



ROPE & GRAY LLP
2099 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20006-6807
WWW.ROPEGRAY.COM

Edward R. McNicholas
T 202.508.4779
Edward.McNicholas@RopesGray.com

March 9, 2022

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

Re: GreenSlate Data Incident

Dear General Formella:

We write on behalf of our client, GreenSlate LLC (“GreenSlate” or the “Company”), a business services and software company headquartered in New York, to inform you of a recent security incident that may have affected the personal information of approximately 74 New Hampshire residents.

On December 22, 2021, GreenSlate’s security team detected that between December 10 and December 15, 2021, a now-former employee in Canada downloaded scanned paperwork and certain electronic documents containing some of our clients’ employees’ personal information. The incident was the result of insider theft, not a hack or external attack.

The affected individuals’ personal information varied by document but may have included name, date of birth, Social Security Number (or Social Insurance Number for Canadians), work authorization papers, and direct deposit bank account information.

GreenSlate contacted law enforcement and the Toronto Police Service has been actively pursuing an investigation. On March 1, 2022, the Toronto Police Service arrested the suspected criminal, and GreenSlate is now able to provide notice of this incident without interfering with the law enforcement investigation.

GreenSlate is offering impacted individuals a complimentary 24-month credit monitoring subscription through Kroll. Additional information on credit monitoring services is included in the attached sample of the notification made to the affected parties, which will be sent by mail on March 9, 2022.

Respectfully,

Edward R. McNicholas

Enclosure: Form of Individual Notice



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

Notice of Data Breach

Dear <<first_name>> <<middle_name>> <<last_name>>:

We are writing to share with you some important information regarding a recent incident involving your personal information.

What Happened?

On December 22, 2021, GreenSlate's security team detected that between December 10 and December 15, 2021, a now-former employee in Canada downloaded scanned paperwork and certain electronic documents containing some of our clients' employees' personal information. On December 23, 2021, we retained leading firms to investigate in coordination with the authorities. On that same date we contacted the FBI, the Royal Canadian Mounted Police, and the Toronto Police Service.

The individual stole the scanned paperwork and electronic documents while they were an employee. GreenSlate's background check on the employee did not indicate any criminal background. Importantly, the GreenSlate application was not hacked or otherwise compromised. GreenSlate systems undergo external audits and penetration testing for independent assurance of its control environment.

The Toronto Police Service has been actively pursuing an investigation and executing search warrants. On March 1, 2022, TPS arrested the suspected criminal, and GreenSlate is now able to provide notice of this incident without interfering with the law enforcement investigation.

What Information Was Involved?

The affected individuals' personal information varied by document but may have included your name, date of birth, Social Security Number, Social Insurance Number, work authorization papers, and direct deposit bank account information.

What We Are Doing

To help protect your information, GreenSlate has arranged to provide you with identity monitoring services for 24 months provided by Kroll at no cost to you. We are making this free identity monitoring available to you out of an abundance of caution in case you find it useful, but we do not intend this provision of identity monitoring services to suggest that you face any substantial risk of harm.

What You Can Do

It is always advisable that individuals regularly review their financial accounts and report any suspicious or unrecognized activity immediately. The enclosed "Identity Theft Information" provides further information about steps that individuals can take. Federal consumer protection agencies recommend that you remain vigilant for the next 12 to 24 months and that you report any suspected incidents of fraud to the relevant financial institution.

We encourage you to take advantage of the complimentary identity monitoring services we are offering. You should in particular consider whether you wish to request a credit freeze.

We regret this incident and any inconvenience to you. If we can be of help in any way, please contact our dedicated agents at 1-855-541-3575, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays. Please have your membership number ready.

Sincerely,

Matthew Truenow
Chief Information Security Office
GreenSlate



TAKE ADVANTAGE OF YOUR 24-MONTH KROLL MEMBERSHIP

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

You have until <<b2b_text_6 (Activation Date)>> 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.

If you prefer to activate these services offline and receive monitoring alerts via the US Postal Service, you may activate via our automated phone system by calling 1-888-653-0511, Monday through Friday, 8:00 a.m. to 5:30 p.m. Central time, excluding major U.S. holidays. Please have your membership number located in your letter ready when calling. Please note that to activate monitoring services, you will be required to provide your name, date of birth, and Social Security number through our automated phone system.

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

Triple Bureau Credit Monitoring and Single Bureau Credit Report

Your current credit report is available for you to review. You will also receive alerts when there are changes to your credit data at any of the three national credit bureaus—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you will 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.

Web Watcher

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

Public Persona

Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you will receive an alert.

Quick Cash Scan

Quick Cash Scan monitors short-term and cash-advance loan sources. You will receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.

\$1 Million Identity Fraud Loss Reimbursement

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

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.

IDENTITY THEFT INFORMATION

It is always advisable to 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 2104, Allen, TX 75013. 1.888.397.3742. www.experian.com
- **TransUnion**, P.O. Box 2000, Chester, PA 19016, www.transunion.com, 1-800-888-4213. www.transunion.com

Fraud Alert: You may contact the fraud department of the three major credit bureaus to request that a “fraud alert” be placed on your file. A fraud alert notifies potential lenders to verify your identification before extending credit in your name.

