

ALSTON & BIRD

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James A. Harvey

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RECEIVED

APR 26 2021

CONSUMER PROTECTION

April 22, 2021

**CONFIDENTIAL
VIA U.S. MAIL**

New Hampshire Department of Justice
33 Capitol Street
Concord, NH 03301

Attorney General Formella:

We are writing to you in our capacity as counsel for Cayan, LLC (Cayan). Cayan was the victim of a ransomware attack in which a threat actor had access to systems that support certain corporate back-office functions of Cayan's merchant processing business between October 29, 2020 and November 18, 2020 and claimed to have exfiltrated a significant amount of data. The company did not engage with the threat actor. Cayan first learned of potentially suspicious activity through a third party in the financial services industry on November 16, 2020.

The threat actor published data to the dark web in multiple installments between December 1, 2020 and January 11, 2021. The data was difficult to obtain from the threat actor's website, and our review of the data has been time and resource intensive. During our review, we discovered that the impacted data included personal information of 21 New Hampshire residents, five (5) of which are current Cayan employees.

As a courtesy to our employees, we proactively notified our workforce via email of the incident on February 2, 2021 (even before confirming that their data was impacted by the incident). This notification included an offer of credit monitoring and identity theft protection services for no charge via Equifax. We notified the impacted New Hampshire residents in accordance with New Hampshire law on April 22, 2021 by U.S. mail and offered credit monitoring and identity theft protection services for two years at no charge via Equifax.

If you have further questions, please do not hesitate to contact us.

Sincerely,



James A. Harvey
Partner



CAYAN

Dear [REDACTED]

As you may be aware, we were recently the victim of a ransomware attack involving systems that support certain corporate back office functions of Cayan's merchant business. We sincerely regret this incident occurred and any inconvenience or concern it may cause you. Our team members are our most valuable asset, and we want to assure you that protecting the information entrusted to us by you, as well as our customers, is our top priority.

At this time, we have not confirmed that the personal information of any North America-based Cayan team members was impacted. Nevertheless, out of an abundance of caution, while we continue our investigation and because our team members are so valuable to us, we have arranged to provide all of our North America-based Cayan team members with credit monitoring and identity theft protection services for two years at no charge via Equifax. If you would like to enroll in these services, please register at https://myservices.equifax.com/efx1_bresqis using the promotion code [REDACTED] before May 28, 2021. Please note, if you currently have, or have previously had an Equifax service, you will not be able to register online. Please contact the Equifax Customer Care Team at 866-363-8642. They are available Monday through Friday from 9am to 9pm Eastern Standard Time.

While the attackers claimed to have taken certain files that could contain our team members' personal information, we are still assessing the information that may have been stolen. We are working through a careful review of the data, but such a review takes time, and we did not want to delay in providing this benefit to you. If it turns out that your personal information was not impacted, you will retain these benefits at no cost.

Meanwhile, we encourage you to remain vigilant in reviewing your financial statements and credit reports and to promptly report any suspicious activity or suspected identity theft to proper law enforcement authorities, including your local law enforcement agency or your state's attorney general.

Thank you for your patience as we work through the review. If you have additional questions, please contact 866-363-8642.

Sincerely,

Robert Cortopassi
President, Global Payments Integrated
For and on behalf of Cayan



Cayan LLC
101 Arch Street, Suite 900
Boston MA 02110
Attn: Michael Gavin

April 19, 2021

000001



USA

NOTICE OF DATA BREACH

Dear [REDACTED],

We are writing to inform you of a recent security incident that involved some of your personal information. We take the privacy and security of your personal information very seriously and want you to understand how the issue is being addressed and what you can do to protect yourself.

What Happened

Cayan, LLC (Cayan) was recently the victim of a ransomware attack in which a threat actor had access to systems that support certain corporate back-office functions of Cayan's merchant processing business between October 29, 2020 and November 18, 2020. The merchant processing environment itself was not impacted.

What Information Was Involved

During our review of the impacted data, we discovered that the impacted data includes your:

- [REDACTED]

What We Are Doing

Upon discovering the incident, we immediately took preventative action to isolate and contain all systems, launched an investigation, notified law enforcement, and retained third-party forensic experts. Cayan has also replaced and further secured the impacted portion of the affected environment. The replacement environment includes additional alerting and Multi-Factor Authentication (MFA), and we have also re-tuned and expanded our Data Loss Prevention (DLP) measures. To further assist you, we have arranged to provide you with credit monitoring and identity theft protection services for two years at no charge via Equifax.

What You Can Do

To enroll in the credit monitoring and identity theft protection services, please register at equifax.com/activate using the promotion code [REDACTED] before **August 31, 2021**. Please note, if you currently have, or have previously had an Equifax service, you will not be able to register online. Please contact Equifax's Customer Care Team [REDACTED]. They are available Monday through Friday from 9am to 9pm Eastern Standard Time.

We also encourage you to remain vigilant in reviewing your financial statements and credit reports and to promptly report any suspicious activity or suspected identity theft to proper law enforcement authorities, including your local law enforcement agency or your state's attorney general.

