



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

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CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302
Wayne, PA 19087

March 26, 2019

INTENDED FOR ADDRESSEE(S) ONLY

VIA U.S. MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Security Incident

Dear Attorney General MacDonald:

We represent FirstLease, Inc. ("FirstLease") headquartered at 1 Walnut Grove Drive, Suite 300, Horsham, PA 19044, and write in follow-up to our February 15, 2019 communication to notify you, on behalf of the organization(s) identified in *Exhibit A*, of the impact of the event described in our February 15, 2019 communication on the security of personal information owned by these organization(s), relating to New Hampshire residents. The investigation into this matter is ongoing, and this notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, FirstLease does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

As explained in our February 15, 2019 communication, on December 26, 2018, FirstLease confirmed that emails containing personal information relating to certain individuals were accessed or acquired without authorization by an unknown actor. FirstLease first became aware of unusual activity in an employee's email account on October 15, 2018 and immediately launched an investigation with the assistance of computer forensics experts. Through this investigation, FirstLease determined that an unknown individual accessed the email account of a FirstLease employee and certain messages contained therein between September 6, 2018 and September 20, 2018 and established a rule to forward email messages received by this employee to an unauthorized Gmail account on September 6, 2018. The rule continued to operate until it was discovered and disabled on November 29, 2018. As soon as FirstLease detected potential suspicious activity within the employee's email account, it changed the account credentials and launched an investigation. FirstLease then undertook a lengthy and labor-intensive process to identify the protected information contained within the affected email account.

The information that was subject to unauthorized access includes: name and Social Security number.

Notice to New Hampshire Residents

On or about February 15, 2019, FirstLease provided notice of this incident in substantially the same form as the letter attached here as *Exhibit B* to the owners of the protected information contained within the email account and offered to provide notice to its impacted customers and necessary regulatory bodies. Thereafter, FirstLease received direction from the data owners identified in *Exhibit A* to provide such notice. On or about March 26, 2019, FirstLease began providing written notice of this incident to affected individuals affiliated with these data owners, which includes [Number of Affected Individuals] New Hampshire resident(s), in substantially the same form as the letter attached here as *Exhibit C*.

Other Steps Taken and To Be Taken

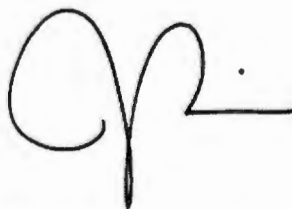
Upon discovering the event, FirstLease moved quickly to investigate and respond to the incident, assess the security of their systems, and notify potentially affected individuals. FirstLease reset passwords for the affected account, disabled forwarding rules from their email environment, implemented multi-factor authentication for email access, and conducted additional employee training. Additionally, FirstLease is reviewing its policies and procedures relating to data security.

FirstLease is offering affected individuals twelve (12) months of complimentary credit monitoring and identity restoration services through ID Experts. Additionally, FirstLease is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4774.

Very truly yours,

A handwritten signature in black ink, appearing to be 'JAC', with a horizontal line extending to the right.

Jennifer A. Coughlin of
MULLEN COUGHLIN LLC

JAC:mal
Enclosures

EXHIBIT A

Data Owner	Number of Affected Individuals
[REDACTED]	1

EXHIBIT B

FirstLease, Inc.

C/O ID Experts
PO Box 10444
Dublin, Ohio 43017

[Business Name]
[First Name] [Last Name]
[Data Owner Address]

February 15, 2019

RE: Formal Notice of Data Privacy Event

Dear [First Name] [Last Name]:

FirstLease, Inc. ("FirstLease") is writing to provide you with information regarding a data privacy event that may impact the personal information related to certain [Business Name] customers. We are also writing to inform you of our investigation to date and the steps we are taking in response.

What Happened? On December 26, 2018, we confirmed that an email or emails containing certain information potentially relating to your customers were accessed or acquired without authorization by an unknown actor. FirstLease first became aware of unusual activity in an employee's email account on October 15, 2018 and immediately launched an investigation with the assistance of computer forensics experts. We learned that FirstLease was the victim of unauthorized access to an employee's email account between September 6, 2018 and September 20, 2018, and that a rule was set up to forward email messages from the same email account to an outside Gmail account on September 6, 2018. The rule continued to operate until it was discovered and disabled on November 29, 2018. Since confirming that certain customer information was accessed, we began a lengthy process of identifying whether the customers were associated with our business partners. On January 23, 2019, we confirmed which of your customers' information may have been affected and moved quickly to notify you.

Upon discovery, the password for the affected account was changed, the forwarding rule was disabled, and the forwarding rule feature was disabled. Multi-factor authentication has since been enabled across our email system.

