that you remain vigilant by reviewing account statements and monitoring your credit report for unauthorized activity, especially activity that may indicate fraud and identity theft. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting agencies.

To order your annual free credit report please visit www.annualcreditreport.com or call toll free at **1-877-322-8228**.

You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's ("FTC") website at www.consumer.ftc.gov) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents: You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

Fraud Alerts. There are two types of fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft and you have the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies.

Security Freeze. You have the ability to place a security freeze, also known as a credit freeze, on your credit report free of charge.

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, you may use an online process, an automated telephone line, or submit a written request to any of the three credit reporting agencies listed above. 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 5 years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include 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, and display your name, current mailing address, and the date of issue.

Federal Trade Commission and State Attorneys General Offices. 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 home state. You may also contact these agencies for information on how to prevent or minimize the risks of identity theft.

You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, www.ftc.gov/bcp/edu/microsites/idtheft/, 1-877-IDTHEFT (438-4338).

For Maryland residents: You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us, 1-888-743-0023.

For North Carolina residents: You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov, 1-877-566-7226.

For 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/>.

For Connecticut residents: You may contact the Connecticut Office of the Attorney General, 165 Capitol Avenue, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag.

For Massachusetts residents: You may contact the Office of the Massachusetts Attorney General, 1 Ashburton Place, Boston, MA 02108, 1-617-727-8400, www.mass.gov/ago/contact-us.html

Reporting of identity theft and obtaining a police report.

For Iowa residents: You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

For Massachusetts residents: You have the right to obtain a police report if you are a victim of identity theft.

For Oregon residents: You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Triple Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data at any of the three national credit bureaus—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you will have the option to call a Kroll fraud specialist, who will be able to help you determine if it is 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 will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.