For More Information

The attached Reference Guide contains additional information on steps you can take to protect yourself from identity theft, including placing fraud alerts and security freezes. You may also obtain this information from consumer reporting agencies and the Federal Trade Commission.

We sincerely regret this incident occurred and any inconvenience or concern it may cause you. If you have additional questions, please contact the Customer Care Team at [REDACTED].

Sincerely,



Robert Cortopassi
For and on behalf of Cayan, LLC



Reference Guide

Order Your Free Credit Report

To order your free annual credit report, visit www.annualcreditreport.com, call toll-free at 877-322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's ("FTC") website at www.ftc.gov and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. The three credit bureaus (Equifax, Experian and TransUnion) provide free annual credit reports only through the website, toll-free number or request form. Upon receiving your credit report, review it carefully. Errors may be a warning sign of possible identity theft. Here are a few tips of what to look for:

- Look for accounts you did not open.
- Look in the "inquiries" section for names of creditors from whom you have not requested credit. Some companies bill under names other than their store or commercial names; the credit bureau will be able to tell if this is the case.
- Look in the "personal information" section for any inaccuracies in information (such as home address and Social Security Number).

If you see anything you do not understand, call the credit bureau at the telephone number on the report. Errors may be a warning sign of possible identity theft. You should notify the credit bureaus of any inaccuracies in your report, whether due to error or fraud, as soon as possible so the information can be investigated and, if found to be in error, corrected. If there are accounts or charges you did not authorize, immediately notify the appropriate credit bureau by telephone and in writing. Information that cannot be explained should also be reported to your local police or sheriff's office because it may signal criminal activity. You may file or obtain a police report.

Contact the U.S. Federal Trade Commission

If you detect any unauthorized transactions in any of your financial accounts, promptly notify the appropriate payment card company or financial institution. If you detect any incidence of identity theft or fraud, promptly report the matter to your local law enforcement authorities, state Attorney General and the FTC. You can contact the FTC to learn more about how to protect yourself from becoming a victim of identity theft by using the contact information below:

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

Place a Fraud Alert on Your Credit File

To protect yourself from possible identity theft, you have the right to place a fraud alert on your credit file for one year at no cost. A fraud alert helps protect against the possibility of an identity thief opening new credit accounts in your name. When a credit grantor checks the credit history of someone applying for credit, the credit grantor gets a notice that the applicant may be the victim of identity theft. The alert notifies the credit grantor to take steps to verify the applicant's identity. You can place a fraud alert on your credit report by calling any of the toll-free fraud numbers provided below. You will reach an automated telephone system that allows flagging of your file with a fraud alert at all three credit bureaus.

<p>Equifax P.O. Box 740241 Atlanta, GA 30348 800-525-6285 www.equifax.com</p>	<p>Experian P.O. Box 2002 Allen, TX 75013 888-397-3742 www.experian.com</p>	<p>TransUnion P.O. Box 2000 Chester, PA 19016 800-680-7289 www.transunion.com</p>
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Security Freezes

You have the right to put a security freeze, also known as a credit freeze, on your credit file free of charge, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A security freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a security freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a security freeze may delay your ability to obtain credit.

Unlike a fraud alert, you must contact the credit reporting agency by phone, mail, or secure electronic means and provide proper identification of your identity. To place a security freeze on your credit report you need to send a request to a consumer reporting agency by certified mail, overnight mail, or regular stamped mail. 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 five 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, display your name and current mailing address, and the date of issue.

Below, please find relevant contact information for the three consumer reporting agencies:

Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 800-685-1111 www.equifax.com	Experian Security Freeze P.O. Box 9554 Allen, TX 75013 888-397-3742 www.experian.com	TransUnion P.O. Box 2000 Chester, PA 19016 888-909-8872 www.transunion.com
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Once you have submitted your request, the credit reporting agency must place the security freeze no later than one (1) business day after receiving a request by phone or secure electronic means, and no later than three (3) business days after receiving a request by mail. No later than five (5) business days after placing the security freeze, the credit reporting agency will send you confirmation and information on how you can remove the freeze in the future.

For Residents of the District of Columbia

You may obtain information about avoiding identity theft from the Office of the Attorney General for the District of Columbia: 400 6th Street NW Washington, D.C. 20001, 1-202-727-3400, <https://oag.dc.gov/>

For Residents of Iowa

You may report suspected incidents of identity theft to the Iowa Department of Justice Office of the Attorney General: Iowa Attorney General's Office, Director of Consumer Protection Division, 1305 E. Walnut Street, Des Moines, IA 50319, 1-515-281-5926, www.iowaattorneygeneral.gov

For Residents of Maryland

You may obtain information about avoiding identity theft from the Maryland Office of the Attorney General: Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us

For Residents of New Mexico

You have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information, please visit www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf or www.ftc.gov
You also have the right to place a security freeze or submit a declaration of removal under New Mexico's Fair Credit Reporting and Identity Security Act.

