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AUG 01 2022
CONSUMER PROTECTION

Nicholas J. DiCesare
Partner

July 29, 2022

VIA REGULAR MAIL

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

Re: Gardner Resources Consulting, LLC: Notice of Security Incident

Dear Office of the Attorney General:

We are writing on behalf of our client, Gardner Resources Consulting, LLC ("GRC"), to notify you of a recent breach of security incident involving computerized data that may have affected two hundred seventy (270) New Hampshire residents.

On September 3, 2021, GRC was the victim of a ransomware attack during which unauthorized actors gained access to some of GRC's electronic systems. Upon first learning of the attack, GRC immediately took steps to secure the systems and began an investigation to determine the nature and scope of the incident with the assistance of cybersecurity experts. Ultimately, the investigation was unable to determine how the perpetrators were able to gain access to the system or specifically what data they may have been able to access. However, GRC was able to secure its systems after the attack, and did not respond to or pay the ransom demanded by the criminals.

The investigation was unable to determine with any degree of certainty what data may have been accessed by the threat actor, or what, if any, data may have been exfiltrated. GRC thereafter identified all individuals who may have had any protected personal information on its system, and notification is being mailed or emailed to such individuals on July 29, 2022. A copy of template for notification to individuals is provided herewith.

The potential information at issue includes drivers' license numbers or other government-issued IDs, Social Security Numbers, and possible financial account information. At this time, we have found no evidence that information was misused as a result of this incident. Nonetheless, GRC has offered credit monitoring for 12 months through TransUnion, and has also established a call center through Epiq to address questions or concerns of any individuals potentially impacted by the incident.

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In response to the breach, GRC engaged legal counsel to assist with its investigation and response, and worked with a cybersecurity expert to perform a forensic investigation. GRC's cybersecurity expert performed a full risk assessment of GRC's system. GRC conducted further training of employees and has retained information security experts to review its technology protections and actively monitor its systems for unusual activity.

If you have any questions regarding this submission or require additional information, kindly contact me. Thank you.

Very truly yours,

Nicholas J. DiCesare

NJD: bcs

Gardner Resources
CONSULTING

Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
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Notice of Data Breach

Dear <<Name 1>>,

We are writing to tell you about a data security incident at Gardner Resources Consulting, LLC ("GRC") that may have exposed some of your personal data. We take the protection and proper use of your information very seriously. For this reason, we are contacting you directly to explain the circumstances of the incident.

What happened?

We recently completed an investigation into a cybersecurity incident experienced by GRC in September 2021 in which unauthorized users gained access to some of GRC's systems. Upon first learning of the incident, GRC immediately took steps to secure its systems and began an investigation with the assistance of cybersecurity experts. Ultimately, the investigation was unable to determine how the perpetrators were able to gain access to the system or specifically what data they may have been able to access. However, GRC has since been able to fully restore and secure its systems.

What information was involved?

Out of an abundance of caution and to address any potential issues, we have worked since the incident to identify any individuals for whom GRC might have maintained any data. Through our investigation, we recently determined that GRC may have had some of your data on its systems that could have been accessed during the incident, including a social security number, driver's license number or other government-issued IDs, and potentially financial account information (if you shared this information with GRC).

What we are doing

While we cannot determine with certainty whether your data was accessed by the unauthorized user, or that it has been misused, we want to notify you of this incident and assure you that we take it very seriously. Although GRC has always taken great care to ensure the protection of the data it maintains, we have implemented additional measures to further protect our systems, including conducting further training of employees to identify potentially malicious emails. We also retained information security experts to review our technological protections and actively monitor our systems for unusual activity. To help relieve concerns and restore confidence following this incident, we have secured the services of an online credit monitoring service (*my*TrueIdentity) provided by TransUnion Interactive, a subsidiary of TransUnion®, at no cost to you for <<CM Length>>. Please refer to the attached sheet at the end of this letter for more information on how to enroll.

What you can do.

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.

For more information.

If you have questions, please call 1-844-615-0811, Monday through Friday from 9:00 a.m. to 9:00 p.m. Eastern Time. Please have your membership number ready.

Protecting your information is important to us. We trust that the services we are offering to you demonstrate our continued commitment to your security and satisfaction.

Sincerely,

Steve Naha
CEO

ADDITIONAL RESOURCES

Contact information for the three nationwide credit reporting agencies:

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
Experian, PO Box 2104, Allen, TX 75013, www.experian.com, 1-888-397-3742
TransUnion, PO Box 2000, Chester, PA 19016, 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.

To order your annual free credit report please visit **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 ("FTC") website at www.consumer.ftc.gov) to:

Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, 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.

You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, 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, 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, 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.

For Massachusetts residents: You may contact the Office of the Massachusetts Attorney General, 1 Ashburton Place, Boston, MA 02108, 1-617-727-8400, www.mass.gov/ago/contact-us.html

For Vermont residents: WARNING: DO NOT PROVIDE PERSONAL INFORMATION IN RESPONSE TO ELECTRONIC COMMUNICATIONS REGARDING SECURITY BREACHES.

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 Massachusetts residents: You have the right to obtain a police report if you are a victim of identity theft.

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

TransUnion

Activation Code: <<Activation Code>>

1-Bureau TransUnion Credit Monitoring Product Offering: (Online and Offline)

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*my*TrueIdentity) for <<CM Length>> provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies.

To enroll in this service, go directly to the *my*TrueIdentity website at **www.mytrueidentity.com** and in the space referenced as "Enter Activation Code", enter the following unique 12-letter Activation Code **<< Activation Code>>** 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, 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 **<<Engagement number >>** 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.

Once you are enrolled, you will be able to obtain <<CM Length>> of unlimited access to your TransUnion credit report and VantageScore® credit score by TransUnion. The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion®, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The service also includes the ability to lock and unlock your TransUnion credit report online, access to identity restoration services that provides assistance in the event 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.)

You can sign up for the *my*TrueIdentity online Credit Monitoring service anytime between now and **<<Enrollment deadline>>.** 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 credit file at TransUnion®, or an address in the United States (or its territories) and a valid Social Security number, or are under the age of 18. Enrolling in this service will not affect your credit score.

If you have questions about your *my*TrueIdentity online credit monitoring benefits, need help with your online enrollment, or need help accessing your credit report, or passing identity verification, please contact the *my*TrueIdentity Customer Service Team toll-free at: 1-844-787-4607, Monday-Friday: 8am- 9pm, Saturday-Sunday: 8am-5pm Eastern time.