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JUL 01 2021

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CONSUMER PROTECTION

June 30, 2021

VIA FEDERAL EXPRESS

The Honorable John Formella
Office of the Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Notice of Data Breach

Dear Attorney General Formella:

I am writing on behalf of Best Friends Pet Care, Inc. ("Best Friends"), with a headquarters located at 535 Connecticut Ave, Suite 305, Norwalk, CT 06854, to provide a report of a recent data breach. Best Friends provides pet care facilities, boarding, grooming, daycare, training, veterinary care, and pet products.

On April 8, 2021, in the course of a forensics investigation of Best Friends' systems relating to a wire fraud, Best Friends' forensic investigator informed the company that unauthorized parties may have had access to personal information of certain employees, dependents, and vendors. The wire fraud was the result of a phishing email that led to a threat actor's access to several of Best Friends' employees' e-mail accounts. The investigation further revealed that the threat actor had access to these e-mail accounts sometime between November 30, 2020 and February 5, 2021. While we have no evidence that any personal information was exfiltrated from these accounts (it appears that the threat actor's primary purpose was to engage in wire transfer fraud) the fact that the threat actor could have viewed personal information has caused Best Friends to take action to notify the individuals whose information was available in the impacted accounts, and to notify your office.

While Best Friends learned that personal information was involved on April 8, 2021, the nature of the data that appeared to be involved was such that addresses for the impacted individuals were not immediately present. As such, Best Friends further engaged a third-party vendor to use the personal information that was available from the investigation to help identify the contact information for the impacted individuals so that Best Friends could notify the individuals of the incident. The vendor provided a first batch of this information to Best Friends on June 9, 2021 and confirmed the addresses for the individuals from that batch on June 23,

2021. This batch of data revealed that 32 New Hampshire residents had information involved in the breach. The vendor provided a second batch of information to Best Friends on June 25, 2021, and this batch revealed that an additional New Hampshire resident had information involved in the breach, for a total of 33 New Hampshire residents. This work is still ongoing. If the data still being analyzed turns up additional New Hampshire residents, we will provide a supplemental notice to your office.

The personal information that may have been accessed in Best Friend's systems includes certain New Hampshire residents' social security numbers, health insurance information, health provider name, health treatment and diagnosis information, dates of birth, driver's license or government-issued identification numbers, or in some cases, a combination of the foregoing.

While we recognize that some of this information is not deemed "personal information" subject to notification under N.H. Rev. Stat. § 359-C:19, Best Friends is notifying impacted individuals of the breach of this information out of an abundance of caution. Notices are being sent to the impacted individuals beginning on June 30, 2021.

Best Friends contained the incident and immediately commenced an investigation. Best Friends also retained a forensic expert and notified the FBI of the incident. In addition, Best Friends is offering each impacted New Hampshire resident a complimentary 12-month membership in Kroll's Credit Monitoring, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration services.

I have enclosed a copy of the form of notification letter that is being sent to affected individuals beginning on June 30, 2021. As you will see, among other things, the letter describes various steps that affected individuals can take to protect themselves, provides contact information for consumer reporting agencies and relevant governmental agencies, and provides information about enrolling in the credit monitoring services that Best Friends will provide to the impacted New Hampshire residents at no cost. Also enclosed is an Appendix which will serve as a key for your reference to the "text" fields in the letter, which are variables depending on the particular personal information involved.

If you have questions about this incident, please feel free to contact me at the email or phone numbers listed above.

Sincerely,



Janet P. Peyton

Enclosure: Template Notification Letter w/Appendix



<<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 you on behalf of Best Friends Pet Care, Inc. (“Best Friends” or the “Company”) with important information about a data security incident that occurred at Best Friends. Best Friends takes the protection and proper use of your personal information very seriously. We are, therefore, contacting you to explain the incident and provide you information about security measures you can take to protect yourself and your personal information.

What Happened:

On or about April 8, 2021, in the course of a forensics investigation of the Company’s systems unrelated to personal information, the Company’s investigation vendor informed us that unauthorized parties may have had access to personal information as the result of the unauthorized parties’ access to several of the Company’s employee e-mail accounts. The investigation revealed that the unauthorized parties had access to these e-mail accounts sometime between November 30, 2020 and February 5, 2021. <<b2b_text_1 (Variable Sentence)>> This notice was not delayed as the result of a law enforcement investigation.

