

## CONFIDENTIAL TREATMENT REQUESTED

December 9, 2020

### BY MAIL

New Hampshire Department of Justice  
Gordon J. MacDonald, Attorney General  
33 Capitol Street  
Concord, NH 03301  
T: 603-271-3658

Re: Investnet Financial Technologies, Inc. Notification of Incident

Dear Attorney General MacDonald:

In accordance with New Hampshire Statute § 359-C:20, we write on behalf of our client, Investnet Financial Technologies, Inc. ("Investnet"), to inform you of a data security incident involving the personal information of 5 New Hampshire residents.

On August 4, 2020, Investnet became aware of suspicious activity affecting its email platform. Investnet promptly commenced an investigation, engaged a leading cybersecurity firm to assist in assessing the scope of the potential incident, and took steps to terminate the potential unauthorized access. In early November 2020, Investnet determined that some personal information may have been among data that was subject to unauthorized access.

Investnet's investigation found that the unauthorized access appears to have been limited in scope, but was unable to determine whether any personal information was actually accessed or viewed. The information involved may have included one or more of the following: a Social Security number, individual taxpayer identification number, passport number, a driver's license number or a username or unique identifier in combination with a password, access code, or security question and answer that would permit access to an online account. Investnet is distributing notification letters to all impacted individuals on December 9, 2020. A copy of this notice is attached.

Investnet takes the security of personal information in its care seriously. Investnet engaged a leading cybersecurity firm to support its investigation and is taking additional security steps to help prevent future incidents. Further, as a precautionary measure, Investnet is offering two years of free credit monitoring and identity theft protection services to individuals impacted by the incident. Investnet also has provided individuals with information about steps they can take to protect themselves from fraud.

Should you have any questions or require further information, please do not hesitate to contact me.

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CONSUMER PROTECTION

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Mayer Brown LLP

New Hampshire Department of Justice

December 9, 2020

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Sincerely,

A handwritten signature in black ink, appearing to read "D. Simon". The signature is stylized with a large, sweeping initial "D" and a cursive "Simon".

David Simon

Partner



Investnet Financial Technologies, Inc.  
35 East Wacker Drive, 24th Floor  
Chicago, IL 60601

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

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country >>

**Notice of Data Breach**

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>,

We are writing to tell you about a data security incident that may have affected some of your personal information. We take the protection and proper use of personal information seriously. For this reason, we are contacting you directly to explain the circumstances of the incident.

**What happened?**

On August 4, 2020, we became aware of suspicious activity affecting our email platform. We promptly commenced an investigation, engaged a leading cybersecurity firm to assist in assessing the scope of the potential incident, and took steps to terminate the potential unauthorized access. In early November 2020, we determined that some personal information may have been among data that was subject to unauthorized access. This unauthorized access appears to have been limited in scope. The investigation was unable to determine whether any personal information was actually accessed or viewed. But, at this time, we have no knowledge that any of your information has been used improperly.

**What information was involved?**

The information involved may have included one or more of the following: a Social Security number, individual taxpayer identification number, passport number, a driver's license number, or a username or unique identifier in combination with a password, access code, or security question and answer that would permit access to an online account.

**What we are doing?**

We take the security of personal information in our care seriously. We have engaged a leading cybersecurity firm to support our investigation and are taking additional security steps to help prevent future incidents.

We have secured the services of Kroll to provide identity monitoring at no cost to you for two years. 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, a Current Credit Report, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

**What you can do.**

We understand you may have concerns about this incident. We want to make you aware of steps you may take to guard against identity theft or fraud. Please review the enclosed "Additional Resources" section included with this letter. This section describes additional steps you can take to help protect yourself, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file.

To start monitoring your personal information, please follow the steps below:

Visit <https://enroll.idheadquarters.com> to activate and take advantage of your identity monitoring services.

You have until **March 7, 2021** to activate your identity monitoring services.

Membership Number: <<Member ID>>

**For more information.**

If you have questions or need assistance with identity restoration please contact Kroll at 1-833-971-3258 by March 7, 2021, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays. Please have your membership number ready.

We sincerely regret this incident and any inconvenience or concern it may cause you. Should you have questions or concerns regarding this matter, please do not hesitate to call 1-833-971-3258.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Marr". The signature is fluid and cursive, with the first name "Patrick" and last name "Marr" clearly distinguishable.

Patrick Marr  
Deputy General Counsel

## ADDITIONAL RESOURCES

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

**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 119016, [www.transunion.com](http://www.transunion.com), 1-800-888-4213

**Free Credit Report.** It is recommended that you remain vigilant by reviewing account statements and monitoring your credit report for unauthorized activity, especially activity that may indicate fraud and identity theft. 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. The credit reporting agencies can also provide information about fraud alerts and security freezes.

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 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, Maryland, New Jersey, Puerto Rico, 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 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 at least one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft and you have 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.

**Security Freeze.** You have the ability to place a security freeze, also known as a credit freeze, on your credit report free of charge.

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 use an online process, an automated telephone line, or submit 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 5 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, and display your name, 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 minimize the risks of identity theft, including the use of fraud alerts and security freezes.

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).

**For Maryland residents:** You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, [www.oag.state.md.us](http://www.oag.state.md.us), 1-888-743-0023.

**For North Carolina residents:** You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, [www.ncdoj.gov](http://www.ncdoj.gov), 1-877-566-7226.

**For New York residents:** The Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <https://ag.ny.gov/>.

**For Connecticut residents:** You may contact the Connecticut Office of the Attorney General, 165 Capitol Avenue, Hartford, CT 06106, 1-860-808-5318, [www.ct.gov/ag](http://www.ct.gov/ag).

**For District of Columbia residents:** You may contact the Office of the Attorney General for the District of Columbia, 400 6th Street, NW, Washington, DC 20001, 202-727-3400, <https://oag.dc.gov/about-oag/contact-us>.

### Reporting of identity theft and obtaining a police report.

**For Iowa residents:** You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

**For Oregon residents:** You are advised to report any suspected identity theft to law enforcement, including the Federal Trade Commission, and the Oregon Attorney General.

## TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

### **Triple Bureau Credit Monitoring and Single Bureau Credit Report**

Your current credit report is available for you to review. You will also receive alerts when there are changes to your credit data at any of the three national credit bureaus—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you will have the option to call a Kroll fraud specialist, who will be able to help you determine if it is 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.

### **Public Persona**

Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you will receive an alert.

### **Quick Cash Scan**

Quick Cash Scan monitors short-term and cash-advance loan sources. You will receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.

### **\$1 Million Identity Fraud Loss Reimbursement**

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

### **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 will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.