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COUGHLIN<sub>LLC</sub>  
ATTORNEYS AT LAW

RECEIVED

FEB 18 2021

CONSUMER PROTECTION

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February 9, 2021

**VIA U.S. MAIL**

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

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent Great Northern Corporation ("GNC") located at 395 Stroebe Road, P.O. Box 939, Appleton, WI 54914, and are writing to notify your Office of an incident that may affect the privacy of personal information related to certain New Hampshire residents. This notice may be supplemented with any new significant facts learned subsequent to this submission. By providing this notice, GNC does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

**Nature of the Data Event**

On September 5, 2020, GNC discovered a malware infection impacting certain company systems. GNC immediately worked to restore its systems and launched an investigation, with assistance from third-party computer forensic specialists, to determine the nature and scope of the incident. The investigation determined that certain GNC data was subject to unauthorized access and/or acquisition during the incident. Therefore, GNC conducted a comprehensive programmatic and manual review of the potentially impacted information to determine the type of information and to whom it related. On December 21, 2020, GNC completed the review and began obtaining contact information to notify potentially impacted individuals about this incident. GNC also worked to engage additional services and resources for these individuals. GNC is unaware of any actual or attempted misuse of personal information and is providing notice to potentially affected individuals out of an abundance of caution.

The types of personal information potentially impacted vary by individual but include name and the following: Social Security Number and financial account information.

### **Notice to New Hampshire Residents**

On February 9, 2021, GNC began providing written notice of this incident to affected individuals, which includes four (4) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

### **Other Steps Taken and To Be Taken**

Upon learning of this incident, GNC moved quickly to investigate and respond to this incident, assess the security of its systems, restore functionality to its environment, and notify potentially affected individuals. As part of its ongoing commitment to the security of information, GNC notified federal law enforcement and is reviewing and enhancing existing policies and procedures to reduce the likelihood of a similar future event.

As an added precaution, GNC is offering impacted New Hampshire residents access to twelve (12) months of free credit monitoring and identity protection services through Epiq. GNC is also providing impacted New Hampshire residents with guidance on how to better protect against identity theft and fraud. Such guidance includes information on how to place a fraud alert and security freeze on one's credit file, contact details for the national consumer reporting agencies, information on how to obtain a free credit report, reminders to remain vigilant for incidents of identity theft and fraud by reviewing account statements and monitoring free credit reports, and recommendations regarding how 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) 930-2190.

Very truly yours,



Kevin Mekler of  
MULLEN COUGHLIN LLC

KMK/amw  
Enclosure

# **EXHIBIT A**

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

&lt;&lt;Mail ID&gt;&gt;

&lt;&lt;Name 1&gt;&gt;

&lt;&lt;Name 2&gt;&gt;

&lt;&lt;Address 1&gt;&gt;

&lt;&lt;Address 2&gt;&gt;

&lt;&lt;Address 3&gt;&gt;

&lt;&lt;Address 4&gt;&gt;

&lt;&lt;Address 5&gt;&gt;

&lt;&lt;City&gt;&gt;&lt;&lt;State&gt;&gt;&lt;&lt;Zip&gt;&gt;

&lt;&lt;Country&gt;&gt;

&lt;&lt;Date&gt;&gt;

**Re: Notice of Data Breach**

Dear &lt;&lt;Name 1&gt;&gt;:

Great Northern Corporation ("GNC") is writing to notify you of an incident that may have impacted the security of your personal information. We want to provide you with information about the incident, our response, and steps you may take to better protect against possible misuse of your personal information, should you feel it necessary to do so.

**What Happened?** On September 5, 2020, GNC discovered a malware incident impacting certain company systems. We immediately worked to restore our systems and launched an investigation, with assistance from third-party computer forensic specialists, to determine the nature and scope of the incident. Our investigation determined that certain GNC data was subject to unauthorized access and/or acquisition during the incident. Therefore, we conducted a comprehensive programmatic and manual review of the potentially impacted information to determine the type of information and to whom it related. On December 21, 2020, we completed the review and began obtaining contact information to notify potentially impacted individuals about this event. We also worked to engage additional services and resources for these individuals. Although we are unaware of any actual or attempted misuse of your personal information, we are providing you this notice out of an abundance of caution.

**What Information was Involved?** The investigation determined that your name and <<Data Elements>> may have been accessed and/or acquired by an unauthorized individual.

**What We Are Doing.** We take this incident and the security of personal information in our care very seriously. Upon learning of this incident, we moved quickly to investigate and respond to this incident, assess the security of our systems, restore functionality to our environment, and notify potentially affected individuals. As part of our ongoing commitment to the security of information, we notified federal law enforcement and are reviewing and enhancing existing policies and procedures to reduce the likelihood of a similar future event.

As a precautionary measure, we are notifying potentially affected individuals, including you, so that you may take further steps to best protect your personal information, should you feel it is appropriate to do so.

We regret any inconvenience or concern this incident may cause. As an added precaution, GNC is offering you access to <<12/24>> months of free credit monitoring and identity protection services through TransUnion at no cost to you.

**What You Can Do.** Please review the enclosed *Steps You Can Take to Protect Your Information*, which contains information on what you can do to better protect against possible misuse of your information. 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. You will also find information on how to enroll in the credit monitoring services offered.

**For More Information.** We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call the dedicated assistance line at 800-360-6201 from 8 a.m. to 8 p.m. CST.

Again, we take the privacy and security of personal information in our care seriously and sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

*John Davis*

John Davis  
Chief Executive Officer  
Great Northern Corporation

## *Steps You Can Take to Protect Your Information*

### **Enroll in Credit Monitoring**

#### **Complimentary One-Year myTrueIdentity Credit Monitoring Service**

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

#### **How to Enroll: You can sign up online or via U.S. mail delivery**

- To enroll in this service, go to the myTrueIdentity website at [www.MyTrueIdentity.com](http://www.MyTrueIdentity.com) and, in the space referenced as "Enter Activation Code," enter the 12-letter Activation Code <<Insert Unique 12-letter 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 six-digit telephone passcode <<Insert static 6-digit Telephone Pass Code>> 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 <<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 a credit file with TransUnion 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.

#### **ADDITIONAL DETAILS REGARDING YOUR 12-MONTH COMPLIMENTARY CREDIT MONITORING SERVICE:**

- Once you are enrolled, you will be able to obtain one year of unlimited access to your TransUnion credit report and credit score.
- 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, changes 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 and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

### **Monitor Accounts**

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](http://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 all three (3) major consumer reporting agencies listed below:

**Experian**  
PO Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

**TransUnion**  
P.O. Box 160  
Woodlyn, PA 19094  
1-888-909-8872  
[www.transunion.com/credit-freeze](http://www.transunion.com/credit-freeze)

**Equifax**  
PO Box 105788  
Atlanta, GA 30348-5788  
1-888-298-0045  
[www.equifax.com/personal/credit-report-services](http://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, only one (1) of the major consumer reporting agency needs to be contacted, please contact any one of the agencies listed below:

**Experian**  
P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/fraud/center.html](http://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](http://www.transunion.com/fraud-victim-resource/place-fraud-alert)

**Equifax**  
P.O. Box 105069  
Atlanta, GA 30348  
1-800-525-6285  
[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

### **Additional Information**

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](http://www.identitytheft.gov), 1-877-ID-THEFT (1-877-438-4338); 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 1-919-716-6000, [www.ncdoj.gov](http://www.ncdoj.gov). You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

*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/>.