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MAY 15 2017

CONSUMER PROTECTION

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May 11, 2017

**VIA U.S. MAIL**

Attorney General Joseph Foster  
Office of the New Hampshire Attorney General  
Attn: Security Breach Notification  
33 Capitol Street  
Concord, NH 03301

**Re: Notice of Data Security Incident**

Dear Attorney General Foster:

We represent ITA Group, Inc. ("ITA"), 4600 Westown Pkwy, West Des Moines, Iowa. We are writing to notify you of a data security incident that may have compromised the security of personal information of one (1) individual residing in New Hampshire. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, ITA does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

**Nature of the Data Security Event**

ITA manages company referral incentive programs for its clients. ITA recently discovered that a system error associated with the incentive program for one of its clients was temporarily allowing for potential unauthorized access to certain program participants' account information. ITA discovered the error on April 7, 2017 and worked tirelessly to investigate the issue and confirm its full nature and scope. The possibility of unauthorized access was corrected on April 7, 2017. ITA has received no reports of misuse of the information. ITA believes the system error originated on or about December 28, 2016.

### **Notice to New Hampshire Resident**

On May 5, 2017, ITA provided preliminary notice by way of email. On May 11, 2017, ITA will mail notice letters to all affected individuals and businesses, including one (1) individual residing in New Hampshire, whose personal information was compromised while the system error was in place.

### **Other Steps Taken**

Once ITA discovered the incident, it took immediate steps to respond and to protect the information at issue. ITA disabled user access that same day which quickly restored the security of the system. ITA did not allow access until it had verified that the system error had been corrected.

ITA is providing all potentially affected individuals and businesses access to one free year of credit and identity monitoring services, including identity restoration services, through Experian. Additionally, ITA is providing potentially impacted individuals and businesses with guidance on how to better protect against identity theft and fraud, including information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. ITA is also providing written notice of this incident to other state regulators as necessary.

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 267-930-4775.

Very truly yours,

A handwritten signature in black ink, appearing to read "C DiIenno", with a stylized flourish at the end.

Chris DiIenno of  
MULLEN COUGHLIN LLC