What Information Was Involved:

This incident involved your <<b2b_text_2 (Compromised Data)>>. As a result, your personal information may have been exposed to others. While it is not certain that your personal information was in fact accessed, we are sending you this notice out of an abundance of caution.

What We Are Doing:

We have taken actions to mitigate the incident, including notifying law enforcement, successfully locking out the unauthorized users from the Company’s system, and undertaking a full forensic investigation of the incident.

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 12 months. 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, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

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

Membership Number: <<subscriber_number>>

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. 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 **1-855-731-3353**, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time. Please have your membership number ready.

Protecting 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.

You should also report any suspected incident of identity theft to law enforcement and you can obtain a copy of any resulting police report. You should also notify your state Attorney General and the FTC.

We sincerely apologize for this incident and regret any inconvenience it may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Pulley', with a stylized flourish at the end.

Thomas Pulley
Vice President of Finance

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 19016, 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, Maryland, and New Jersey 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 Rhode Island residents: You may contact the RI Office of the Attorney General, 150 South Main Street, Providence, RI 02903, (401) 274-4400;

<http://www.riag.gov/ConsumerProtection/About.php#>.

ChexSystems

If your bank account information was involved in the incident, you may place a security alert and/or security freeze with ChexSystems by visiting <https://www.chexsystems.com> or calling (800) 428-9623.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

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

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll 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.

Web Watcher

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

Public Persona

Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you will receive an alert.

Quick Cash Scan

Quick Cash Scan monitors short-term and cash-advance loan sources. You will receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.

\$1 Million Identity Fraud Loss Reimbursement

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

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.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

APPENDIX TO SAMPLE NOTIFICATION LETTER

Key to Variable Fields:

Text 1: Unique field for Rhode Island residents only:

“At this time, we believe the incident affected four Rhode Island residents.”

Text 2: Describes the nature of the PII and includes one of the following:

- “date of birth”
- “social security number”
- “digital signatures”
- “date of birth and a copy of your birth/marriage certificate”
- “date of birth and driver’s license or state issued ID number”
- “date of birth and health insurance information”
- “date of birth and social security number”
- “social security number, account number, routing number, and financial institution name”
- “social security number, account number, and routing number”
- “social security number, account number, routing number, financial institution name, and health insurance information”
- “date of birth and incidental health reference”
- “date of birth, social security number, account number, routing number, financial institution name, and health insurance information”
- “date of birth, social security number, account number, routing number, financial institution name, and treatment information/diagnosis”
- “date of birth, social security number, account number, routing number, financial institution name, health insurance information, and digital signatures”
- “date of birth, social security number, and driver’s license or state issued ID number”
- “date of birth, social security number, and health insurance information”
- “date of birth, social security number, health insurance information, and digital signatures”
- “date of birth, social security number, and incidental health reference”
- “date of birth, social security number, and treatment information/diagnosis”
- “date of birth, social security number, credit/debit card number, and health insurance information”
- “date of birth, social security number, credit/debit card number, and incidental health reference”
- “date of birth, social security number, driver’s license or state issued identification number, account number, routing number, and financial institution name”
- “social security number, driver’s license or state issued ID number, account number, routing number, financial institution name, and health insurance information”
- “social security number, driver’s license or state issued ID number, and health insurance information”