What Information Was Involved? The affected records contained customer name and one or more of the following data elements belonging to [Var. 5_##_affected] of your customers: [Var. 1_data elements]. Upon your request, we will securely make available a spreadsheet containing the names of the individuals whose information was included in these documents and the corresponding data points that were included in the documents for each affected individual.

What We Are Doing. We take this incident, and information security, very seriously at FirstLease. We have addressed the email credential compromise that caused this event. As indicated above, we are currently taking numerous steps to further enhance the security of our systems to better protect against future incidents of this kind.

As we cannot provide you with legal advice, we encourage you to consider your legal obligations independently. FirstLease is prepared to fulfill [Business name]'s obligation to provide notice as the data owner in this incident. FirstLease will mail notice of this event to the [Var. 5_##_affected] affected customers, notify necessary regulatory bodies, operate a call center for 90 calendar days dedicated to responding to inquiries regarding this incident, and provide complimentary credit monitoring and identity protection services to affected individuals. Notice will be provided to impacted individuals by way of letter in substantially the same form as attached in **Exhibit A**.

Request For Direction. Please advise by February 28, 2019 if you direct FirstLease to provide the individual and regulatory notices referenced above. **FirstLease will not take action on your behalf without being directed by you to do so.**

Additional Information. We understand you may have questions about this incident not addressed in this letter. Please do not hesitate to contact me at Donald@firstleaseonline.com or (267) 470-1933.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald Wampler". The signature is fluid and cursive, with a small flourish at the end.

Donald Wampler
President, FirstLease, Inc.

EXHIBIT A

FirstLease, Inc.

C/O ID Experts
PO Box 10444
Dublin, Ohio 43017

[First Name] [Last Name]
[Address]
[City], [State] [Zip]

To Enroll, Please Call:
(800) 939-4170
Or Visit:
<https://app.myidcare.com/account-creation/protect>
Enrollment Code: [XXXXXXXX]

[Date]

Re: Notice of Data Breach

Dear [First Name] [Last Name]:

FirstLease, Inc. ("FirstLease") is writing to inform you of a recent event that impacts the privacy of certain information relating to you that it received via email from [Business Name] as part of a recent application for leasing of business equipment. While we are unaware of any actual or attempted misuse of your information, we are providing you with information about the event, our response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

What Happened? On December 26, 2018, we confirmed that an email containing certain information relating to you was accessed or acquired without authorization by an unknown actor. We first identified suspicious activity within the account on October 15, 2018 and immediately launched an investigation with the assistance of computer forensics experts. We determined that an unknown individual accessed the email account of a FirstLease employee and certain messages contained therein between September 6, 2018 and September 20, 2018 and established a rule to forward email messages received by this employee to an unauthorized Gmail account on September 6, 2018. The rule continued to operate until it was discovered and disabled on November 29, 2018.

What Information Was Involved? As part of our ongoing investigation, we determined the security of an email message containing the following information relating to you was impacted during this incident: name, [data elements].

What We Are Doing. We take this incident very seriously. As soon as we detected potential suspicious activity within the employee's email account, we changed the account credentials and launched an investigation. This investigation, supported by two external information technology firms, is ongoing. As part of our ongoing commitment to the privacy of information in our care, we are reviewing our existing policies and procedures and implementing additional safeguards to further secure the information in our systems. We provided notice of this incident to [Business Name] We are providing notice of this incident to you, as well as to state regulatory agencies and consumer reporting agencies as required. As an added precaution, we are offering you complimentary access to [##_months] months of credit monitoring services.

What You Can Do. You can find out more about how to protect against potential identity theft and fraud, including how to enroll and receive the complimentary credit monitoring services we are offering to you, in the enclosed *Steps You Can Take to Better Protect Your Information*.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. Please call our dedicated assistance line at 800-939-4170 Monday through Friday between 9 A.M. and 8 P.M. Eastern Time.

We sincerely regret any inconvenience or concern this incident has caused.

Sincerely,

A handwritten signature in black ink, appearing to read 'Donald Wampler', with a stylized flourish at the end.

Donald Wampler
President, FirstLease, Inc.

Steps You Can Take to Protect Against Identity Theft and Fraud

You can sign up for the complimentary access to credit monitoring services. We are offering identity theft protection services through ID Experts®, the data breach and recovery services expert, to provide you with MyIDCare™. MyIDCare services include: [#_months] months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, MyIDCare will help you resolve issues if your identity is compromised.

We encourage you to contact ID Experts with any questions and to enroll in free MyIDCare services by calling 800-9394170 or going to <https://app.myidcare.com/account-creation/protect> and using the Enrollment Code provided above. MyIDCare experts are available Monday through Friday from 9 am - 8 pm Eastern Time. Please note the deadline to enroll is [Enrollment Deadline]. MyIDCare representatives can answer any questions or concerns you may have regarding protection of your personal information. Your enrollment code can be found on the top of the first page of this letter.

