

**WILSON
SONSINI**

RECEIVED

JUN 15 2020

CONSUMER PROTECTION

Wilson Sonsini Goodrich & Rosati
Professional Corporation
1700 K Street NW
Fifth Floor
Washington, D.C. 20006-3817
O: 202.973.8800
F: 202.973.8899

June 10, 2020

VIA US MAIL

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

Re: Notice of Data Security Incident

Dear Attorney General MacDonald,

We are writing on behalf of our client, Digital Management, LLC (“DMI”), an IT professional services contractor, to inform you of a recent event that may affect the security of personal information of five New Hampshire residents who are current or former employees of DMI and certain of its subsidiaries.

DMI recently discovered ransomware on some of its systems and immediately took all systems offline, retained third-party cybersecurity experts to aid in its investigation, and worked to safely restore systems in a manner that protected the security of information on its systems. DMI has contacted the Federal Bureau of Investigation and other appropriate authorities and has and will continue to cooperate in any law enforcement investigation.

DMI’s investigation identified evidence of unauthorized access to its corporate systems supporting US and Canadian operations. DMI does not know if sensitive personal information held on its affected systems was in fact accessed.

On or about June 10, 2020, pursuant to N.H. Rev. Stat. Ann. § 359-C:20, DMI will begin mailing notification letters to New Hampshire residents, which will include an offer of complimentary credit monitoring and fraud protection services for a period of one year. A copy of the template letter is enclosed.

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

Sincerely,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

Allison J. Bender

Enclosure



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

June 10, 2020

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SAMPLE A SAMPLE - L01 CALIFORNIA
APT 123
123 ANY ST
ANYTOWN, US 12345-6789



Re: Notice of Data Breach

Dear Sample,

We recently informed you of an incident affecting DMI and are sending this letter to provide you with an update regarding your personal information. Please read this letter carefully and contact us with any questions.

WHAT HAPPENED

On April 25, 2020, we discovered ransomware on some of our systems. We immediately took all systems offline, retained third-party cybersecurity experts to aid in our investigation, contacted law enforcement, and worked to safely restore systems in a manner that protected the security of information on our systems.

Our investigation identified evidence of unauthorized access to our corporate systems supporting US and Canadian operations from approximately March 6, 2020 until approximately April 25, 2020. We do not know if sensitive personal information held on our affected systems was accessed, which is why out of an abundance of caution we are informing you of this matter.

WHAT INFORMATION WAS INVOLVED

The information contained in the compromised systems may include: name, personal email address, company email address and hashed password, employee ID number, passport information, US birth certificate, US naturalization certificate, driver's license number, bank account information, Social Security number, date of birth, mailing address, work location, compensation and benefit information, emergency contact information, and dates of employment.

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WHAT WE ARE DOING

As a precautionary measure, we are offering you free credit monitoring and resolution of identity theft services through Experian's® IdentityWorksSM for a period of one year. This product provides you with daily monitoring of your credit report from Experian, internet surveillance, and identity restoration assistance. To activate your membership and start enrollment in the complimentary monitoring service, please follow the steps below:

- Ensure that you **enroll by: 9/30/2020** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code: ABCDEFGHI**

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 866-578-5413 by **9/30/2020**. Please be prepared to provide engagement number **ENGAGE#** as proof of eligibility for the identity restoration services by Experian.

WHAT YOU CAN DO

In addition to signing up for the complimentary monitoring service, to protect yourself from possible identity theft, consider placing a fraud alert on your credit file. A fraud alert helps protect you against the possibility of an identity thief opening new credit accounts in your name. When a merchant checks the credit history of someone applying for credit, the merchant gets a notice that the applicant may be the victim of identity theft. The alert notifies the merchant to take steps to verify the identity of the applicant. You can place a fraud alert on your credit report by calling any of the toll-free numbers of the credit reporting agencies provided below. You will reach an automated telephone system that allows you to flag your file with a fraud alert at all three credit bureaus.

You have the right to place a security freeze on your credit report, which will prohibit a credit 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 placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit, mortgages, employment, housing, or other services.

To place a fraud alert or security freeze on your credit file, contact each credit reporting agency directly:

Equifax®

PO Box 740241
Atlanta, GA 30374-0241
1-800-685-1111
www.equifax.com

Experian®

PO Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion®

PO Box 1000
Chester, PA 19016
1-800-680-7289
www.transunion.com

When you place any type of fraud alert on your credit file, the credit reporting agencies will send you a free copy of your credit report. Look for accounts that are not yours, debts you do not owe, or any other inaccuracies (e.g., wrong social security number or home address). If you find an error, contact the credit reporting agency directly. By law, that credit reporting agency must investigate and respond.

The Federal Trade Commission (“FTC”) also recommends regularly reviewing statements from your accounts and periodically obtaining your credit report from one or more national credit reporting agencies. You may obtain a free copy of your credit report online at www.annualcreditreport.com or by calling toll-free 1-877-322-8228. (Hearing impaired consumers can access their TDD service at 1-877-730-4204.) The FTC provides an identity theft hotline: 1-877-438-4338; TTY: 1-866-653-4261. The FTC also provides information online at www.ftc.gov/idtheft. For Mail: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act (“FCRA”), 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 FCRA: (i) the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; (ii) the consumer reporting agencies may not report outdated negative information; (iii) access to your file is limited; (iv) you must give consent for credit reports to be provided to your employees; (v) you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; (vi) and you may seek damages from a violator. You may have additional rights under the FCRA not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the FCRA. We encourage you to review your rights pursuant to the FCRA by visiting https://files.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 Attorney General can be contacted at 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov. You also have the right to file and obtain a copy of a police report of the incident.

For any accounts you maintain, security experts recommend implementing multi-factor authentication, where offered. If you are a participant in the DMI 401(k) plan administered by Fidelity, for example, you can implement multi-factor authentication through the Fidelity account settings. If you have any questions about your DMI 401(k) account, please contact Fidelity at 1-800-835-5097 or log into your account to make changes at www.401k.com.

ADDITIONAL DETAILS REGARDING THE EXPERIAN IDENTITYWORKS PRODUCT

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 file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents 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.

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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 866-578-5413. 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.

We deeply regret that this incident happened and any concern that this situation has caused. This notification was not delayed due to a law enforcement investigation. We take this situation seriously and have taken and continue to take steps designed to prevent this type of incident from happening in the future.

FOR MORE INFORMATION

If you have questions or concerns, please contact the dedicated call center for our personnel provided by Experian at 866-578-5413 between the hours of 9:00 AM to 11:00 PM EDT, Monday through Friday, and 11:00 AM to 8:00 PM EDT, Saturday and Sunday.

Sincerely,
Molly Mays
Vice President of Global Employee Resources and Talent Acquisition

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

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.