



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED
JUN 07 2021
CONSUMER PROTECTION

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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

June 1, 2021

VIA U.S. MAIL

Consumer Protection Bureau
Office of the New Hampshire Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Sir or Madam:

We represent Jeff Bank located at 4864 NY-52, Jeffersonville, New York 12748, and are writing to notify your office of an incident that may affect the privacy of some personal information relating to one (1) New Hampshire resident. The investigation into this matter is ongoing, and this notice may be supplemented with any new significant facts learned after its submission. By providing this notice, Jeff Bank does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

On or about March 31, 2021, Jeff Bank discovered suspicious activity related to an employee's email account. Jeff Bank promptly commenced an investigation with assistance from third-party computer forensics specialists to determine the nature and scope of the activity. The investigation determined that an email phishing campaign targeted the employee's email account and resulted in unauthorized person(s) intermittently logging into the account between March 12 and March 31, 2021. However, the investigation was unable to determine which, if any, emails and attachments in the account were viewed by the unauthorized person(s). Out of an abundance of caution, Jeff Bank undertook a thorough review of the account's contents to determine whether they contained any sensitive information. Jeff Bank recently completed this review and determined, on May 5, 2021, that information related to certain individuals was present in the email account during the relevant time period. Jeff Bank took additional steps to identify address information for individuals and worked to provide notice of this event as quickly as possible.

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Jeff Bank cannot confirm if the unauthorized person(s) accessed or viewed any specific information relating to individuals. However, Jeff Bank determined that the information present in the relevant account included the following information related to New Hampshire residents: name and financial institution name.

Notice to New Hampshire Resident

On or about June 1, 2021, Jeff Bank is providing written notice of this incident to potentially affected individuals, which includes one (1) New Hampshire resident. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Information privacy and security are among Jeff Bank's highest priorities. As such, Jeff Bank has taken steps to enhance the security of its systems including by implementing additional email security measures. As part of its ongoing commitment to the privacy and security of information, Jeff Bank is providing enhanced training to its broader employee base on how to detect suspicious emails. Jeff Bank is also in the process of reviewing its existing policies and procedures to better prevent future events. Jeff Bank is providing individuals whose information was accessible access to complimentary credit monitoring services for one (1) year through Equifax.

Additionally, Jeff Bank is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Jeff Bank is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, 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.

Office of the New Hampshire Attorney General
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Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-6836.

Very truly yours,

A handwritten signature in black ink, appearing to read "Carolyn Purwin Ryan". The signature is written in a cursive style with a large initial "C" and "R".

Carolyn Purwin Ryan of
MULLEN COUGHLIN LLC

CPR/eyl

EXHIBIT A



Return Mail Processing Center
 P.O. Box 6336
 Portland, OR 97228-6336

<<Mail ID>>
 <<Name 1>>
 <<Name 2>>
 <<Address 1>>
 <<Address 2>>
 <<Address 3>>
 <<Address 4>>
 <<Address 5>>
 <<City>><<State>><<Zip>>
 <<Country>> <<Date>>

NOTICE OF <<VARIABLE TEXT 3>>

Dear <<Name 1>>:

Jeff Bank is writing to inform you of a recent event that may impact the privacy of some of your information. Although we are unaware of any actual or attempted misuse of your information, we are providing you with details about the event, steps we have taken in response, and resources available to help you better protect your information, should you feel it is appropriate to do so.

What Happened? On or about March 31, 2021, we discovered suspicious activity related to an employee’s email account. We promptly commenced an investigation to determine the nature and scope of the activity. The investigation determined that an email phishing campaign targeted the employee’s email account and resulted in unauthorized person(s) intermittently logging into the account between March 12 and March 31, 2021. However, the investigation was unable to determine which, if any, emails and attachments in the account were viewed by the unauthorized person(s). Out of an abundance of caution, we undertook a thorough review of the account’s contents to determine whether they contained any sensitive information. We recently completed this review and determined, on May 5, 2021, that information related to certain individuals was present in the email account during the relevant time period. We took additional steps to identify address information for individuals such as yourself and worked to provide notice of this event as quickly as possible.

