



May 22, 2018

Office of the Attorney General
New Hampshire Department of Justice
33 Capitol Street
Concord, NH 03301

2018 MAY 24 AM 11:21

STATE OF
DEPT OF JUS

To Whom It May Concern:

Pursuant to RSA 359-C:20, we are writing to notify you of an unauthorized disclosure of personal information involving one New Hampshire resident.

From March 17, 2018 to May 7, 2018, due to a manual processing error by a Fidelity associate, access to the resident's account was inadvertently granted to an advisory firm, with whom Fidelity does business. As a result of our error, that advisory firm had the ability to access the account information through our proprietary web portal. Through our internal review, we confirmed that that the advisory firm did not access the account through our proprietary web portal during the period of incorrect access. However, the resident's personal information was included in a daily secure electronic transmission to the firm's third-party portfolio management system. Information about the account, included the resident's name, Social Security number, date of birth, account number, positions, balances and transaction history, was included in secure daily transmissions to the firm's third-party portfolio management system.

Fidelity became aware of the matter on May 7, 2018 when the resident's advisor contacted us with an inquiry regarding the resident's account. We reviewed the data, noted the error and corrected it that same day. The account information is no longer being sent to the third-party nor is it accessible to the other financial advisor.

This incident impacted one New Hampshire resident. We notified the resident by letter on May 18, 2018. A copy of the letter is attached.

If you have any questions, please contact me at 617-392-1224.

Sincerely,

William G. Duserick
Chief Privacy Officer
Fidelity Investments

Attachment



May 18, 2018

[Name]
[Street Address]
[City, NH Zip Code]

Dear [Name]:

We are writing regarding the recent disclosure of some personal information about you related to your Fidelity brokerage account ending in XXXX, which is managed by your advisor, Independence Financial Advisors. We are keenly aware of how important the security and privacy of your personal information are to you and sincerely regret this matter.

WHAT HAPPENED?

Due to an administrative error, Fidelity inadvertently granted another investment advisory firm access to your account from March 17, 2018 to May 7, 2018. This other advisory firm has a business relationship with Fidelity. Through our internal review of system access logs, we can confirm that the advisory firm did not access your account through our proprietary Web portal during this period. However, personal information about you was included in a daily secure electronic transmission to the firm's third-party portfolio management system. Fidelity became aware of the issue on May 7, 2018 after an inquiry your advisor.

WHAT INFORMATION WAS INVOLVED?

Information about the account, including your name, Social Security number, date of birth, account number, positions, balances and transaction history, was available to the other advisory firm and included in secure daily transmissions to the firm's third-party portfolio management system.

WHAT WE ARE DOING.

Upon notification of the issue on May 7, 2018, Fidelity removed the other advisory firm's access to the account and the information is no longer included in transmissions to their third-party portfolio management system. We researched the issue and determined the cause was a manual processing error. The issue has been reviewed with the Fidelity associate who was responsible for the error.

WHAT YOU CAN DO.

It is always a sensible precaution to remain vigilant for fraudulent activity or identity theft by regularly reviewing your account statement, monitoring free credit reports, and promptly reporting any suspicious activity. Fidelity has arranged for you to enroll, at your option, in a credit monitoring service for one year at no cost to you. This service allows you to monitor your credit reports and to detect any unusual activity that may affect your personal financial situation. It is provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies. If you decide to enroll, please refer to the enclosed instruction sheet.

OTHER IMPORTANT INFORMATION.

Enclosed is information on additional ways you can protect yourself.

FOR MORE INFORMATION.

Please feel free to call your advisor at (XXX) XXX-XXXX.

Sincerely,

A handwritten signature in cursive script that reads "William S. Duserick".

William Duserick
Chief Privacy Officer

Cc: [Advisor Name]

CREDIT MONITORING INSTRUCTION SHEET

Complimentary Credit Monitoring Service

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online three-bureau credit monitoring service (*myTrueIdentity*) for 1-year provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies.

To enroll in this service, go to the *myTrueIdentity* website at www.mytrueidentity.com and in the space referenced as “Enter Activation Code”, enter the following 12-letter Activation Code **XXXXXXXXXXXX** and follow the three steps to receive your credit monitoring service online within minutes.

If you do not have access to the Internet and wish to enroll in a similar offline, paper based, three-bureau credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the following 6-digit telephone pass code **XXXXXX** and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and August 31, 2018. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion®, Experian® and Equifax®, or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

Once you are enrolled, you will be able to obtain 1-year of unlimited access to your TransUnion credit report and credit score. The daily three-bureau credit monitoring service will notify you if there are any critical changes to your credit files at TransUnion, Experian and Equifax, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised to help you restore your identity and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

ADDITIONAL STEPS TO PROTECT YOURSELF

Directions for Placing a Fraud Alert

You may want to consider placing an initial fraud alert on your credit file. A fraud alert tells creditors to contact you before they open any new accounts or change your existing accounts. You may place a fraud alert in your file by calling one of the three nationwide credit reporting agencies. The agency that processes your fraud alert will notify the other two credit reporting agencies on your behalf. An initial fraud alert stays on your credit report for 90 days. When you place this alert on your credit report, you will receive information about ordering one free credit report from each of the credit reporting companies. Once you receive your reports, review them carefully for inquiries from companies you did not contact, accounts you did not open, and debts on your accounts that you cannot explain. Verify the accuracy of your Social Security number, address(es), full name and employer(s). Notify the credit reporting companies if any information is incorrect.

Equifax: 877-478-7625 www.equifax.com; PO Box 740241, Atlanta GA, 30374-0241

Experian: 888-397-3742 www.experian.com; PO Box 9532, Allen TX 75013

TransUnion LLC: 800-680-7289 www.transunion.com; PO Box 6790, Fullerton CA 92834

Directions for Obtaining a Credit Report

Please remember that while this matter may not involve significant risk, it is always good practice to take sensible steps to protect yourself by regularly reviewing your account statements and your credit report. As you may know, under federal law, you are entitled to one free copy of your credit report every 12 months from each of the major credit reporting agencies. You may obtain a free copy of your credit report by calling 1-877-FACT ACT (1-877-322-8228) or by visiting www.annualcreditreport.com.

Resources

Additional information on identity theft is available from the Federal Trade Commission (FTC). You may contact the FTC to report any incidents of identity theft and to obtain guidance about protecting against identity theft.

Federal Trade Commission
Consumer Response Center
600 Pennsylvania Avenue, NW
Washington, DC 20580

Toll-free Identity Theft Helpline: 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261

Website: www.ftc.gov/bcp/edu/microsites/idtheft/