For Residents of New York

You may obtain information regarding security breach response and identity theft protection from the New York State Office of the Attorney General: 1-800-771-7755 <https://ag.ny.gov/> or Bureau of Internet and Technology, 1-212-416-8433, <https://ag.ny.gov/internet/resource-center>

For Residents of North Carolina

You may obtain information about preventing identity theft from the North Carolina Department of Justice: North Carolina Department of Justice, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, www.ncdoj.gov

For Residents of Oregon

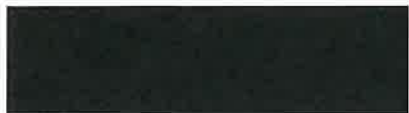
You may report suspected identity theft to Oregon Department of Justice: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301, 1-503-378-4320, www.doj.state.or.us



Cayan LLC
101 Arch Street, Suite 900
Boston MA 02110
Attn: Michael Gavin

April 19, 2021

000004



USA

NOTICE OF DATA BREACH

Dear 

This letter follows our February 2, 2021 email regarding a security incident affecting Cayan, LLC (Cayan) to inform you that the security incident involved some of your personal information.

What Happened

As set forth in that email, Cayan was recently the victim of a ransomware attack in which a threat actor had access to systems that support certain corporate back-office functions of Cayan's merchant processing business between October 29, 2020 and November 18, 2020.

What Information Was Involved

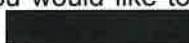
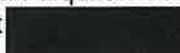
During our review of the impacted data, we discovered that the impacted data includes your:

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What We Are Doing

Upon discovering the incident, we immediately took preventative action to isolate and contain all systems, launched an investigation, notified law enforcement, and retained third-party forensic experts. Cayan has also replaced and further secured the impacted portion of the affected environment. The replacement environment includes additional alerting and Multi-Factor Authentication (MFA), and we have also re-tuned and expanded our Data Loss Prevention (DLP) measures. To further assist you, we have arranged to provide you with credit monitoring and identity theft protection services for two years at no charge via Equifax.

What You Can Do

We recommend enrolling in the credit monitoring and identity theft protection services we recently offered you for two years at no charge via Equifax. If you would like to enroll in these services, please register at equifax.com/activate using the promotion code  before **June 30, 2021**. Please note, if you currently have, or have previously had an Equifax service, you will not be able to register online. Please contact Equifax's Customer Care Team at . They are available Monday through Friday from 9am to 9pm Eastern Standard Time.

We also encourage you to remain vigilant in reviewing your financial statements and credit reports and to promptly report any suspicious activity or suspected identity theft to proper law enforcement authorities, including your local law enforcement agency or your state's attorney general.

For More Information

The attached Reference Guide contains additional information on steps you can take to protect yourself from identity theft, including placing fraud alerts and security freezes. You may also obtain this information from consumer reporting agencies and the Federal Trade Commission.

Again, we sincerely regret this incident occurred and any inconvenience or concern it may cause you. If you have additional questions, please contact Michael Gavin, SVP Operations, at [REDACTED].

Sincerely,



Robert Cortopassi
For and on behalf of Cayan, LLC



Reference Guide

Order Your Free Credit Report

To order your free annual credit report, visit www.annualcreditreport.com, call toll-free at 877-322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's ("FTC") website at www.ftc.gov and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. The three credit bureaus (Equifax, Experian and TransUnion) provide free annual credit reports only through the website, toll-free number or request form. Upon receiving your credit report, review it carefully. Errors may be a warning sign of possible identity theft. Here are a few tips of what to look for:

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If you detect any unauthorized transactions in any of your financial accounts, promptly notify the appropriate payment card company or financial institution. If you detect any incidence of identity theft or fraud, promptly report the matter to your local law enforcement authorities, state Attorney General and the FTC. You can contact the FTC to learn more about how to protect yourself from becoming a victim of identity theft by using the contact information below:

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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 five 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, display your name and current mailing address, and the date of issue.

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For Residents of the District of Columbia

You may obtain information about avoiding identity theft from the Office of the Attorney General for the District of Columbia: 400 6th Street NW Washington, D.C. 20001, 1-202-727-3400, <https://oag.dc.gov/>

For Residents of Iowa

You may report suspected incidents of identity theft to the Iowa Department of Justice Office of the Attorney General: Iowa Attorney General's Office, Director of Consumer Protection Division, 1305 E. Walnut Street, Des Moines, IA 50319, 1-515-281-5926, www.iowaattorneygeneral.gov

For Residents of Maryland

You may obtain information about avoiding identity theft from the Maryland Office of the Attorney General: Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us

For Residents of New Mexico

You have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information, please visit www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf or www.ftc.gov
You also have the right to place a security freeze or submit a declaration of removal under New Mexico's Fair Credit Reporting and Identity Security Act.

For Residents of New York

You may obtain information regarding security breach response and identity theft protection from the New York State Office of the Attorney General: 1-800-771-7755 <https://ag.ny.gov/> or Bureau of Internet and Technology, 1-212-416-8433, <https://ag.ny.gov/internet/resource-center>

For Residents of North Carolina

You may obtain information about preventing identity theft from the North Carolina Department of Justice: North Carolina Department of Justice, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, www.ncdoj.gov

For Residents of Oregon

You may report suspected identity theft to Oregon Department of Justice: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301, 1-503-378-4320, www.doj.state.or.us