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April 3, 2018

RECEIVED
APR 06 2018
CONSUMER PROTECTION

NH Department of Justice
33 Capitol Street
Concord, NH 03301
ATTN: Attorney General

Re: Notice of Breach

Dear Sir or Madame:

This letter is sent on behalf of our client, the Institute for Supply Management® (“ISM”), which is located in Tempe, Arizona. Pursuant to LAC 16:III.701, this letter is a notification of a potential breach of personal information that may affect one person or business whom we believe may reside in New Hampshire. In light of the impossibility of knowing at this time whether an actual breach of personal information has occurred under the circumstances, ISM has voluntarily notified the potentially affected New Hampshire resident of this risk.

Based on ISM’s investigation to date, at this time we believe that, on or about January 25, 2018, an unauthorized sender caused “phishing” emails to be sent to email addresses contained in an ISM employee’s email contacts list, which was contained on or accessed by a mobile computing device used by that employee for exchanging emails with certain ISM customers. The phishing emails that ISM was able to identify contained links to an apparently fake “DocuSign” web site, the purpose of which we suspect was to trick recipients into clicking on a link that would have (consistent with typical phishing schemes) requested that the recipient provide information or otherwise comply with a fraudulent request for information or transfers of funds. According to threat intelligence publicly reported by IBM, the same or a similar pattern of phishing email schemes hit a number of U.S. businesses, including Fortune 500 companies, within the same time frame but without actually breaching or otherwise gaining access to those businesses’ corporate networks.

At this time we are not aware of any indication that the senders of the phishing emails tried or were able to gain access to ISM’s computer networks or to obtain the actual contents of ISM customers’ emails. However, out of an abundance of caution, while we do not have any direct evidence that the senders of the phishing emails caused a breach and obtained personal information regarding ISM customers in New Hampshire or elsewhere, ISM has nonetheless

notified those ISM customers out because we cannot rule out this risk at this time based on our current information.

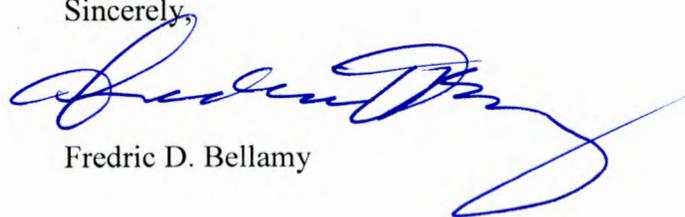
In addition to conducting its own prompt response to contain and eradicate any potential risk from this incident, pursuant to its incident response plan, ISM commissioned a review by a leading independent cybersecurity consultant to determine the level of exposure and provide recommendations for remediation. Consistent with the recommendations of ISM's expert cybersecurity consultant, ISM also engaged this law firm as legal counsel to review the circumstances and prepare any necessary notifications. To further mitigate any potential risk, ISM required all employee passwords to be reset. In addition, ISM advanced its rollout of an already planned implementation of two-factor authentication to access company email accounts.

We are sending you this notification because our investigation identified email from an New Hampshire -based email address that was stored in the affected employee email account. While we cannot know for certain whether that email was accessed, if an email was accessed, information within that email may have been exposed. However, while we have no direct evidence that the following occurred, it is possible that such email contained an New Hampshire -based email address and potentially a credit or debit card number and the name on the card if it was used to make any purchases from ISM. It remains unknown whether personal information was accessed, but we want to inform you of this risk.

Please understand that ISM takes the privacy and security of customer data very seriously. We believe that this was an isolated incident that was quickly addressed by our security procedures. Requests for further information may be directed to ISM through its outside counsel in this matter:

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Sincerely,



Fredric D. Bellamy

FDB/jc