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a “security freeze” on your credit report, which will prohibit a consumer 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 using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian
PO Box 9554
Allen, TX 75013
1-888-397-3742

www.experian.com/freeze/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872

www.transunion.com/credit-freeze

Equifax
PO Box 105788
Atlanta, GA 30348-5788
1-800-685-1111

www.equifax.com/personal/credit-report-services

In order 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 (5) 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 either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Experian
P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-680-7289
www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
www.equifax.com/personal/credit-report-services

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, 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 also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, www.ncdoj.gov.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, 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 Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.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 Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, 1-401-247-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 6 Rhode Island residents impacted by this incident.

EXHIBIT C

FirstLease, Inc.

C/O ID Experts
P.O. Box 10444
Dublin, OH 43017-4044

To Enroll, Please Call:

(800) 939-4170

Or Visit:

<https://app.myidcare.com/account-creation/protect>

Enrollment Code: [XXXXXXXX]

[First Name] [Last Name]
[Address]
[City], [State] [Zip]

March 26, 2019

Re: Notice of Data Breach

Dear [First Name] [Last Name]:

FirstLease, Inc. ("FirstLease") is writing to inform you of a recent event that impacts the privacy of certain information relating to you that it received via email from [Var 4_name of Data Owner Broker] as part of a recent application for leasing of business equipment. While we are unaware of any actual or attempted misuse of your information, we are providing you with information about the event, our response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

What Happened? On December 26, 2018, we confirmed that an email containing certain information relating to you was accessed or acquired without authorization by an unknown actor. We first identified suspicious activity within the account on October 15, 2018 and immediately launched an investigation with the assistance of computer forensics experts. We determined that an unknown individual accessed the email account of a FirstLease employee and certain messages contained therein between September 6, 2018 and September 20, 2018 and established a rule to forward email messages received by this employee to an unauthorized Gmail account on September 6, 2018. The rule continued to operate until it was discovered and disabled on November 29, 2018.

What Information Was Involved? As part of our ongoing investigation, we determined the security of an email message containing the following information relating to you was impacted during this incident: name, [data elements].

What We Are Doing. We take this incident very seriously. As soon as we detected potential suspicious activity within the employee's email account, we changed the account credentials and launched an investigation. This investigation, supported by two external information technology firms, is ongoing. As part of our ongoing commitment to the privacy of information in our care, we are reviewing our existing policies and procedures and implementing additional safeguards to further secure the information in our systems. We provided notice of this incident to [Var 4_name of Data Owner Broker]. We are providing notice of this incident to you, as well as to state regulatory agencies and consumer reporting agencies as required. As an added precaution, we are offering you complimentary access to [##_months] months of credit monitoring services.

What You Can Do. You can find out more about how to protect against potential identity theft and fraud, including how to enroll and receive the complimentary credit monitoring services we are offering to you, in the enclosed *Steps You Can Take to Protect Against Identity Theft and Fraud*.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. Please call our dedicated assistance line at (800) 939-4170 Monday through Friday between 9 A.M. and 8 P.M. Eastern Time.

We sincerely regret any inconvenience or concern this incident has caused.

Sincerely,

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Donald Wampler
President, FirstLease, Inc.

Enclosure

Steps You Can Take to Protect Against Identity Theft and Fraud

You can sign up for the complimentary access to credit monitoring services. We are offering identity theft protection services through ID Experts®, the data breach and recovery services expert, to provide you with MyIDCare™. MyIDCare services include: [#_months] months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, MyIDCare will help you resolve issues if your identity is compromised.

We encourage you to contact ID Experts with any questions and to enroll in free MyIDCare services by calling (800) 939-4170 or going to <https://app.myidcare.com/account-creation/protect> and using the Enrollment Code provided above. MyIDCare experts are available Monday through Friday from 9 am - 8 pm Eastern Time. Please note the deadline to enroll is May 15, 2019. MyIDCare representatives can answer any questions or concerns you may have regarding protection of your personal information. Your enrollment code can be found on the top of the first page of this letter.

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a “security freeze” on your credit report, which will prohibit a consumer 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 using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian
PO Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872
www.transunion.com/credit-freeze

Equifax
PO Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
www.equifax.com/personal/credit-report-services

In order 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 (5) 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 either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Experian
P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-680-7289
www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
www.equifax.com/personal/credit-report-services

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, 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 also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, www.ncdoj.gov.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, 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 Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.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 Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, 1-401-247-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are [XXX] Rhode Island residents impacted by this incident.