

EVAN D. WOLFF (202) 624-2615 EWolff@crowell.com

November 30, 2018

VIA FIRST CLASS MAIL and E-Mail (DOJ-CPB@DOJ.NH.gov)

The Honorable Gordon J. MacDonald Attorney General, State of New Hampshire 33 Capitol Street Concord, NH 03301

Dear Mr. Attorney General:

We represent Belmont Instrument LLC ("Belmont") with respect to an incident involving the potential exposure of certain personal information as described below. Belmont has hired Experian, a leading identity theft protection provider, to offer impacted individuals two years of complimentary IdentityWorks services.

# 1. Nature of the event

On August 28, 2018, Belmont was alerted to anomalous activity within certain company email accounts. Belmont promptly worked with its IT services provider to confirm the issue and scope of impact, as well as conduct an internal investigation to understand the nature of the event. Based on the investigation to date, it appears that an unidentified user was able to gain unauthorized access to several email accounts belonging to Belmont employees. The investigation has identified one account whose emails included the personal information of current and former Belmont employees, including names and social security numbers, as well as financial information such as user payment card information, of five (5) New Hampshire residents. At this time, there is no evidence that these residents' information was actually accessed or acquired, but Belmont is currently unable to conclusively eliminate this possibility.

# 2. Number of Massachusetts residents affected

Based on the investigation, five (5) New Hampshire residents were potentially affected. Out of an abundance of caution, however, Belmont is sending formal notification letters to all current employees, as well as former employees during the covered time period, which includes thirteen (13) additional New Hampshire residents. While Belmont has already been in communication with the potentially affected individuals, a formal notification letter was sent to the individuals on November 30 via regular mail. A copy of the notification letter is included with this letter.

The Honorable Gordon J. MacDonald November 30, 2018 Page 2

# 3. Steps taken and plans relating to the event

Specific steps are being taken to better protect Belmont's systems and information. These steps include implementing strong password policies and two-factor authentication for email. Belmont also initiated an investigation, which remains ongoing, to determine the nature and scope of this incident, perform remediation, obtain the names of potentially impacted individuals, and secure identity protection services for this population.

Belmont is currently working to further strengthen its security and mitigate risk to protect from further unauthorized access. In addition to two-factor authentication for email access, this includes upgrading the corporate firewall and VPN client, providing continuous security awareness testing and training, and implementing the cybersecurity software Mimecast for email security and threat protection.

As an added precaution, Belmont also arranged for Experian to provide the potentially impacted individuals with two years of complimentary IdentityWorks identity protection services, which includes credit and, \$1 million identity theft reimbursement insurance, and fully-managed identity theft recovery services.

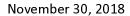
# 4. Contact information

If you have any additional questions, please contact Evan Wolff at <u>EWolff@crowell.com</u> or (202) 624-2615 during business hours.

Sincerely,

Evan D/Wolff

Enclosure







RE: Important Security Notification Please read this entire letter.

#### **NOTICE OF DATA BREACH**

Dear Sample A Sample:

We are contacting you regarding a data security incident that occurred on August 28, 2018 at Belmont Instrument LLC ("Belmont").

## What Happened?

On August 28, 2018, Belmont was alerted to anomalous activity within certain company e-mail accounts. Belmont promptly worked with its IT services provider to confirm the issue and scope of impact, as well as conduct an internal investigation to understand the nature of the event. Based on the investigation to date, it appears that an unidentified user was able to gain unauthorized access to several email accounts belonging to Belmont employees. The investigation has identified one account whose emails included personal information of current and former Belmont employees, including names, driver's license numbers, social security numbers, addresses, and financial information such as user credit or debit card information, or other account details.

#### What Information Was Involved?

This incident may have involved your personal information, potentially including your name, driver's license number, social security number, and financial information such as payment card numbers or other account details. At this time, there is no evidence that your information was actually accessed or acquired, but Belmont is currently unable to conclusively eliminate this possibility.

# What We Are Doing:

To help protect your identity, we are offering a complimentary two-year membership of Experian's® IdentityWorks<sup>SM</sup> service. This product provides you with superior identity detection and resolution of identity theft. Belmont is currently working to further strengthen its security and mitigate risk to protect from further unauthorized access. This includes implementing two-factor authentication for email access, upgrading the corporate firewall and VPN client, providing continuous security awareness testing and training, and implementing the cybersecurity software Mimecast for email security and threat protection.

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#### What You Can Do:

To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you enroll by: 2/28/2019 (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: https://www.experianidworks.com/3bcredit
- Provide your activation code: ABCDEFGHI

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-890-9332 by **2/28/2019**. Be prepared to provide engagement number **ENGAGEMENT** as proof of eligibility for the identity restoration services by Experian.

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.

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.

<u>Place Fraud Alerts with the three credit bureaus</u>. 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.alerts.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

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.

Security Freeze. By placing a security freeze, someone who fraudulently acquires your personal 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 in writing 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. The cost of placing the freeze varies by the state you live in and for each credit reporting bureau. The Credit Bureau may charge a fee of up to \$5.00 to place a freeze, lift, or remove a freeze. However, if you are a victim of identity theft and have filed a report with your local law enforcement agency or submitted an ID Theft Complaint Form with the Federal Trade Commission, there may be no charge to place the freeze.

#### ADDITIONAL DETAILS REGARDING YOUR 24-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, Equifax and Transunion files for indicators of fraud.
- Identity Restoration: Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- ◆ Experian IdentityWorks ExtendCARE™: You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- ◆ Up to \$1 Million Identity Theft Insurance\*\*: Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at 877-890-9332. 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 (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 this Identity Restoration support is available to you for one year 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 <a href="https://www.ExperianIDWorks.com/restoration">www.ExperianIDWorks.com/restoration</a>. You will also find self-help tips and information about identity protection at this site.

# For More Information

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.privacy.ca.gov) for additional information on protection against identity theft.

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All US Residents: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, <a href="https://www.identitytheft.gov/">https://www.identitytheft.gov/</a>, 1-877-IDTHEFT (438-4338), TTY: 1-866-653-4261.

We sincerely apologize for this incident and regret any inconvenience it may cause you. Should you have questions or concerns regarding this matter, please do not hesitate to contact us at 978-696-9180.

Sincerely,

Thomas Doyle
Chief Information Officer

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<sup>\*</sup> Offline members will be eligible to call for additional reports quarterly after enrolling.

<sup>\*\*</sup> Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions and exclusions of coverage. Coverage may not be available in all jurisdictions.