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RECEIVED
AUG 23 2018
CONSUMER PROTECTION

August 23, 2018

File No. 28399.279

VIA ELECTRONIC MAIL

Attorney General Joseph Foster
Consumer Protection and Antitrust Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
E-Mail: DOJ-CPB@doj.nh.gov

Re: Notification of Data Security Incident

Dear Attorney General Foster:

This office represents Cortland Partners, located in Atlanta, Georgia. This letter is being sent pursuant to N.H. Stat. 359-C19; C:20; C:21 because on July 24, 2018, Cortland Partners learned that information belonging to one (1) New Hampshire resident may have been obtained without authorization. The information may have included names, Social Security numbers, password numbers, and financial account information.

On May 3, 2018, Cortland Partners discovered that information in an employee's email account was acquired without authorization. Cortland Partners immediately conducted an investigation to determine the scope of the incident, changed the password for the account, and engaged a digital forensic firm to assist with the matter. On July 24, 2018, after an extensive investigation, Cortland Partners determined which individuals' information was contained within the account. Cortland Partners has notified all affected individuals and is offering 12 months of credit and identity monitoring services at no cost.

Please contact me should you require additional information.

Very truly yours,

A handwritten signature in black ink that reads 'Sean B. Hoar'.

Sean B. Hoar of
LEWIS BRISBOIS BISGAARD & SMITH LLP

SBH:wrc
Enclosure: Consumer notification letter



cortlandpartners

<<Date>> (Format: Month Day, Year)

<<MemberFirstName>> <<MemberMiddleName>> <<MemberLastName>> <<Suffix>>
<<Address1>>
<<Address2>>
<<City>> <<State>> <<ZipCode>>

Subject: Notice of Data Security Incident

Dear <<MemberFirstName>> <<MemberLastName>>,

We are writing to inform you of a data security incident that may have affected your personal information. We take the privacy and security of your information very seriously. This is why we are contacting you, offering you identity monitoring services, and informing you about steps that can be taken to protect your personal information.

What happened? On May 3, 2018, we discovered that information in an email account was acquired without authorization. We immediately conducted an investigation to determine the scope of the incident, changed the password for the account, and engaged a digital forensic firm to assist with the matter. After an extensive investigation, which concluded on July 24, 2018, we identified your personal information in the account. We are informing you of the incident and encourage you to utilize the services referenced below to protect your personal information.

What Information Was Involved? The incident may have involved <<ClientDef1(names, [Social Security numbers] [passport information,] [and financial account information].)>>

What Are We Doing? As soon as we detected the incident, we took the steps referenced above. We are offering you identity monitoring services for 12 months at no cost to you and providing you additional information about steps you can take to protect your personal information. We have also enhanced our security measures, making it more difficult for similar incidents to occur in the future.

What You Can Do: You can follow the recommendations on a following page to protect your personal information. You can also enroll in identity monitoring at no cost to you for one year through Kroll. 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, Web Watcher, Fraud Consultation, and Identity Theft Restoration.

Visit <<IDMonitoringURL>> to activate and take advantage of your identity monitoring services.

You have until <<Date>> to activate your identity monitoring services.

Membership Number: <<Member ID>>

To receive credit services by mail instead of online, please call 1-???-???-?????. Additional information describing your services is included with this letter.

Take Advantage Of Your Identity Monitoring Services

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.

- **Web Watcher:** Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.
- **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.

Kroll's activation website is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

For more information.

If you have questions, please call 1-???-???-????, Monday through Friday from 8:00 a.m. to 5:00 p.m. Central Time. Please have your membership number ready.

We sincerely regret any inconvenience or concern that this matter may cause you, and remain dedicated to protecting your information.

Sincerely,

David M. Dickson Jr.
Chief Financial Officer
Cortland Partners

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, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may 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 print this form at <https://www.annualcreditreport.com/cra/requestformfinal.pdf>. You also can contact one of the following three national credit reporting agencies:

TransUnion	Experian	Equifax	Free Annual Report
P.O. Box 1000 Chester, PA 19016 1-877-322-8228 www.transunion.com	P.O. Box 9532 Allen, TX 75013 1-888-397-3742 www.experian.com	P.O. Box 105851 Atlanta, GA 30348 1-800-525-6285 www.equifax.com	P.O. Box 105281 Atlanta, GA 30348 1-877-322-8228 annualcreditreport.com

Fraud Alert: 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>.

Security Freeze: In some U.S. states, you have the right to put a security freeze on your credit file. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. If you request a security freeze from a consumer reporting agency there may be a fee up to \$10 to place, lift or remove the security freeze. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

Federal Trade Commission	Maryland Attorney General	North Carolina Attorney General	Rhode Island Attorney General
600 Pennsylvania Ave, NW Washington, DC 20580 consumer.ftc.gov , and www.ftc.gov/idtheft 1-877-438-4338	200 St. Paul Place Baltimore, MD 21202 oag.state.md.us 1-888-743-0023	9001 Mail Service Center Raleigh, NC 27699 ncdoj.gov 1-877-566-7226	150 South Main Street Providence, RI 02903 http://www.riag.ri.gov 401-274-4400

You also have certain rights under the Fair Credit Reporting Act (FCRA), including: to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information, as well as others. For more information about the FCRA, and your rights pursuant to the FCRA, please visit http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.