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CONSUMER PROTECTION

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Crystal Jones
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Director, & Acting Data Protection
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March 2, 2018

VIA REGULAR MAIL

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

Re: *Notice of Unauthorized Access of Personal Information Pursuant to NH under NH Rev Stat §359-C:20*

Dear Attorney General Gordon J. MacDonald:

I understand that you and your department are designated to receive notification under NH Rev Stat §359-C:20, the New Hampshire Data Breach Notification Law, in the event of a compromise of personal identifiable information (PII) and highly sensitive information (HSI) (collectively, Personal Data). On February 8, 2018, an unauthorized ICF employee received certain current and former ICF employees' Personal Data through ICF's general company email.

An authorized ICF employee accidentally e-mailed a file with W-2 statements for approximately 900 current and former ICF employees to a current ICF employee email account (ICF Recipient). This email was not encrypted or password protected, and the ICF Recipient was an unauthorized recipient. The authorized ICF employee sent the e-mail to the ICF Recipient in response to ICF Recipient's request for their own W-2; however, the ICF Recipient was sent not only their own W-2 statement, but others as well. Promptly upon realizing it was not the intended information, the ICF Recipient deleted the file and notified ICF on February 10, 2018, of the inadvertent disclosure.

Of those 900 ICF employees who were affected, this included 14 (Fourteen) residents of the State of New Hampshire.

ICF investigated the incident and determined the Personal Data specifically included, name, postal address, social security number, and earnings information. We have no

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evidence of related identity theft or other malicious behavior for this incident, due to the limited transmission of the information, the prompt response from the switch actions taken by the ICF Recipient (including alerting the appropriate company department of the error), and incident response measures we undertook. These measures included, but are not limited to, ICF:

- appropriately notifying the affected employees regarding this issue.
- verifying the ICF Recipient deleted the W-2 statements from the ICF Recipient's email account.
- verifying the email containing the W-2 statements does not exist on other unauthorized systems or devices.
- verifying the ICF Recipient did not forward the email outside of the ICF email system.
- reinforcing our established data privacy and data security safeguards within the department which inadvertently disclosed the information to prevent similar future situations.

To monitor and mitigate any possibility of identity theft, ICF also offered all affected employees data protection safeguards such as credit monitoring and identify theft services. Please find enclosed a copy of the notice.

If you or your office have any questions, please feel free to contact me.

Respectfully,

A handwritten signature in black ink that reads "Crystal Jones". The signature is written in a cursive, flowing style.

Enclosures



March 2, 2018

9300 Lee Highway
Fairfax, Virginia 22031

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icf.com

DELIVERED VIA E-MAIL: individual.name@gmail.com

Sender's Name
Sender's Title
T +1 703 934 XXXX
Senders.name@icf.com

Individual Name
Street Address
City, State and Postal Code
Date

Subject: Credit Monitoring and ID Theft Services

Dear Employee (Fname, Lname),

Data Privacy Incident Notice

As promised and as a supplement to my February 16, 2018, correspondence titled, W2 Distribution Incident, ICF is offering you credit monitoring and ID theft services for 12 months.

You may find the link to access the InfoArmor website and enrollment page at <http://www.InfoArmor.com/ICFProtect>. Enclosed is a summary description of InfoArmor services.

For More Information

ICF values your privacy and deeply regrets that this incident occurred. If you have any questions regarding this incident or if you desire further information or assistance, please contact me at 703-225-2849 or Richard.Taylor@icf.com. Our Data Protection Team also is available to answer any additional via dataprotection@icf.com.

Yours Truly,

Richard Taylor
Controller

Enclosure



Cc: Kelly Shaffer, Assistant Controller
Joe Dyer, Senior Director and Chief Information Security Officer
Crystal Jones, Assistant General Counsel and Director, Corporate Business Services