

RECEIVED

SEP 26 2019

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CONSUMER PROTECTION

September 23, 2019

**VIA FIRST CLASS MAIL**

Consumer Protection Bureau  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

Re: Notice of Data Security Incident

To Whom It May Concern:

My firm represents Covestro LLC. I write to inform you of an incident involving an accidental disclosure of personal information.

On or about April 1, 2019, a spreadsheet was accidentally saved in a location where it could be accessible only by Covestro employees and contractors within Covestro's U.S. internal intranet system, CovestroNet. The spreadsheet contained personal information concerning certain Covestro employees and, in a few cases, their spouses or domestic partners. Specifically, the spreadsheet included the first and last name, home address, employee identification number, Social Security Number, and date of birth of employees, and in some cases their spouses or domestic partners, who were eligible to be enrolled in one of Covestro's wellness programs. The spreadsheet could be viewed internally by other employees if an individual happened to accidentally locate it through an internal intranet search.

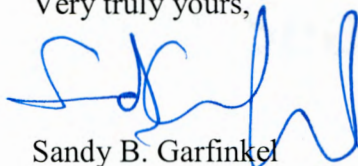
Covestro learned about the spreadsheet and the fact that it was accessible internally by employees on July 17, 2019, after an employee conducted a search and the spreadsheet appeared as one of the search results while the employee was looking for other information on CovestroNet. Covestro immediately removed the document so it was no longer searchable through CovestroNet. Covestro then promptly conducted an investigation concerning the incident. The investigation revealed no evidence of any intentional misconduct concerning the accessibility of the spreadsheet, nor did Covestro find any evidence that the information on the spreadsheet was viewed by anyone not authorized to see it, with the exception of the one employee who was able to access the document but did not save, print, download, or share the information with anyone else. Further, Covestro found no evidence that any personal information from the spreadsheet has been acquired by anyone outside of the company, or has been or could be used to commit fraud or identity theft. Despite the foregoing, Covestro is notifying all potentially affected individuals of this incident.

As stated above, Covestro found no evidence that the personal information on the spreadsheet has been shared outside of the company or has been misused. Regardless, out of an abundance of caution, Covestro is reviewing its policies and procedures concerning the handling of employee personal information as well as instituting additional internal controls for those responsible for such documents. Also, employees who have job responsibilities for such documents have been reminded of the classification and security requirements associated with handling such information. Covestro is also offering affected individuals one (1) year of identity protection services at no charge.

Based upon its investigation, Covestro will provide direct notification by letter to eleven (11) affected individuals who are known to reside in New Hampshire via US Mail on or about September 23, 2019. A copy of the notice to be sent to these residents is attached hereto.


If you have any further questions about the incident, do not hesitate to contact me.

Very truly yours,




Sandy B. Garfinkel

*Enclosure*



C/O ID Experts  
PO Box 4219  
Everett WA 98204

ENDORSE



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ADDRESS1  
ADDRESS2  
CSZ  
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CODE 2D

BREAK

To Enroll, Please Call:  
(833) 959-1352  
Or Visit:  
<https://app.myidcare.com/account-creation/protect>  
Enrollment Code: <<XXXXXXXXXX>>

September 23, 2019

**NOTICE OF DATA SECURITY INCIDENT**

Dear NAME,

Covestro LLC is writing to inform you of an incident that may affect the security of your personal information. Through this letter, we are providing you with details regarding the incident and access to resources that could help you protect yourself against the possibility of misuse of your personal information, should you feel it appropriate to do so.

The privacy and protection of our employees', former employees' and their families' information is a matter we take very seriously. We apologize for any concern or inconvenience that may be caused by this incident and we recommend that you closely review this letter for steps that you may take to further protect yourself against any potential misuse of your information.

**What happened?**

On or about April 1, 2019, a spreadsheet was accidentally saved in a location that could be accessible through Covestro's U.S. internal intranet system, CovestroNet. That spreadsheet included personal information of Covestro employees and, in a few cases, their spouses or domestic partners, who were eligible for enrollment in the company's myTotal Wellbeing program. Those with U.S. access to CovestroNet could view the spreadsheet if they happened to accidentally locate it through a search.

On July 17, 2019, Covestro learned about the spreadsheet and the fact that it was accessible by those with U.S. access to CovestroNet, after an employee conducted a search and the spreadsheet appeared as one of the search results. Covestro immediately removed the document so it was no longer searchable.

Then, Covestro promptly conducted an investigation concerning the incident. The investigation revealed no evidence of any intentional misconduct concerning the accessibility of the spreadsheet, nor did Covestro find any evidence that the information on the spreadsheet was viewed by anyone not authorized to see it, with the exception of the one employee who was able to access the document but did not save, print, download or share the information with anyone else. Further, Covestro found no evidence that any personal information from the spreadsheet has been acquired by anyone outside of the company or has been or could be used to commit fraud or identity theft.

