

RECEIVED

AUG 27 2018

CONSUMER PROTECTION



NH Department of Justice
Gordon J. MacDonald, Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notification Regarding Unauthorized Acquisition of Personal Information

Dear Attorney General MacDonald:

I write on behalf of Dorian Business Systems, LLC to notify you of an issue that may have involved certain personal information of New Hampshire residents. Dorian provides music administration and program management services through a cloud-based solution, Charms Office Assistant.

What happened? On July 17, 2018, someone reported to us that they found a text file posted to an unrelated website that appeared to belong to Charms, and that appeared to contain certain personal information (the “Charms Table”). We immediately investigated and, while our investigation is ongoing, it appears that an unknown actor had likely exploited a vulnerability in certain Charms webpages, queried the backend database and extracted information. It appears the actor then compiled that information into a text file and posted it to the website.

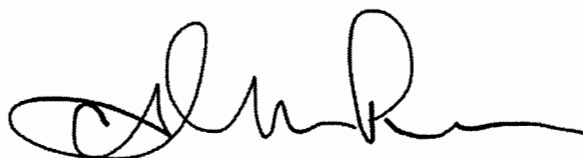
What information was impacted? The Charms Table contained what appears to be the name, address, phone number, e-mail address, driver’s license number, and date of birth for 3 New Hampshire residents.

What we have done? We issued a takedown notice to the website and the file was taken down. We addressed the vulnerability and have been taking other steps to further enhance the security of our systems. We reported the matter to law enforcement and are cooperating in the investigation.

In addition, we prepared the attached letter to the New Hampshire residents described above and are providing those New Hampshire residents a complimentary membership for twenty-four months in AllClear Identity Protection Services.

Dorian takes the privacy and security of personal information very seriously. If you have any questions about this event, please contact me by email at cpiper@connexeo.com; by phone at 952-955-4822; or by mail at 9201 East Bloomington Freeway, Suite RR, Bloomington, MN 55420.

Sincerely,

A handwritten signature in black ink, appearing to read 'Charlie Piper', with a long horizontal flourish extending to the right.

Charlie Piper
Chief Executive Officer



CHARMS
OFFICE ASSISTANT

Processing Center • P.O. BOX 141578 • Austin, TX 78714



00001
JOHN Q. SAMPLE
1234 MAIN STREET
ANYTOWN US 12345-6789

August 24, 2018

Re: Notice of Data Breach

Dear John Sample,

We write on behalf of Dorian Business Systems, LLC, to inform you of an issue that involved some of your information. We are contacting you not only to inform you about the situation and provide details of what occurred, but also to provide you with additional information contained in the attachments to this letter, which we hope you will find useful.

What happened? On July 17, 2018, we became aware that information from a database table used by our Charms Office Assistant had been found on a third-party website. Upon learning of this, we investigated and determined that an unauthorized party had likely taken the information from our systems and posted it to the website without our knowledge or permission. We immediately took steps to block any further unauthorized access to our systems, and we instructed the third-party website to take down the content. We have reported the matter to law enforcement and are cooperating in their investigation.

What information was affected? The information affected involved a database table used by our Charms Office Assistant. That table may have contained your name, address, phone number, e-mail address, driver's license number and date of birth.

What we are doing. In addition to the steps described in this letter, we are taking several steps to further strengthen and enhance our information security controls, training, and procedures, including working with multiple independent third-party security consultants.

As an added precaution, we have arranged to have AllClear ID protect your identity for 24 months at no cost to you. These services are being offered in compliance with certain state regulatory requirements and requests, and otherwise as a courtesy, but this offer is not intended to suggest that you are at any substantial risk of harm. The following identity protection services start on the date of this notice and you can use them at any time during the next 24 months.

AllClear Identity Repair: This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-803-1486 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

AllClear Fraud Alerts with Credit Monitoring: This service offers the ability to set, renew, and remove 90-day fraud alerts on your credit file to help protect you from credit fraud. In addition, it provides credit monitoring services, a once annual credit score and credit report, and a \$1 million identity theft insurance policy. To enroll in this service, you will need to provide your personal information to AllClear ID. You may sign up online at enroll.allclearid.com or by phone by calling 1-855-803-1486 using the following redemption code: Redemption Code.



01-03-1-00

Please note: Following enrollment, additional steps are required by you in order to activate your phone alerts and fraud alerts, and to pull your credit score and credit file. Additional steps may also be required in order to activate your monitoring options.

What you can do. If you would like to enroll in the membership described above, please see the attached instructions. In addition, attached is an "Information about Identity Theft Protection" guide, which describes recommendations by the Federal Trade Commission regarding identity theft protection, as well as how to place a fraud alert or a security freeze on your credit file.

Your trust is very important to us, and we take this matter very seriously. We sincerely regret any concern you may have about this situation and if you have any questions regarding the content of this letter or the information in the attached exhibits, please contact us at 1-855-803-1486 between the hours of 8:00 a.m. and 8:00 p.m. Central Time, Monday through Saturday.

Sincerely,

The Customer Service Team at Dorian

Information about Identity Theft Protection

You may obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

Equifax, P.O. Box 740241, Atlanta, Georgia 30374-0241, 1-800-685-1111, www.equifax.com
Experian, P.O. Box 9532, Allen, TX 75013, 1-888-397-3742, www.experian.com
TransUnion, P.O. Box 1000, Chester, PA 19022, 1-877-322-8228, www.transunion.com

Vigilance with respect to reviewing account statements and credit reports may help reduce fraud or identity theft. Any suspicious activity or suspected identity theft may be reported to the proper law enforcement authorities, including local law enforcement, your state's attorney general, and/or the Federal Trade Commission ("FTC"). You may contact the FTC or your state's regulatory authority to obtain additional information about avoiding and protection against identity theft: Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, D.C. 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft.

