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August 1, 2019

RECEIVED

AUG 02 2019

CONSUMER PROTECTION

Via overnight mail

Attorney General Gordon MacDonald
New Hampshire Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Incident Notification

Dear Attorney General MacDonald:

We are writing on behalf of our client, Czero, Inc. ("Czero"), to notify you of a security incident.

Czero recently concluded its investigation into an email phishing campaign that targeted some its employees. Upon learning of the incident, Czero immediately took steps to secure the account and launched an internal investigation. The investigation determined that an unauthorized person accessed some email accounts between April 2, 2019 and April 12, 2019. The investigation was not able to determine which emails and attachments were viewed by the unauthorized person(s). Czero therefore conducted a thorough review of the contents of the email account involved and, on June 7, 2019, determined that an email or attachment contained the Social Security number and health insurance information of one New Hampshire resident.

On August 1, 2019, Czero will mail a notification letter to one New Hampshire resident in accordance with N.H. Rev. Stat. § 359-C:20, via United States First-Class mail, in substantially the same form as the enclosed letter.¹ Notice is being provided to the individual as soon as possible and without delay. Czero is offering the New Hampshire resident a complimentary one-year membership in credit monitoring and identity theft protection services through Experian and is providing a telephone number to call with any questions about the incident.

¹ This notice does not waive Czero's objection that New Hampshire lacks personal jurisdiction over Czero related to this incident.

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Czero takes the security of personal information seriously. To further enhance its security measures, Czero has re-educated employees regarding phishing emails and enhanced its existing security measures.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in cursive script that reads "Anthony P. Valach".

Anthony P. Valach
Counsel

Enclosure



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

<<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

Dear <<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>,

Czero, Inc. ("Czero") recognizes the importance of protecting the privacy of personal information. We are writing to inform you of a recent security incident that may have involved that information. This letter explains the incident, measures we have taken, and steps you can take in response.

We recently concluded our investigation into an email phishing campaign that targeted several of our employees. Upon learning of the incident, we immediately took steps to secure the accounts, launched an internal investigation, and a cyber security firm was engaged to assist us. Our investigation determined that an unauthorized person accessed some employee email accounts between April 2, 2019 and April 12, 2019. The investigation was not able to determine which emails and attachments were viewed by the unauthorized person(s). We therefore conducted a thorough review of the contents of the email accounts involved and, on June 7, 2019, determined that an email or attachment contained some of your personal information, including your <<ClientDef1(impacted data)>><<ClientDef2(impacted data)>>.

Although, to date, we have no indication that any of your information was misused, we are nonetheless informing you of the incident, and we want to assure you that we take it very seriously. We encourage you to remain vigilant by reviewing your account statements and credit reports for any unauthorized activity. As a precaution, we have arranged for you to receive a complimentary one-year membership to Experian's® IdentityWorksSM credit monitoring service. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorksSM is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorksSM, including instructions on how to activate your complimentary one-year membership, as well as some additional steps you can take in response, please see the additional information provided in this letter.

We take the security of your personal information very seriously. To help prevent a similar incident from occurring in the future, we have re-educated employees regarding phishing emails and enhanced existing security measures.

If you have any questions, please call 1-833-680-7832, Monday through Friday, from 7:00 a.m. to 4:30 p.m. Mountain Time.

Sincerely,

Guy Babbitt
CEO

To help protect your identity, we are offering a **complimentary** one-year membership of Experian's® IdentityWorksSM. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: <<ClientDef3(enrollment end date)>>** (Your code will not work after this date.)
- Visit the **Experian IdentityWorks website** to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your **activation code: <<Member ID>>**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 1-877-890-9332 by **<<ClientDef3(enrollment end date)>>**. Be prepared to provide engagement number **<<ClientDef4(engagement #)>>** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12 MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at 1-877-890-9332. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for one year from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Additional Steps You Can Take

Regardless of whether you choose to take advantage of this complimentary credit monitoring service, we remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any 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 companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111

Experian, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742

TransUnion, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

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 state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

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

Fraud Alerts: There are two types of fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies.

Credit Freezes: You have the right to put a credit freeze, also known as a security 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 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.

There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

Experian Security Freeze, PO Box 9554, Allen, TX 75013, www.experian.com

TransUnion Security Freeze, PO Box 2000, Chester, PA 19016, www.transunion.com

Equifax Security Freeze, PO Box 105788, Atlanta, GA 30348, www.equifax.com

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 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 the police report, investigative report, or complaint to a law enforcement agency concerning identity theft

The credit reporting agencies have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five business days and provide you with a unique personal identification number ("PIN") or password or both that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, or to lift a security freeze for a specified period of time, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to the credit reporting agencies and include proper identification (name, address, and Social Security number) and the PIN or password provided to you when you placed the security freeze as well as the identity of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to each of the three credit bureaus and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to remove the security freeze.