- “social security number, account number, routing number, and digital signatures”
- “social security number, treatment information/diagnosis, and health insurance information”
- “social security number, treatment information/diagnosis, and prescription information”
- “date of birth, social security number, driver’s license or state issued ID number, and health insurance information”
- “date of birth, social security number, driver’s license or state issued ID number, health insurance information, and digital signatures”
- “date of birth, account number, routing number, financial institution name, credit/debit card number, health insurance information, and digital signatures”
- “date of birth, social security number, incidental health reference, and health insurance information”
- “date of birth, social security number, incidental health reference, treatment information/diagnosis, and health insurance information”
- “date of birth, social security number, incidental health references, treatment information/diagnosis information, and provider name”
- “date of birth, social security number, incidental health references, treatment information/diagnosis, provider name, and health insurance information”
- “date of birth, social security number, incidental health references, treatment information/diagnosis, provider name, health insurance information, and treatment cost information”
- “date of birth, social security number, incidental health references, treatment information/diagnosis, provider name, MRN/patient ID, and health insurance information”
- “date of birth, social security number, passport number, and driver’s license or state issued ID number”
- “date of birth, social security number, passport number, and health insurance information”
- “date of birth, social security number, passport number, treatment information/diagnosis, prescription information, provider name, health insurance information, and treatment cost information”
- “date of birth, social security number, treatment information/diagnosis, and health insurance information”
- “date of birth, social security number, treatment information/diagnosis, and health provider name”
- “date of birth, social security number, treatment information/diagnosis, prescription information, provider name, and health insurance information”
- “date of birth, social security number, treatment information/diagnosis, prescription information, provider name, health insurance information and treatment cost information”
- “date of birth, social security number, treatment information/diagnosis, prescription information, provider name, MRN/patient ID, health insurance information, and treatment cost information”
- “date of birth, social security number, treatment information/diagnosis, provider name, and health insurance information”

- “date of birth, social security number, treatment information/diagnosis, provider name, MRN/patient ID, health insurance information, and treatment cost information”
- “date of birth, social security number, U.S. alien registration number, driver’s license or state issued ID number, and health insurance information”
- “driver’s license or state issued ID number”
- “social security number and health insurance information”
- “social security number and incidental health references”
- “social security number and treatment information/diagnosis”
- “date of birth and treatment information/diagnosis”
- “date of birth, incidental health reference, and treatment information/diagnosis”
- “incidental health reference”
- “provider name”
- “incidental health reference and treatment information/diagnosis”
- “treatment information/diagnosis”
- “treatment information/diagnosis, provider name, MRN/Patient ID, and treatment cost information”
- “treatment information/diagnosis, provider name, and MRN/Patient ID”

ORIGIN ID:GVIEA (804) 775-1000
 JANET P. PEYTON
 MCGUIREWOODS,LLP
 800 EAST CANAL STREET
 GATEWAY PLAZA BUILDING
 RICHMOND, VA 23219
 UNITED STATES US

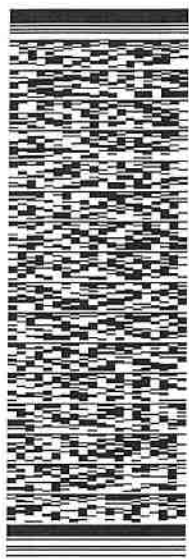
SHIP DATE: 30JUN21
 ACTWGT: 0.50 LB
 CAD: 250191555MWSX3400

BILL SENDER

TO THE HONORABLE JOHN FORMELLA
 OFFICE OF THE ATTORNEY GENERAL
 33 CAPITOL ST

CONCORD NH 03301
 (804) 775-7525 REF: 20773920017
 INV. DEPT.

56D.L20265/FE4A



J211221032101

TRK# 2809 6695 0960
 0201

THU - 01 JUL 10:30A
 PRIORITY OVERNIGHT

XH HIEA

03301
 NH-US MHT



 FOLD on this line and place in shipping pouch with bar code and delivery address visible

1. Fold the first printed page in half and use as the shipping label.
2. Place the label in a waybill pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.
3. Keep the second page as a receipt for your records. The receipt contains the terms and conditions of shipping and information useful for tracking your package.

Legal Terms and Conditions

Tendering packages by using this system constitutes your agreement to the service conditions for the transportation of your shipments as found in the applicable FedEx Service Guide, available upon request. FedEx will not be responsible for any claim in excess of the applicable declared value, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the applicable FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of 100 USD or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is 500 USD, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see applicable FedEx Service Guide. FedEx will not be liable for loss or damage to prohibited items in any event or for your acts or omissions, including, without limitation, improper or insufficient packaging, securing, marking or addressing, or the acts or omissions of the recipient or anyone else with an interest in the package. See the applicable FedEx Service Guide for complete terms and conditions. To obtain information regarding how to file a claim or to obtain a Service Guide, please call 1-800-GO-FEDEX (1-800-463-3339).