

akerman

RECEIVED

Kristen McKinney

JUN 18 2018

CONSUMER PROTECTION

Akerman LLP
777 South Flagler Drive
Suite 1100 West Tower
West Palm Beach, FL 33401

T: 561 653 5000
F: 561 659 6313

June 15, 2018

Via Certified Mail: 9414 7266 9904 2960 5753 71

Gordon J. MacDonald, Attorney General
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notice of Security Breach

Dear Attorney General MacDonald:

Please be advised that our firm represents GreatBanc Trust Company (“GreatBanc”). GreatBanc serves as trustee for ESOPs in public and private companies across the United States. GreatBanc is located in Lisle, Illinois, which is a western suburb of Chicago.

During the week of October 23, 2017, GreatBanc received indication that one of its computers was improperly accessed as the result of an email phishing scam. GreatBanc immediately began an investigation and hired a computer forensic specialist to assist it. The investigation revealed that an unauthorized third party accessed one of its employee email accounts. The unauthorized third party created an email folder and attempted to direct emails relating to “wire transfers” to the account. GreatBanc has no evidence to suggest that any emails in the account were copied or transferred. Despite having no indication that individual emails were accessed, GreatBanc undertook a comprehensive review of all of the information contained in the email account to ascertain whether personal information could have been accessed. Based on that review, GreatBanc has determined that the personal information of approximately 21 New Hampshire residents may have been accessible; however, GreatBanc has not discovered any information to suggest that the information was reviewed. The email account included personal information such as names, addresses, dates of birth and/or social security numbers.

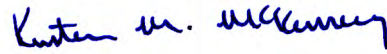
In order to minimize the possibility of a future attack and to protect the privacy of its clients, GreatBanc has implemented additional security measures in response to this incident, including: additional educational training and testing and two-factor authentication before emails can be accessed outside of the office. In July, GreatBanc will implement a portal for the transfer of sensitive documents.

Enclosed please find a copy of the notification letter that GreatBanc intends to mail to the impacted New Hampshire residents on or around June 15, 2018. The letter includes information about identify theft protection and enrollment in free identity theft protection services, which GreatBanc is offering to impacted residents through AllClear ID.

Gordon J. MacDonald, Attorney General
June 15, 2018
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Please feel free to contact me at kristen.mckinney@akerman.com or (561) 273-5565 if you have any questions or concerns.

Very truly yours,



Kristen M. McKinney

cc: Julie Gorgeau, General Counsel, GreatBanc Trust Company (jgoveau@greatbanctrust.com)
Carolyn V. Metnick, Esq. (Carolyn.Metnick@akerman.com)

Enclosure



Processing Center • P.O. BOX 141578 • Austin, TX 78714



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ACD1234

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JOHN Q. SAMPLE
1234 MAIN STREET
ANYTOWN US 12345-6789

June 15, 2018

NOTICE OF DATA BREACH

Dear John Sample:

GreatBanc Trust Company serves as the Trustee of your Employee Stock Ownership Plan and respects the privacy of your information, which is why we are writing to let you know about an incident that may affect the security of your personal information.

What Happened?

For the first time in our history, during the week of October 23, 2017, we received indication that one of our computers was improperly accessed as the result of an email phishing scam. We immediately began an investigation and hired a computer forensic specialist to assist us. The investigation revealed that an unauthorized third party accessed one of our email accounts. The unauthorized third party created an email folder and attempted to direct emails relating to “wire transfers” to the account. We have no evidence to suggest that any emails in the account were copied or transferred. We then retained counsel experienced in data breach to assist us with complying with regulatory requirements. Despite having no indication that individual emails were accessed, we were advised that we needed to undertake a comprehensive review of all of the information contained in the email account to ascertain if any personal information *could have been accessed*.

What Information Was Involved?

Based on that review we have determined that your personal information, such as name, address, date of birth and/or social security number, was contained in the email account. While we cannot determine whether your personal information was viewed, we have no reason to believe that it has been misused in any way.

What We Are Doing.

GreatBanc Trust Company values your privacy and deeply regrets that this incident occurred. In order to minimize the possibility of a future attack and to protect the privacy of our valued clients, we have implemented additional security measures in response to this incident, including: additional educational training and testing and two-factor authentication before emails can be accessed outside the office. In July, we will be implementing a portal for transfer of sensitive documents which will eliminate those from running through the email system.

What You Can Do.

To learn about steps that you may take to guard against identity theft or fraud, please review the enclosed Information About Identity Theft Protection document.



01-02-1-00

Other Important Information.

As a precaution, we have arranged to have AllClear ID protect your identity for 12 months at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next 12 months.

AllClear Identity Repair: This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-326-5116 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

AllClear Fraud Alerts with Credit Monitoring: This service offers the ability to set, renew, and remove 90-day fraud alerts on your credit file to help protect you from credit fraud. In addition, it provides credit monitoring services, a once annual credit score and credit report, and a \$1 million identity theft insurance policy. To enroll in this service, you will need to provide your personal information to AllClear ID. You may sign up online at enroll.allclearid.com or by phone by calling 1-855-326-5116 using the following redemption code: Redemption Code.

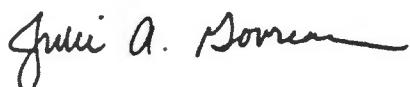
Please note: Following enrollment, additional steps are required by you in order to activate your phone alerts and fraud alerts, and to pull your credit score and credit file. Additional steps may also be required in order to activate your monitoring options.

For More Information.

If you have further questions or concerns about this incident, you can find more information on our website at www.greatbanctrust.com. You may also contact AllClear ID at 1-855-326-5116, Monday through Saturday, 8:00 a.m. -- 8:00 p.m. Central Time.

Your privacy and security are extremely important to us and we sincerely regret any inconvenience or concern caused by this incident.

Sincerely,



Julie A. Govreau
Senior Vice President & General Counsel
GreatBanc Trust Company

Information About Identity Theft Protection

We recommend that you regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

Equifax: P.O. Box 740241, Atlanta, Georgia 30374-0241, 1-800-685-1111, www.equifax.com
Experian: P.O. Box 9532, Allen, TX 75013, 1-888-397-3742, www.experian.com
TransUnion: P.O. Box 1000, Chester, PA 19022, 1-800-888-4213, www.transunion.com

When you receive your credit reports, review them carefully. Look for accounts or creditor inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number, that is not accurate. If you see anything you do not understand, call the reporting agency at the telephone number on the report.

We recommend you remain vigilant with respect to reviewing your account statements and credit reports, and promptly report any suspicious activity or suspected identity theft to us and to the proper law enforcement authorities, including local law enforcement, your state's attorney general and/or the Federal Trade Commission ("FTC"). You may contact the FTC or your state's regulatory authority to obtain additional information about avoiding identity theft.

Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, D.C. 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

For residents of Maryland: You may also obtain information about preventing and avoiding identity theft from the Maryland Office of the Attorney General:

Maryland Office of the Attorney General, Consumer Protection Division
200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us

For residents of Massachusetts: You also have the right to obtain a police report.

For residents of North Carolina: You may also obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office:

North Carolina Attorney General's Office, Consumer Protection Division
9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, www.ncdoj.gov

Fraud Alerts: There are also two types of fraud alerts that 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 90 days. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with 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 calling the toll-free fraud number of any of the three national credit reporting agencies listed below.

Equifax: 1-888-766-0008, www.equifax.com
Experian: 1-888-397-3742, www.experian.com
TransUnion: 1-800-680-7289, fraud.transunion.com

Credit Freezes (for Non-Massachusetts Residents): You may have the right to put a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. In addition, you may incur fees to place, lift and/or remove a credit freeze. Credit freeze laws vary from state to state. The cost of placing, temporarily lifting, and removing a credit freeze also varies by state, generally \$5 to \$20 per action at each credit reporting company. *Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company.* Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:



Equifax: P.O. Box 105788, Atlanta, GA 30348, www.equifax.com
Experian: P.O. Box 9554, Allen, TX 75013, www.experian.com
TransUnion LLC: P.O. Box 2000, Chester, PA, 19022-2000, freeze.transunion.com

You can obtain more information about fraud alerts and credit freezes by contacting the FTC or one of the national credit reporting agencies listed above.

Credit Freezes (for Massachusetts Residents): Massachusetts law gives you the right to place a security freeze on your consumer reports. A security freeze is designed to prevent credit, loans and services from being approved in your name without your consent. Using a security freeze, however, may delay your ability to obtain credit. You may request that a freeze be placed on your credit report by sending a request to a credit reporting agency by certified mail, overnight mail or regular stamped mail to the address below:

Equifax: P.O. Box 105788, Atlanta, GA 30348, www.equifax.com
Experian: P.O. Box 9554, Allen, TX 75013, www.experian.com
TransUnion LLC: P.O. Box 2000, Chester, PA, 19022-2000, freeze.transunion.com

Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. The following information should be included when requesting a security freeze (documentation for you and your spouse must be submitted when freezing a spouse's credit report): full name, with middle initial and any suffixes; Social Security number; date of birth (month, day and year); current address and previous addresses for the past five (5) years; and applicable fee (if any) or incident report or complaint with a law enforcement agency or the Department of Motor Vehicles. The request should also include a copy of a government-issued identification card, such as a driver's license, state or military ID card, and a copy of a utility bill, bank or insurance statement. Each copy should be legible, display your name and current mailing address, and the date of issue (statement dates must be recent). The credit reporting company may charge a reasonable fee of up to \$5 to place a freeze or lift or remove a freeze, unless you are a victim of identity theft or the spouse of a victim of identity theft, and have submitted a valid police report relating to the identity theft to the credit reporting company.