Fraud Alerts: There are two types of fraud alerts that 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 at least 90 days. 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 at the toll-free numbers listed below:

Equifax
877-478-7625

Experian
888-397-3742

TransUnion
800-680-7289

Credit Freezes: You may have the right to put a credit freeze on your credit file so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit 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 credit freeze may delay your ability to obtain credit. In addition, you may incur fees to place, lift, and/or remove a credit freeze. Credit freeze laws vary from state to state. The cost of placing, temporarily lifting, and removing a credit freeze also varies by state, generally \$5 to \$20 per action at each credit reporting company. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information.

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

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

TransUnion (FVAD)
P.O. Box 2000
Chester, PA 19022-2000
freeze.transunion.com

You can obtain more information about fraud alerts and credit freezes by contacting the FTC or one of the national credit reporting agencies listed above.

Additional Information: You can further educate yourself regarding identity theft, security freezes, fraud alerts, and the steps you can take to protect yourself against identity theft and fraud by contacting 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); and TTY: 1-866-653-4261. The Federal Trade Commission encourages those who discover that their information has been misused to file a complaint with them. Instances of known or suspected identity theft should be reported to law enforcement, the Federal Trade Commission, and your state Attorney General. This notice has not been delayed by law enforcement.

For Iowa residents, the Iowa Attorney General's Office can be contacted by mail at 1305 E. Walnut Street, Des Moines, IA 50319; by phone at (515) 281-5164; and online at <http://www.iowaattorneygeneral.gov/>

For Maryland residents, the Attorney General's Office can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and www.oag.state.md.us

For North Carolina residents, the Attorney General's Office can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at www.ncdoj.gov



AllClear Identity Repair Terms of Use

If you become a victim of fraud using your personal information without authorization, AllClear ID will help recover your financial losses and restore your identity. Benefits include:

- 24 months of coverage with no enrollment required.
- No cost to you — ever. AllClear Identity Repair is paid for by the participating Company.

Services Provided

If you suspect identity theft, simply call AllClear ID to file a claim. AllClear ID will provide appropriate and necessary remediation services (“Services”) to help restore the compromised accounts and your identity to the state prior to the incident of fraud. Services are determined at the sole discretion of AllClear ID and are subject to the terms and conditions found on the AllClear ID website. AllClear Identity Repair is not an insurance policy, and AllClear ID will not make payments or reimbursements to you for any financial loss, liabilities or expenses you incur.

Coverage Period

Service is automatically available to you with no enrollment required for 24 months from the date of the breach incident notification you received from Company (the “Coverage Period”). Fraud Events (each, an “Event”) that were discovered prior to your Coverage Period are not covered by AllClear Identity Repair services.

Eligibility Requirements

To be eligible for Services under AllClear Identity Repair coverage, you must fully comply, without limitations, with your obligations under the terms herein, you must be a citizen or legal resident eighteen (18) years of age or older, and have a valid U.S. Social Security number. Minors under eighteen (18) years of age may be eligible, but must be sponsored by a parent or guardian. The Services cover only you and your personal financial and medical accounts that are directly associated with your valid U.S. Social Security number, including but not limited to credit card, bank, or other financial accounts and/or medical accounts.

How to File a Claim

If you become a victim of fraud covered by the AllClear Identity Repair services, you must:

- Notify AllClear ID by calling 1.855.434.8077 to report the fraud prior to expiration of your Coverage Period;
- Provide proof of eligibility for AllClear Identity Repair by providing the redemption code on the notification letter you received from the sponsor Company;
- Fully cooperate and be truthful with AllClear ID about the Event and agree to execute any documents AllClear ID may reasonably require; and
- Fully cooperate with AllClear ID in any remediation process, including, but not limited to, providing AllClear ID with copies of all available investigation files or reports from any institution, including, but not limited to, credit institutions or law enforcement agencies, relating to the alleged theft.

Coverage under AllClear Identity Repair Does Not Apply to the Following:

Any expense, damage or loss:

- Due to
 - o Any transactions on your financial accounts made by authorized users, even if acting without your knowledge, or
 - o Any act of theft, deceit, collusion, dishonesty or criminal act by you or any person acting in concert with you, or by any of your authorized representatives, whether acting alone or in collusion with you or others (collectively, your “Misrepresentation”);
- Incurred by you from an Event that did not occur during your coverage period; or
- In connection with an Event that you fail to report to AllClear ID prior to the expiration of your AllClear Identity Repair coverage period.

Other Exclusions:

- AllClear ID will not pay or be obligated for any costs or expenses other than as described herein, including without limitation fees of any service providers not retained by AllClear ID; AllClear ID reserves the right to investigate any asserted claim to determine its validity.
- AllClear ID is not an insurance company, and AllClear Identity Repair is not an insurance policy; AllClear ID will not make payments or reimbursements to you for any loss or liability you may incur.
- AllClear ID is not a credit repair organization, is not a credit counseling service, and does not promise to help you improve your credit history or rating beyond resolving incidents of fraud.
- AllClear ID reserves the right to reasonably investigate any asserted claim to determine its validity. All recipients of AllClear Identity Repair coverage are expected to protect their personal information in a reasonable way at all times. Accordingly, recipients will not deliberately or recklessly disclose or publish their Social Security number or any other personal information to those who would reasonably be expected to improperly use or disclose that Personal Information.

Opt-out Policy

If for any reason you wish to have your information removed from the eligibility database for AllClear Identity Repair, please contact AllClear ID:

E-mail support@allclearid.com	Mail AllClear ID, Inc. 823 Congress Avenue Suite 300 Austin, Texas 78701	Phone 1.855.434.8077
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