



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

AUG 30 2019

CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302
Wayne, PA 19087

August 27, 2019

VIA U.S. MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Security Incident

Dear Attorney General Gordon J. MacDonald:

We represent Connecticut Laborers Fund Office (“CLFO”), 435 Captain Thomas Blvd., West Haven, CT 06516, and are writing to notify you of a recent incident that may affect the security of the personal information of approximately five (5) New Hampshire residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, CLFO does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data incident notification statute, or personal jurisdiction.

Nature of the Data Event

On May 9, 2019, CLFO became aware of unusual activity regarding an employee email account. CLFO immediately began an investigation to confirm the security of our network and to determine the nature and scope of this event. Working with an outside computer forensics investigator, on May 22, 2019, CLFO learned that an unauthorized actor logged into the employee email account for approximately forty-five (45) minutes on May 9, 2019.

CLFO next undertook a thorough and time-consuming review of the contents of the email messages which were determined to be at risk of unauthorized access in order to identify what personal information was stored within them. That review was recently completed. Once CLFO confirmed the individuals who were potentially impacted, CLFO worked to identify the best possible contact information for the impacted individuals so that CLFO could mail them written notice of this incident.

Office of the New Hampshire Attorney General
August 27, 2019
Page 2

The types of protected personal information impacted for New Hampshire residents included the following: name and Social Security Number.

Notice to New Hampshire Residents

On August 27, 2019, the CLFO began providing written notice of this incident to potentially impacted individuals, including approximately five (5) New Hampshire residents. Such notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken

CLFO is offering the potentially affected individuals complimentary access to 12 months of free credit monitoring and identity restoration services through Experian. Additionally, CLFO is providing potentially affected individuals with information on how to protect against identity theft and fraud, including information on how to contact the Federal Trade Commission and law enforcement to report any attempted or actual identity theft and fraud. In addition to providing notice of this incident to you, CLFO will be providing notice to other applicable state regulators and the United States Department of Health and Human Services.

CLFO has taken several immediate steps to protect against similar incidents in the future. Upon learning of this incident, CLFO immediately reset passwords for the impacted employee email account and has since changed all employee email account passwords. CLFO is continuing to monitor its systems to ensure they are secure. CLFO has taken additional steps to enhance data security protections to protect against similar incidents in the future, including implementing of additional technical safeguards such as multi-factor authentication and providing additional training and education to its employees.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security incident, please contact me at (267) 930-4801.

Very truly yours,



Alexander Walker of
MULLEN COUGHLIN LLC

ATW: JGI
Enclosure

EXHIBIT A



CONNECTICUT LABORERS' FUNDS

435 CAPTAIN THOMAS BOULEVARD, WEST HAVEN, CONNECTICUT 06516/5896

203-934-7991 telephone
1-800-922-3240 toll-free
203-933-1083 fax

Effective 1/1/17 new fax number
203-680-3847

Name

Address Line 1

Address Line 2

City, State, Zip

Date

Re: Notice of Data Security Incident

Dear [First Name] [Last Name]:

Connecticut Laborers Fund Office ("CLFO") is writing to notify you of an incident that may affect the security of some of your personal information. Although we are not aware of any attempted or actual misuse of personal information relating to this incident, we are providing you with information about the incident and steps you may take to protect your information from possible misuse, should you feel it is appropriate to do so.

What Happened? On May 9, 2019, CLFO became aware of unusual activity regarding an employee email account. We immediately began an investigation to confirm the security of our network and to determine the nature and scope of this event. Working with an outside computer forensics investigator, on May 22, 2019, we learned that an unauthorized actor logged into the employee email account for approximately forty-five (45) minutes on May 9, 2019.

We next undertook a thorough and time-consuming review of the contents of the email messages determined to be at risk of unauthorized access in order to identify what personal information was stored within them. That review was recently completed. Once CLFO confirmed the individuals who were potentially impacted, CLFO worked to identify the best possible contact information for the impacted individuals so that we could mail them written notice of this incident.

What Information Was Affected? The following types of your information were determined to be contained email messages or file attachments that were potentially subject to unauthorized access: [data elements] and your name.

What Are We Doing? We take this matter, and the security and privacy of information in our care, very seriously. In addition to conducting a diligent investigation, we are reviewing our policies and procedures and enhancing the security of our systems to mitigate the risk of future incidents. We are also providing you with notice of this incident, as well as information and resources you may use to better protect your personal information from potential misuse, should you feel it appropriate to do so. We will also be reporting this incident to appropriate regulatory authorities, including the US Department of Health and Human Services and certain state regulators.

As an added precaution, we are providing you with access to complimentary credit monitoring and identity restoration services. More information on these services and how to enroll may be found in the enclosed "Steps You Can Take to Protect Your Information."

What Can You Do? Although we are not aware of any actual or attempted identity theft as a result of this incident, we arranged to have Experian protect your identity for 12 months at no cost to you as an added precaution. Please review the instructions contained in the attached "Steps You Can Take to Protect Your Information" to enroll in and receive these services. CLFO will cover the cost of this service; however, you will need to enroll yourself in the credit monitoring service.

For More Information: We recognize that you may have questions not addressed in this letter. If you have additional questions, please call our dedicated assistance line at (203) 934-7791 or (800) 922-3240 (toll free), Monday through Friday, 8:00 a.m. to 4:30 p.m., ET.

We sincerely regret any inconvenience this incident may cause you. CLFO remains committed to safeguarding the information in our care and we will continue to take steps to ensure the security of our systems.

Sincerely,

Diane Klobukowski
Executive Director
Connecticut Laborers Fund Office

Steps You Can Take to Protect Your Information

Enroll in Credit Monitoring

[Activation code: **xxx**]

[insert credit monitoring enrollment instructions from Experian]

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to 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 reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You 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:

Experian PO Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	TransUnion P.O. Box 2000 Chester, PA 19016 1-888-909-8872 www.transunion.com/credit-freeze	Equifax PO Box 105788 Atlanta, GA 30348-5788 1-800-685-1111 www.equifax.com/personal/credit-report-services
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In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

<p>Experian P.O. Box 2002 Allen, TX 75013 1-888-397-3742 www.experian.com/fraud/center.htm</p>	<p>TransUnion P.O. Box 2000 Chester, PA 19016 1-800-680-7289 www.transunion.com/fraud-victim-resource/place-fraud-alert</p>	<p>Equifax P.O. Box 105069 Atlanta, GA 30348 1-888-766-0008 www.equifax.com/personal/credit-report-services</p>
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Although we have no reason to believe that your personal information has been used to file fraudulent tax returns, you can contact the IRS at www.irs.gov/Individuals/Identity-Protection for helpful information and guidance on steps you can take to address a fraudulent tax return filed in your name and what to do if you become the victim of such fraud. You can also visit www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft for more information.

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, 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.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that 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. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, www.ncdoj.gov.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us.

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.

For Rhode Island Residents: The Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 39 Rhode Island residents impacted by this incident.