



MULLEN
COUGHLIN^{LLC}
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STATE OF NH
DEPT. OF JUSTICE

2019 JAN 28 P 3: 13

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January 22, 2019

VIA U.S. MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Security Incident

Dear Attorney General Gordon J. MacDonald,

We represent Capital City Bank Group, Inc. ("Capital City") located at 1860 Capital Circle, N.E., Tallahassee, FL 32308 and are writing to notify your office of an incident that may affect the security of some personal information relating to four (4) New Hampshire residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Capital City 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 or about January 2, 2019, Capital City was alerted to the fact that an associate inadvertently emailed a report to a current Capital City client. Capital City immediately reached out to the unintended individual recipient to request deletion of the report. The unintended recipient confirmed deletion of the report on January 4, 2019.

The personal information that could have been subject to unauthorized access includes name, address, loan account number, and tax identification number.

Notice to New Hampshire Residents

Capital City provided written notice of this incident on January 22, 2019 to the four (4) New Hampshire residents affected by this event. Written notice was provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, Capital City moved quickly to investigate and respond to the incident, ensure deletion of the inadvertently sent report and notify potentially affected individuals. Capital City is providing access to credit monitoring services for one (1) year, through Kroll, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Capital City 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. Capital City is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4786.

Very truly yours,



Ryan C. Loughlin of
MULLEN COUGHLIN LLC

RCL/alc
Enclosure

EXHIBIT A

Re: Data Security Event Involving Your Personal Information

Dear _____ :

We are writing to notify you of a data security event that may affect certain information relating to you. We take the security of your personal information very seriously, and we apologize for any concern and inconvenience this may cause you. This letter contains details about the incident and our response, steps you can take to protect your information and resources we are making available to help you.

What happened? On January 2, 2019, we were alerted to the fact that an associate of our company inadvertently e-mailed a report to a current Capital City client by mistake. We immediately reached out to the unintended individual recipient to request deletion of the report. The unintended recipient confirmed deletion of the report on January 4, 2019.

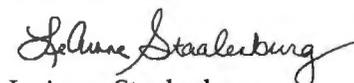
What information was involved? It was determined that the information present in the report included your name, address, Tax Identification Number and other related loan information.

What we are doing. There is no reason to believe your information has been misused, but in an abundance of caution, we are taking proactive steps to ensure your current and future security. We have engaged the services of Kroll to provide identity monitoring at no cost to you for one year. 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. Instructions on how to activate these services are included in the enclosed Notice of Privacy Safeguards. As your trusted financial institution, we take the security of your information very seriously, and apologize for any concern or inconvenience this matter may cause.

What you can do. We encourage you to activate the complimentary credit monitoring and identity restoration services offered and review the information on protecting yourself against identity theft and fraud provided in the enclosed Notice of Privacy Safeguards. If you have questions about the incident, this letter or Kroll's identity monitoring and protection services, please contact me directly at 850.402.7135 between 9 a.m. and 5 p.m. ET, Monday through Friday.

We regret any inconvenience this incident may cause.

Your banker,



LeAnne Staalenburg

Senior Vice President, Corporate Security & Risk

NOTICE OF PRIVACY SAFEGUARDS

We encourage you to activate the fraud detection tools available through Kroll. To start monitoring your personal information please follows the steps below.

To enroll in Kroll's credit monitoring services:

1. You must activate your identity monitoring services by April 11, 2019. Your Activation Code will not work after this date.
2. Visit **redeem.kroll.com** to activate your identity monitoring services.
3. Provide Your Activation Code: _____ and Your Verification ID: _____
4. To sign in to your account after you have activated your identity monitoring services, please visit krollbreach.idmonitoringservice.com.

If you have questions, please call 877.903.9574, Monday through Friday from 9 a.m. to 6:30 p.m. Eastern Time.

You've 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 can help you determine if it's 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 can dig deep to uncover the scope of the identity theft, and then work to resolve it.

We encourage you to remain vigilant, review your account statements regularly and monitor your credit reports for suspicious activity. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 877.322.8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

At no charge, you can have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

You also have the right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security 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 security

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 security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Equifax	Experian	TransUnion
P.O. Box 105069	P.O. Box 2002	P.O. Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19022-2000
800.525.6285	888.397.3742	800.680.7289
www.equifax.com	www.experian.com	www.transunion.com

You can further educate yourself regarding identity theft, security freezes, and the steps you can take to protect yourself by contacting the Federal Trade Commission or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.ftc.gov/idtheft, 877.ID.THEFT (877.438.4338); TTY: 866.653.4261. The Federal Trade Commission also encourages those who discover 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. This notice has not been delayed because of law enforcement; however, instances of known or suspected identity theft should also be reported to law enforcement.

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 877.566.7226 or 919.716.6400, www.ncdoj.gov.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 888.743.0023, www.oag.state.md.us. Capital City Bank Group is located at 1860 Capital Circle Northeast, Tallahassee, FL 32308.

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 agencies 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.