Despite the foregoing, out of an abundance of caution, Covestro is notifying all potentially affected employees, former employees and employee spouses or domestic partners of this incident so that they may take measures to protect themselves from any possible misuse of their information.

**What information was involved?**

The spreadsheet included first and last names, home address, employee identification number, Social Security number and the date of birth of employees, and in some cases their spouses or domestic partners. If your spouse's or domestic partner's information was included, they will also receive a notice from Covestro.

**What are we doing?**

As stated above, Covestro found no evidence that the personal information on the spreadsheet has been shared outside of the company or has been misused. Regardless, out of an abundance of caution, Covestro is reviewing its policies and procedures concerning the handling of employee personal information, as well as instituting additional internal controls for those responsible for such documents. In addition, employees who have job responsibilities for such documents have been reminded of the classification and security requirements associated with handling such information.

Covestro is also offering each affected individual complimentary identity theft protection services through ID Experts®. ID Experts will provide MyIDCare™ services, which includes credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. For more information on identity theft prevention and MyIDCare, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.

**What you can do?**

You should remain vigilant for incidents of fraud and identity theft by regularly reviewing your account statements and monitoring free credit reports for any unauthorized activity. If you discover any suspicious or unusual activity on your accounts, be sure to report it immediately to your financial institutions, as major credit card companies have rules that restrict them from requiring you to pay for fraudulent charges if they are reported in a timely fashion.

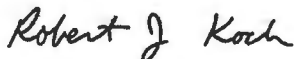
You may contact ID Experts with any questions, and you can enroll in the MyIDCare services which we are offering to you free of charge, by calling 1-833-959-1352 or going to <https://app.myidcare.com/account-creation/protect> and using the Enrollment Code provided at the top of this letter. MyIDCare experts are available Monday through Friday from 9 a.m. - 9 p.m. Eastern Time. Please note the deadline to enroll is December 20, 2019.

**For more information**

We understand that you may have questions about this incident that are not addressed in this letter. A confidential, toll-free hotline is available to assist you with questions regarding this incident, the free services we are making available, and steps you can take to protect yourself against identity theft and fraud. We apologize for any inconvenience caused by this incident.

If you have any questions regarding this incident or if you desire further information or assistance, please contact ID Experts toll free at 1-833-959-1352.

Sincerely,



Robert J. Koch  
Senior Counsel and Data Privacy Officer  
Covestro LLC



## ADDITIONAL RESOURCES

### **Contact information for the three nationwide credit reporting agencies is:**

**Equifax**, PO Box 740241, Atlanta, GA 30374, [www.equifax.com](http://www.equifax.com), 1-800-685-1111

**Experian**, PO Box 2104, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742

**TransUnion**, PO Box 2000, Chester, PA 19022, [www.transunion.com](http://www.transunion.com), 1-800-888-4213

**Free Credit Report.** It is recommended that you remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring your credit report for unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting agencies.

To order your annual free credit report please visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's ("FTC") website at [www.consumer.ftc.gov](http://www.consumer.ftc.gov)) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

**For Colorado, Georgia, Maine, Massachusetts, New Jersey and Vermont residents:** You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

**Fraud Alert.** You may place a fraud alert in your file by calling one of the three nationwide credit reporting agencies above. A fraud alert tells creditors to follow certain procedures, including contacting you before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit.

**Security Freeze.** You have the ability to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent. To place a security freeze on your credit report, you may be able to use an online process, an automated telephone line, or a written request to any of the three credit reporting agencies listed above. 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.

**Federal Trade Commission and State Attorneys General Offices.** If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your home state. You may also contact these agencies for information on how to prevent or avoid identity theft.

You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, [www.ftc.gov/bcp/edu/microsites/idtheft/](http://www.ftc.gov/bcp/edu/microsites/idtheft/), 1-877-IDTHEFT (438-4338).

**California Residents:** Visit the California Office of Privacy Protection (<http://www.ca.gov/Privacy>) for additional information on protection against identity theft.

**Massachusetts Residents:** There is no charge for requesting a security freeze, and you have the right to obtain a copy of a police report concerning any fraud or identity theft committed using your personal information.

**North Carolina Residents:** You can obtain information about preventing identity theft from the Office of the Attorney General of North Carolina, 9001 Mail Service Center Raleigh, NC 27699-9001, [www.ncdoj.gov](http://www.ncdoj.gov), Telephone: 1-919-716-6400.