

March 23, 2022

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Via electronic-mail: attorneygeneral@doj.nh.gov

Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, New Hampshire 03302

Re: Our Client : Grandison Management, Inc.;
Towne Home Care, LLC
Matter : Data Security Incident on March 15, 2021
Wilson Elser File # : 16516.1529

Dear Attorney General Formella:

Wilson Elser Moskowitz Edelman and Dicker LLP (“Wilson Elser”) represents Grandison Management, Inc.”), Towne Home Care, LLC (hereinafter “Towne Home”), and their affiliate companies located in Howell, New Jersey, with respect to a data security incident described in more detail below. Grandison, Town Home, and their affiliate companies take the security and privacy of the information in their control seriously, and have taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the security breach, the number of New Hampshire residents being notified, what information has been compromised, and the steps that Grandison, Town Home, and their affiliate companies are taking to restore the integrity of the system. We have also enclosed hereto a sample of the notifications made to the potentially impacted individuals, which include an offer of free credit monitoring.

1. Nature of the Security Incident

On May 15, 2021, Grandison, Towne Home, and their affiliate companies were the victim of a ransomware attack. Upon detecting this incident, these entities moved quickly to initiate a response, which included confirming, with the assistance of its managed service provider and external forensic and cybersecurity experts, the sensitivity of data accessed. It was ultimately determined that various types of personal information were potentially exposed.

Grandison, Towne Home, and their affiliate companies perform a variety of services including health staffing, home health, and health payment services. The personal information at risk differed

based on the entity and individual involved. Collectively: full name, social security number, financial account information including credit card numbers, and medical information were potentially exposed. This information is maintained for standard operational procedures. The list of individuals to notify was determined on January 4, 2022.

As of this writing, Grandison, Towne Home, and their affiliate companies have not received any reports of related identity theft since the date the incident was discovered.

2. Number of New Hampshire Residents Affected

A total of sixteen (16) residents of New Hampshire were potentially affected by this security incident. Notification letters to these individuals were mailed between February 8, 2022 and March 14, 2022, by first class mail, and should have been or will be received by individuals promptly. Samples of the different notification letters sent are included with this letter.

3. Steps Taken

Upon learning of this incident, Grandison, Towne Home, and their affiliate companies moved quickly to institute a response plan, which included conducting an investigation with the assistance of third-party forensic specialists and engaging in steps to confirm the security of any relevant systems. A comprehensive internal review of these systems followed, in order to identify individuals whose information may have been compromised, as well as the type of information potentially compromised. Individual written notifications were then mailed.

Law enforcement was also notified, and communications are ongoing with the FBI's Newark Field Office. Grandison, Towne Home, and their affiliate companies have implemented additional technical and operational safeguards and are also reviewing and altering their policies and procedures relating to the security of systems and servers.

4. Contact Information

Grandison, Towne Home, and their affiliate companies remain dedicated to protecting the sensitive information in their control. If you have any questions or need additional information, please do not hesitate to contact me at Rachel.Cobble@WilsonElser.com or 205.709.8991.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP



Rachel H. Cobble, Esq.

Enclosure: *Sample Notification Letters*

<<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 in order to inform you of an incident that may have exposed some of your sensitive personal information. We take the privacy of your personal information seriously and want to provide you with information and resources you can use to help protect your information.

What happened?

<<b2b_text_1(Client Name)>> detected and stopped a network security incident on May 17, 2021. An unauthorized third-party infiltrated our network. We immediately shut off access to the network and engaged specialized third-party forensic and technical resources to respond to the incident. <<b2b_text_1(Client Name)>> has secured and remediated its network and the data that we maintain.

What information was involved?

As you know, <<b2b_text_1(Client Name)>> provides health care services. Although we have no evidence that your information was specifically misused, it is possible that during the network compromise your sensitive personal and health information may have been exposed to an unauthorized party, including: <<b2b_text_2(full name, mailing address, data elements)>>. We maintain this information on our system for standard treatment and organizational purposes.

What we are doing.

Once our environment was secure, we initiated a comprehensive investigation into the extent of the unauthorized activity. As of this writing, <<b2b_text_1(Client Name)>> has not received any reports of related identity theft since the date of the incident.

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. 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, Fraud Consultation, and Identity Theft Restoration.

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

You have until <<b2b_text_6(activation deadline)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s_n>>

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

Additional information describing your services is included with this letter.

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-???-???-????, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central 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. <<Variable 1(Client name)>> values the security of your personal data, and we apologize for any inconvenience that this incident has caused.

Sincerely,

The Management Team of <<b2b_text_1(Client Name)>>

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, 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.

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

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.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

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

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll 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.

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.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

<<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 in order to inform you of an incident that may have exposed some of your sensitive personal information. We take the privacy of your personal information seriously and want to provide you with information and resources you can use to help protect your information.

What happened?

<<b2b_text_1(Client Name)>> detected and stopped a network security incident on May 17, 2021. An unauthorized third-party infiltrated our network. We immediately shut off access to the network and engaged specialized third-party forensic and technical resources to respond to the incident. <<b2b_text_1(Client Name)>> has secured and remediated its network and the data that we maintain.

What information was involved?

Although we have no evidence that your information was specifically misused, it is possible that your following personal sensitive information may have been exposed to an unauthorized party: <<b2b_text_2(full name, mailing address, data elements)>>. We maintain this information on our system for standard treatment and organizational purposes.

What we are doing.

Once our environment was secure, we initiated a comprehensive investigation into the extent of the unauthorized activity. As of this writing, <<b2b_text_1(Client Name)>> has not received any reports of related identity theft since the date of the incident.

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. 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, Fraud Consultation, and Identity Theft Restoration.

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You have until <<b2b_text_6(activation deadline)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s_n>>

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

Additional information describing your services is included with this letter.

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 (855) 618-3105, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central 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. <<b2b_text_1(Client Name)>> values the security of your personal data, and we apologize for any inconvenience that this incident has caused.

Sincerely,

The Management Team of <<b2b_text_1(Client Name)>>

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, 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.

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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.

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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

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.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

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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.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

<<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 in order to inform you of an incident that may have exposed some of your sensitive personal information. We take the privacy of your personal information seriously and want to provide you with information and resources you can use to help protect your information.

What happened?

Grandison Management, Inc. (“Grandison”) partners with <<b2b_text_1(Client Name)>> to process payroll. Grandison detected and stopped a network security incident on May 17, 2021. An unauthorized third-party infiltrated our network. We immediately shut off access to the network and engaged specialized third-party forensic and technical resources to respond to the incident. <<b2b_text_1(Client Name)>> has secured and remediated its network and the data that we maintain.

What information was involved?

Although we have no evidence that your information was specifically misused, it is possible that your following personal sensitive information may have been exposed to an unauthorized party: <<b2b_text_2(full name, mailing address, data elements)>>. We maintain this information on our system for standard treatment and organizational purposes.

What we are doing.

Once our environment was secure, we initiated a comprehensive investigation into the extent of the unauthorized activity. As of this writing, <<b2b_text_1(Client Name)>> has not received any reports of related identity theft since the date of the incident.

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Membership Number: <<Membership Number s_n>>

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Additional information describing your services is included with this letter.

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 (855) 618-3105, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central 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. <<b2b_text_1(Client Name)>> values the security of your personal data, and we apologize for any inconvenience that this incident has caused.

Sincerely,

The Management Team of Grandison Management, Inc.

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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.

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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.



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