Equifax:	Report Fraud:	1.800.685.1111
Experian:	Report Fraud:	1.888.397.3742
TransUnion:	Report Fraud:	1.800.680.7289

Security Freeze for Credit Reporting Agencies: You may request a security freeze on your credit reports. A security freeze prohibits a credit reporting agency from releasing any information from a consumer’s credit report without written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services. It is free to place, lift or remove a security freeze. You must separately place a security freeze on your credit report at each credit bureau. To do so, you must contact the credit bureaus by phone, mail, or secure electronic means:

- **Equifax:** P.O. Box 105788, Atlanta, GA 30348, 1.800.349.9960, www.Equifax.com
- **Experian:** P.O. Box 9554, Allen, TX 75013, 1.888.397.3742, www.Experian.com
- **TransUnion:** P.O. Box 2000, Chester, PA 19106, 1.888.909.8872, www.TransUnion.com

To request a security freeze, you will need to provide your full name (including middle initial, Jr., Sr., Roman numerals, etc.), Social Security number, date of birth, address(es) where you have lived over the prior five years, proof of current address such as a current utility bill, a photocopy of a government-issued ID card, and, 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.

If you request a freeze online or by phone, the agency must place the freeze within one business day. The credit bureaus have three business days after receiving a request by mail to place a security freeze on your credit report, and they must also send confirmation to you within five business days and provide you with a unique personal identification number (PIN) or password, or both that can be used by you to authorize the removal or lifting of the security freeze. To lift the freeze to allow a specific entity or individual access to your credit report, you must contact the credit reporting agencies and include (1) proper identification; (2) the PIN number or password provided to you when you placed the security freeze; and (3) the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available.

You also have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf or www.ftc.gov.

Steps You Can Take if You Are a Victim of Identity Theft

- **File a police report.** Get a copy of the report to submit to your creditors and others that may require proof of a crime.

- Contact the U.S. Federal Trade Commission (FTC). The FTC provides useful information to identify theft victims and maintains a database of identity theft cases for use by law enforcement agencies. File a report with the FTC by calling the FTC's Identity Theft Hotline: 1-877-IDTHEFT (438-4338); online at <http://www.ftc.gov/idtheft>; or by mail at Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Ave., N.W., Washington, D.C. 20580. Also request a copy of the publication, "Take Charge: Fighting Back Against Identity Theft" from to https://www.consumer.ftc.gov/articles/pdf-0009_identitytheft_a_recovery_plan.pdf
- Keep a record of your contacts. Start a file with copies of your credit reports, the police reports, any correspondence, and copies of disputed bills. It is helpful to log conversations with creditors, law enforcement officials, and other relevant parties.

Additional Steps to Avoid Identity Theft: The FTC has further information about steps to take to avoid identity theft at: <http://www.ftc.gov/idtheft>; calling 1-877-IDTHEFT (438-4338); or write to Consumer Response Center, Federal Trade Commission, 600 Pennsylvania Ave., N.W., Washington, D.C. 20580.

State Specific Information

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.

Iowa residents may contact law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity theft. This office can be reached by visiting the website at www.iowaattorneygeneral.gov, calling (515) 281-5164 or requesting more information from the Office of the Attorney General, Hoover State Office Building, 1305 E. Walnut Street, Des Moines, IA 50319.

Maryland residents can learn more about preventing identity theft from the Maryland Office of the Attorney General, by visiting their web site at <http://www.marylandattorneygeneral.gov/Pages/IdentityTheft/default.aspx>, calling the Identity Theft Unit at 1.410.567.6491, or requesting more information at the Identity Theft Unit, 200 St. Paul Place, 16th Floor, Baltimore, MD 21202.

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

New Mexico residents have the right to obtain a police report and request a security freeze as described above and you have rights under the Fair Credit Reporting Act as described above.

New York residents can learn more about security breach response and identity theft prevention and protection information by visiting the New York Attorney General Office's website at <https://ag.ny.gov>, or calling 1-800-771-7755, or visiting the New York Department of State Division of Consumer Protection website at <http://www.dos.ny.gov/consumerprotection>, or calling 518-474-8583 / 1-800-697-1220.

North Carolina residents can learn more about preventing identity theft from the North Carolina Office of the Attorney General, by visiting their web site at <https://ncdoj.gov/protecting-consumers/identity-theft/calling> 1.919.716.6400 or requesting more information from the North Carolina Attorney General's Office, 9001 Mail Service Center Raleigh, NC 27699-9001.

Oregon residents may obtain information about preventing identity theft from the Oregon Attorney General's Office. This office can be reached by visiting the website at www.doj.state.or.us, calling (503) 378-4400 or requesting more information from the Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096.

Rhode Island residents have the right to obtain a police report and request a security freeze as described above. The consumer reporting agencies may require that you provide certain personal information (such as your name, Social Security Number, date of birth and address) and proper identification (such as a copy of a government-issued ID card and a bill or statement) prior to honoring your request. Residents can learn more by contacting the Rhode Island Office of the Attorney General at 1.410.274.4400 or 150 South Main Street, Providence, Rhode Island 02903.

Vermont residents may learn helpful information about fighting identity theft, placing a security freeze, and obtaining a free copy of your credit report on the Vermont Attorney General's website at <https://ago.vermont.gov/>.