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May 28, 2021

VIA EMAIL

Attorney General Gordon MacDonald
Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301
DOJ-CPB@doj.nh.gov

Re: Notification of Data Security Incident

Dear Attorney General:

We represent General Insulation Company, Inc. (“General Insulation”), a Massachusetts-based nationwide distributor of industrial and commercial insulation, fire-stopping products for the construction industry. This letter is being submitted because the personal information of certain state residents may have been affected by a recent data security incident experienced by General Insulation described in greater detail below. General Insulation has taken steps to notify potentially-affected individuals in connection with this incident and to minimize the likelihood of a similar incident occurring in the future.

1. Nature of the security incident.

On March 26, 2021, General Insulation experienced a data security incident that disrupted access to certain systems. Upon discovering this, we immediately took steps to secure our network and launched an investigation with the assistance of cybersecurity experts to determine what happened and whether sensitive information may have been accessed or acquired without authorization. General Insulation then conducted a comprehensive review of the data that resulted in identifying certain New Hampshire residents whose information (Social Security numbers, driver’s license numbers, and financial account information) may have been involved. General Insulation then worked diligently to identify up-to-date address information and issue notification.

2. Number of New Hampshire residents affected.

General Insulation notified four New Hampshire residents of this incident via first class U.S. mail on May 28, 2021. A sample copy of the notification letter is included with this correspondence.

3. Steps taken relating to the Incident.

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Upon discovering this incident, General Insulation took steps to secure its network and launched an investigation with the assistance of cybersecurity experts to determine what happened and whether sensitive information may have been accessed or acquired without authorization. General Insulation has also implemented additional safeguards to reduce the risk of a similar incident occurring in the future. In addition, General Insulation reported this matter to the Federal Bureau of Investigation and will fully cooperate with any investigation.

4. Contact information.

General Insulation is committed to the security of all information within its possession. If you have any questions or need additional information, please do not hesitate to contact me at Brian.Craig@lewisbrisbois.com or by phone at 202-926-2904.

Sincerely,

Brian Craig of
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure Sample Notification Letter



General Insulation Company
C/O IDX
10300 SW Greenburg Rd. Suite 570
Portland, OR 97223

To Enroll, Please Call:
1-800-939-4170

Or Visit:
<https://app.idx.us/account-creation/protect>

Enrollment Code: <<XXXXXXXXXXXX>

<<First Name>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip Code>>

May 28, 2021

Re: Notice of Data Security Incident

Dear <<First Name>> <<Last Name>>,

We are writing to inform you of a recent data security incident that may have involved your personal information. At General Insulation Company, Inc. (“General Insulation”), we are committed to the privacy and security of our employees’ information. This is why we are writing to notify you of this incident and to inform you of steps you can take to help protect your information.

What Happened? On March 26, 2021, General Insulation experienced a data security incident that disrupted access to certain systems. We immediately took steps to secure our network and launched an investigation with the assistance of cybersecurity experts to determine what happened and whether sensitive information may have been affected. Through this process, we discovered that information in your personnel file may have been accessed without authorization during the incident. Out of an abundance of caution, we are notifying you about what happened so that you can take steps to help protect your information.

What Information Was Involved? The information may have involved information contained in your personnel file, including your Social Security number, driver’s license number, and financial account information.

What We Are Doing. As soon as we discovered this incident, we took the measures referenced above and implemented enhanced security measures to help prevent a similar incident from occurring in the future. We also notified the Federal Bureau of Investigation and will fully cooperate with any investigation. In addition, we are providing you information about steps you can take to help protect your personal information and identity protection services through IDX, a data security and recovery services expert. Your complimentary services include 12 months of credit and CyberScan monitoring.

What You Can Do. Please read the recommendations included with this letter which you can follow to help protect your personal information. You can also enroll in the 12 months of credit and CyberScan monitoring being provided to you, at no cost. To enroll, call 1-800-939-4170 or go to <https://app.idx.us/account-creation/protect> and use the Enrollment Code provided above. Please note that the deadline to enroll is August 28, 2021

For More Information. If you have any questions or need assistance, please call 1-800-939-4170 Monday through Friday from 9:00 a.m. – 9:00 p.m. Eastern Time. Our representatives are fully versed on this incident and can answer any questions you may have regarding how to help safeguard your personal information.

Thank you for your patience through this incident. We take your trust in us and this matter very seriously. Please accept our sincere apologies and know that we deeply regret any worry or inconvenience that this may cause you.

Sincerely,

A handwritten signature in black ink that reads "Ellen J. Sirois". The signature is written in a cursive style with a large initial "E" and a distinct "Sirois" at the end.

Ellen Sirois
Chief Information Officer
General Insulation Company, Inc.

Steps You Can Take to Further Protect Your Information

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You also can contact one of the following three national credit reporting agencies:

TransUnion P.O. Box 1000 Chester, PA 19016 1-800-916-8800 www.transunion.com	Experian P.O. Box 2002 Allen, TX 75013 1-888-397-3742 www.experian.com	Equifax P.O. Box 740241 Atlanta, GA 30374 1-866-349-5191 www.equifax.com	Free Annual Report P.O. Box 105281 Atlanta, GA 30348 1-877-322-8228 annualcreditreport.com
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Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: Under U.S. law, you have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

Federal Trade Commission 600 Pennsylvania Ave, NW Washington, DC 20580 consumer.ftc.gov , and www.ftc.gov/idtheft 1-877-438-4338	Maryland Attorney General 200 St. Paul Place Baltimore, MD 21202 https://oag.state.md.us 1-888-743-0023	North Carolina Attorney General 9001 Mail Service Center Raleigh, NC 27699 https://ncdoj.gov 1-877-566-7226	Rhode Island Attorney General 150 South Main Street Providence, RI 02903 http://www.riag.ri.gov 401-274-4400	Washington D.C. Attorney General 441 4th Street, NW Washington, DC 20001 https://oag.dc.gov/ 202-727-3400
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You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf