

BakerHostetler

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CONSUMER PROTECTION

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May 31, 2019

Via overnight mail

Attorney General Gordon MacDonald
New Hampshire Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Incident Notification

Dear Attorney General MacDonald:

We are writing on behalf of our client, Brattleboro Savings & Loan Association (“BS&L”), to notify you of a security incident.

BS&L recently concluded its investigation into an email phishing campaign that targeted one of its employees. Upon learning of the incident, BS&L immediately took steps to secure the account and launched an internal investigation. The investigation determined that an unauthorized person accessed one employee’s email account between March 12, 2019 and March 13, 2019. The investigation was not able to determine which emails and attachments were viewed by the unauthorized person(s). BS&L therefore conducted a thorough review of the contents of the email account involved and, on April 18, 2019, determined that an email or attachment contained one or more of the following data points of two New Hampshire residents: Social Security number or financial account number.

On May 31, 2019, BS&L will mail notification letters to two New Hampshire residents in accordance with N.H. Rev. Stat. § 359-C:20, via United States First-Class mail, in substantially the same form as the enclosed letter.¹ Notice is being provided to the individuals as soon as possible and without delay. BS&L is offering eligible New Hampshire residents a complimentary one-year membership in credit monitoring and identity theft protection services through Experian and is providing a telephone number to call with any questions about the incident.

¹ This notice does not waive BS&L’s objection that New Hampshire lacks personal jurisdiction over BS&L regarding any claims related to this incident.

May 31, 2019

Page 2

BS&L takes the security of personal information seriously. To further enhance its security measures, BS&L is re-educating employees regarding phishing emails and enhancing its existing security measures.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric A. Packel". The signature is fluid and cursive, with the first name "Eric" and last name "Packel" clearly distinguishable.

Eric A. Packel
Partner

Enclosure

BS&L Logo

<Date>

<Name>

<Address>

<City>, <State> <Zip code>

Dear <Name>:

Brattleboro Savings & Loan (“BS&L”) recognizes the importance of protecting the privacy of personal information. We are writing to inform you of a recent security incident that may have involved that information. This letter explains the incident, measures we have taken, and steps you can take in response.

We recently concluded our investigation into an email phishing attempt that targeted one of our employees. Immediately upon learning of the incident, we took all necessary steps to secure the account and launched an internal investigation. Our investigation determined that an unauthorized person accessed one employee’s email account between March 12 and March 13, 2019. The investigation was not able to determine which emails and attachments may have been viewed by the unauthorized actor. We therefore conducted a thorough review of the entire contents of the email account involved and, on April 18, 2019, determined that it contained some of your personal information, including your name <<insert variable text>>.

To date, we have no evidence, nor do we believe that any of your information was accessed. Nevertheless, as a precaution, and if you are interested, we have arranged for you to receive a complimentary one-year membership of Experian’s® IdentityWorksSM. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorksSM is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorksSM, including instructions on how to activate your complimentary one-year membership, as well as some additional steps you can take in response, please see the additional information provided in this letter.

Again, while we do not believe any of your information was accessed, we take the security of your personal information very seriously. To help prevent a similar incident from occurring in the future, we are re-educating employees regarding phishing emails and enhancing existing security measures.

If you have any questions, please call <<number>>.

Sincerely,

<<name>>

<<title>>

Activate IdentityWorks Credit Now in Three Easy Steps

1. ENROLL by: **8/31/2019** (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: www.experianidworks.com/3bcredit
3. PROVIDE the **Activation Code**: <<Enrollment Code>>

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 **8/31/2019**. Be prepared to provide engagement number **DB12701** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **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 two years 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. You will also find self-help tips and information about identity protection at this site.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** 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.

Additional Steps You Can Take

Regardless of whether you choose to take advantage of this complimentary credit monitoring service, we remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

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 state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Centre, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft