

January 24, 2023

Office of the Attorney General
Email: DOJ-CPB@doj.nh.gov

NOTICE OF CYBERSECURITY INCIDENT

To Whom it May Concern,

We are writing to inform your office of a potential cybersecurity incident identified by our company, CommuteAir, LLC.

Description of the Nature of the Cybersecurity Incident: On January 17, 2023, CommuteAir was notified by a journalist that a member of the security research community identified an unsecured development server containing certain personally identifiable information. CommuteAir took the affected server immediately offline, reset credentials related to the server and started an investigation to determine the extent of data access. On January 18, 2023, the security researcher provided additional observations. Specifically, through data located on the development server they discovered access to a database containing personal identifiable information of CommuteAir employees. At this point the CommuteAir investigation is still ongoing.

What Information Was Compromised: CommuteAir believes that employee information was accessible to the security researcher. This comprised of the last four digits of SSNs, employment status, job title, hire and/or termination date, name, address, date of birth, gender, country of citizenship and city of birth.

Additional Steps Taken: CommuteAir employed firewall changes to prevent the exposure of the development server to the internet and has changed account passwords that were potentially exposed via the server. Additionally, CommuteAir continues to work with a third-party cybersecurity firm that was retained to gather and analyze forensic data related to the incident, as well as assist CommuteAir with the implementation of additional security standards.

Number of New Hampshire Residents To Be Notified: 4

Additionally, a Sample Notice to be sent to affected individuals is attached hereto as Exhibit A. If any further information is necessary, please contact our legal counsel at Meyers, Roman, Friedberg & Lewis, 28601 Chagrin Blvd., Suite 600, Cleveland, Ohio 44122, 216-831-0042, Attn: David V. Croft Esq. and Elizabeth S. McCrea Esq.

Sincerely,

Rick Hoefling

President & Chief Executive Officer

EXHIBIT A

SAMPLE NOTICE

[Attached]

[DATE]

[EMAIL ADDRESS]

NOTICE OF DATA BREACH

Dear [INDIVIDUAL NAME]:

We respect the privacy of your information, which is why, as a precautionary measure, we are writing to let you know about a data security incident that may involve your personal information.

On January 17, 2023, CommuteAir LLC received notification from a security researcher of a potential data exposure of certain information maintained on a company server. This information included a 2019 sample of the federal no-fly list which was used for system testing, flight information and certain employee data. We took immediate steps to take the server offline and to investigate the extent of the data exposure and access.

WHAT STEPS ARE WE TAKING TO IMPROVE CYBERSECURITY: This incident is separate from the November 2022 data breach from a hacker. Since that time, we have been working with Mandiant, an industry-leading cybersecurity firm used by United Airlines, to modernize our systems and protocols. My cybersecurity team is using our Envision Design Build Activate (EDBA) project management system to implement their recommendations. You may have noticed, for instance, our new system for flagging suspicious emails. Mandiant is also engaged in this incident, and we have reported the exposure to the Cybersecurity and Infrastructure Security Agency (CISA). We will continue to upgrade and harden our systems throughout 2023.

WHAT INFORMATION WAS INVOLVED: The potential data exposed included personally identifiable information including name, date of birth, phone number, address, last four digits of social security number, and information specific to flight crews such as hours flown. Based on our investigation to date, the data accessed did not include any credit card information, payment information, or health-related information.

WHAT YOU CAN DO: If your data was exposed in the November 2022 breach, you received a subscription offer to LifeLock Defender™ Choice plan which provides multiple identity theft protection services. If you have not activated your subscription yet, you may still do so until April 20, 2023. If you joined CommuteAir since that time, within the next few days we will send a subsequent email with an offer code for the same subscription. Also, review the attachment to this letter (Steps You Can Take to Further Protect Your Information) for further additional actions you may take. My goal is to preserve the security of your personal information.

FOR MORE INFORMATION: For questions or assistance with your IT security, please contact my team at _____ or _____.

Sincerely,

Sincerely,

Radha Iyer

Chief Technology Officer

Steps You Can Take to Further Protect Your Information

- **Review Your Account Statements and Notify Law Enforcement of Suspicious Activity**

As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, including the Attorney General's Office in your state and/or the Federal Trade Commission (FTC). A matrix displaying the Attorney General's Office in each state is attached to this letter below.

To file a complaint with the FTC, go to IdentityTheft.gov or call 1-877-ID-THEFT (877-438-4338). Complaints filed with the FTC will be added to the FTC's Identity Theft Data Clearinghouse, which is a database made available to law enforcement agencies.

- **Obtain and Monitor Your Credit Report**

We recommend that you obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can access the request form at <https://www.annualcreditreport.com/requestReport/requestForm.action>. Or you can elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is provided below:

Equifax
(866) 349-5191
www.equifax.com
P.O. Box 740241
Atlanta, GA 30374

Experian
(888) 397-3742
www.experian.com
P.O. Box 2002
Allen, TX 75013

TransUnion
(800) 888-4213
www.transunion.com
2 Baldwin Place
P.O. Box 1000
Chester, PA 19016

- **Consider Placing a Fraud Alert on Your Credit Report**

You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

- **Take Advantage of Additional Free Resources on Identity Theft**

We recommend that you review the tips provided by the FTC's Consumer Information website, a valuable resource with some helpful tips on how to protect your information. Additional information is available at <https://www.consumer.ftc.gov/topics/privacy-identity-online-security>.

For more information, please visit [IdentityTheft.gov](https://www.identitytheft.gov) or call 1-877-ID-THEFT (877-438-4338). A copy of Identity Theft – A Recovery Plan, a comprehensive guide from the FTC to help you guard against and deal with identity theft, can be found on the FTC's website at https://www.consumer.ftc.gov/articles/pdf-0009_identitytheft_a_recovery_plan.pdf.