What Information Was Involved? We cannot confirm if the unauthorized person(s) accessed or viewed any specific information relating to you. However, we determined that the information present in the relevant account included your name and <<Breached Elements>>.

What We Are Doing. Information privacy and security are among our highest priorities. We have taken steps to enhance the security of our systems by implementing additional email security measures. As part of our ongoing commitment to the privacy and security of information in our care, we are providing enhanced training to our broader employee base on how to detect suspicious emails. We are in the process of reviewing our existing policies and procedures to better prevent future events.

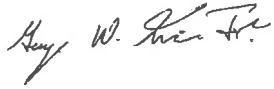
As an added precaution, we are also providing you with <<Variable Text 2 – CM Length>> of complimentary access to credit monitoring and identity restoration services through Equifax, along with guidance on how to better protect against the possibility of information misuse. We are covering the cost of these services, but due to privacy restrictions, you will need to complete the activation process yourself using the enrollment instructions below.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. You can find out more about how to better protect against the potential misuse of information in the enclosed *Steps You Can Take to Protect Information*. There, you will also find more information about the credit monitoring services we are offering and how to enroll.

For More Information. We understand that you may have questions about this event that are not addressed in this letter. If you have additional questions, please call 855-535-1841, Monday through Friday, 9:00 a.m. to 9:00 p.m. Eastern Time, excluding U.S. holidays. You may also write to us at: Jeff Bank, Attn: George Kinne, 4866 State Route 52, P.O. Box 398, Jeffersonville, NY 12748.

We apologize for any inconvenience this event may cause you and remain committed to the privacy of information in our possession.

Sincerely,

A handwritten signature in cursive script, appearing to read "George W. Kinne".

George Kinne
President and Chief Executive Officer
Jeff Bank

Steps You Can Take to Protect Information



Enter your Activation Code: <<Activation Code>>
Enrollment Deadline: <<Enrollment Deadline>>

Equifax Credit Watch™ Gold

*Note: You must be over age 18 with a credit file to take advantage of the product

Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications¹ when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts², which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock³
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁴

Enrollment Instructions

Go to www.equifax.com/activate.

Enter your unique Activation Code of <<Activation Code>> then click "Submit" and follow these 4 steps:

1. **Register:**

Complete the form with your contact information and click "Continue".

If you already have a myEquifax account, click the 'Sign in here' link under the "Let's get started" header.

Once you have successfully signed in, you will skip to the Checkout Page in Step 4.

2. **Create Account:**

Enter your email address, create a password, and accept the terms of use.

3. **Verify Identity:**

To enroll in your product, we will ask you to complete our identity verification process.

4. **Checkout:**

Upon successful verification of your identity, you will see the Checkout Page.

Click 'Sign Me Up' to finish enrolling.

You're done!

The confirmation page shows your completed enrollment.

Click "View My Product" to access the product features.

To sign up for US Mail delivery, dial 1-855-833-9162 for access to the Equifax Credit Watch automated enrollment process. Note that all credit reports and alerts will be sent to you via US Mail only.

1. Activation Code: You will be asked to enter your enrollment code as provided at the top of this letter.

2. Customer Information: You will be asked to enter your home telephone number, home address, name, date of birth and Social Security Number.

3. Permissible Purpose: You will be asked to provide Equifax with your permission to access your Equifax credit file and to monitor your file. Without your agreement, Equifax cannot process your enrollment.

4. Order Confirmation: Equifax will provide a confirmation number with an explanation that you will receive your Fulfillment Kit via the US Mail (when Equifax is able to verify your identity) or a Customer Care letter with further instructions (if your identity cannot be verified using the information provided). Please allow up to 10 business days to receive this information.

¹WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded. ²The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC. ³Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com. ⁴The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended "fraud alert" on a credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a "credit freeze" on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer's express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a fraud alert or credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th St NW, Washington, DC 20001; 202-727-3400; and oag@dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us. Jeff Bank is located at 4864 State Route 52, P.O. Box 398, Jeffersonville, NY 12748.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 2 Rhode Island residents impacted by this incident.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violators. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>.