ATTORNEY GENERAL CONTACT INFORMATION

<p>ALABAMA Alabama Attorney General Steve Marshall (334) 242-7300 State House 11 S. Union St. Montgomery, AL 36130 consumerinterest@Alabamaag.gov</p>	<p>ALASKA Alaska Attorney General Kevin Clarkson (907) 465-3600 P.O. Box 110300 Diamond Courthouse Juneau, AK 99811-0300 attorney.general@alaska.gov</p>	<p>ARIZONA Arizona Attorney General Mark Brnovich (602) 542-4266 1275 W. Washington St. Phoenix, AZ 85007 aginfo@azag.gov</p>	<p>ARKANSAS Arkansas Attorney General Leslie Rutledge (800) 482-8982 200 Tower Bldg. 323 Center St. Little Rock, AR 72201-2610 oag@ArkansasAG.gov</p>	<p>CALIFORNIA California Attorney General Xavier Becerra (916) 445-9555 1300 I St., Ste. 1740 Sacramento, CA 95814 xavier.becerra@doj.ca.gov</p>
<p>COLORADO Colorado Attorney General Phil Weiser (303) 866-4500 1525 Sherman Street Denver, CO 80203 cora.request@coag.gov</p>	<p>CONNECTICUT Connecticut Attorney General William Tong (860) 808-5318 55 Elm St. Hartford, CT 06141-0120 attorney.general@ct.gov</p>	<p>DELAWARE Delaware Attorney General Kathy Jennings (302) 577-8338 Carvel State Office Bldg. 820 N. French St. Wilmington, DE 19801 attorney.general@state.de.us</p>	<p>DISTRICT OF COLOMBIA District of Columbia, Karl Racine (202) 724-1305 John A. Wilson Building 1350 PA Ave, NW Suite 409 Washington, DC 20009 karl.racine@dc.gov</p>	<p>FLORIDA Florida Attorney General Ashley Moody (850) 414-3300 The Capitol PL 01 Tallahassee, FL 32399-1050 ashley.moody@myfloridalegal.com</p>
<p>GEORGIA Georgia Attorney General Chris Carr (404) 656-3300 40 Capitol Square, SW Atlanta, GA 30334-1300 https://gbp.georgia.gov/contact-us</p>	<p>HAWAII Hawaii Attorney General Clare Connors (808) 586-1500 425 Queen St. Honolulu, HI 96813 hawaiiag@hawaii.gov</p>	<p>IDAHO Idaho Attorney General Lawrence Wasden (208) 334-2400 Statehouse Boise, ID 83720-1000 lawrence.wasden@ag.idaho.gov</p>	<p>ILLINOIS Illinois Attorney General Kwame Raoul (312) 814-3000 James R. Thompson Ctr. 100 W. Randolph St. Chicago, IL 60601 info@lisamadigan.org</p>	<p>INDIANA Indiana Attorney General Curtis Hill (317) 232-6201 Indiana Government Center South - 5th Floor 402 West Washington Street Indianapolis, IN 46204 https://www.in.gov/attorneygeneral/3063.htm</p>
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<p>OHIO Ohio Attorney General Dave Yost (614) 466-4320 State Office Tower 30 E. Broad St. Columbus, OH 43266-0410 https://www.ohioattorneygeneral.gov/About-AG/Contact</p>	<p>OKLAHOMA Oklahoma Attorney General Mike Hunter (405) 521-3921 State Capitol, Rm. 112 2300 N. Lincoln Blvd. Oklahoma City, OK 73105 questions@oag.ok.gov</p>	<p>OREGON Oregon Attorney General Ellen Rosenblum (503) 378-4732 Justice Bldg. 1162 Court St., NE Salem, OR 97301 ellen.rosenblum@doj.state.or.us</p>	<p>PENNSYLVANIA Pennsylvania Attorney General Josh Shapiro (717) 787-3391 1600 Strawberry Square Harrisburg, PA 17120 https://www.attorneygeneral.gov/contact/</p>	<p>PUERTO RICO Puerto Rico Secretary of Justice Domingo Emanuelli Hernández (787) 721-2900 PO Box 9020192 San Juan, PR, 00902-0192 ayudaalciudadano@justicia.pr.gov</p>
<p>RHODE ISLAND Rhode Island Attorney General Peter Neronha (401) 274-4400 150 S. Main St. Providence, RI 02903 https://riag.wufoo.com/forms/mlr8yoc71voil6i</p>	<p>SOUTH CAROLINA South Carolina Attorney General Alan Wilson (803) 734-3970 Rembert C. Dennis Office Bldg. P.O. Box 11549 Columbia, SC 29211-1549 http://www.scag.gov/contact-us/contact-us</p>	<p>SOUTH DAKOTA South Dakota Attorney General Jason Ravnsborg (605) 773-3215 500 E. Capitol Pierre, SD 57501-5070 https://atg.sd.gov/Contact.aspx</p>	<p>TENNESSEE Tennessee Attorney General Herbert Slatery (615) 741-5860 500 Charlotte Ave. Nashville, TN 37243 https://atg.sd.gov/Contact.aspx</p>	<p>TEXAS Texas Attorney General Ken Paxton (512) 463-2100 Capitol Station P.O. Box 12548 Austin, TX 78711-2548 https://texasattorneygeneral.gov/contact-form/</p>
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<p>WISCONSIN Wisconsin Attorney General Josh Kaul (608) 266-1221 State Capitol Ste. 114 E. P.O. Box 7857 Madison, WI 53707-7857 https://www.doj.state.wi.us/ag/contact</p>	<p>WYOMING Wyoming Attorney General Bridget Hill (307) 777-7841 State Capitol Bldg. Cheyenne, WY 82002 http://ag.wyo.gov/contact-us</p>			