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ATTORNEYS AT LAW

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JUN 08 2020

CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302
Wayne, PA 19087

June 2, 2020

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 Karr Barth Administrators, Inc. ("KB Administrators") located at One Belmont Avenue, Suite 705, Bala Cynwyd, PA 19004 and are writing to notify your office of an incident that may affect the security of some personal information relating to one (1) New Hampshire resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, KB Administrators 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

KB Administrators is a third-party benefits administration company that provides services to companies including Marmon Holdings, LLC ("Marmon") located at 181 West Madison Street, Chicago, IL 60602.

KB Administrators recently became aware of unusual activity involving a single employee email account. KB Administrators immediately began an investigation with the assistance of third-party computer specialists. The investigation determined that the employee email account had been accessed at varying times between March 6, 2020 and March 9, 2020 without authorization. Therefore, KB Administrators promptly began a thorough review of the contents of the email account to determine whether sensitive information was present at the time of the incident.

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KB Administrators completed this review on or around May 1, 2020, and determined that personal information as defined by N.H. Rev. Stat. § 359-C:19 (IV)(a) was present in the affected email account at the time of the incident, including the name and Social Security number of one (1) New Hampshire resident. This personal information related to individuals affiliated with certain clients of KB Administrators. KB Administrators notified its involved clients (including Marmon on May 8, 2020) upon making this determination. To date, the investigation has found no evidence of actual or attempted misuse of personal information as a result of this incident. KB Administrators is providing notice to the New Hampshire Attorney General's Office, on behalf of Marmon, because this incident involved a KB Administrators email account.

Notice to New Hampshire Resident

On June 2nd, 2020, KB Administrators will begin providing written notice of this incident to potentially affected individuals, which includes one (1) New Hampshire resident who are affiliated with Marmon. 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

Upon discovering the event, KB Administrators moved quickly to investigate and respond to the incident, assess the security of KB Administrators systems, and notify potentially affected clients. KB Administrators is also working to implement additional safeguards including multifactor authentication for all employees and training to its employees that focuses on data privacy threats involving email. KB Administrators is providing access to credit monitoring services for one (1) year, through Kroll, to individuals whose personal information was contained in the involved email account, at no cost to these individuals.

Additionally, KB Administrators is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud, including 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. KB Administrators also provided notice of this incident to law enforcement in an abundance of caution.

Office of the New Hampshire Attorney General

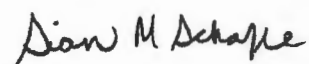
June 2, 2020

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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) 930-4799.

Very truly yours,

A handwritten signature in black ink that reads "Sian M. Schafle". The signature is written in a cursive style with a large initial 'S'.

Sian M. Schafle of
MULLEN COUGHLIN LLC

SMS:ncl
Enclosure

EXHIBIT A

KARR BARTH ADMINISTRATORS, INC.



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

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

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

KB Administrators, Inc. ("KB") works with companies, including <<b2b_text_1(DataOwner)>>, as a third-party benefits administrator. KB is writing, at the request of <<b2b_text_1(DataOwner)>>, to notify you of a recent event that may affect the security of some of your personal information. While, to date, we have no evidence that your information has been misused, we are providing you with information about the event, our response to it, and resources available to you to help protect your information, should you feel it appropriate to do so.

What Happened? KB recently became aware of unusual activity involving a single employee email account. We immediately began an investigation and worked quickly to assess the security of the email account. With the assistance of third-party computer specialists, on March 19, 2020, we determined that the employee email account had been accessed at varying times between March 6, 2020 and March 9, 2020 without authorization.

We reviewed the contents of the email account to determine whether sensitive information was present at the time of the incident. Through this review we determined that some of your information was present in the involved email account. To date, KB is unaware of any actual or attempted misuse of your information as a result of this incident.

What Information Was Involved? The investigation determined that at the time of the incident, the email account contained your <<b2b_text_2(ImpactedData)>>. Please note that while our investigation did not reveal evidence that your information was actually viewed by the unauthorized actor, we are providing you this notice to ensure you are aware of this incident.

What Is KB Doing? Information, privacy, and security are among our highest priorities. KB has strict security measures in place to protect information in our care. Upon learning of this incident, we moved quickly to investigate and respond to this incident and confirm the security of relevant systems. Our response included initiating a password reset, reviewing the contents of the email account for sensitive information, and notifying business partners associated with that sensitive information.

As part of our ongoing commitment to the security of information we are reviewing and enhancing existing policies and procedures and conducting additional workforce training. Although we are unaware of any actual or attempted misuse of your information as a result of this incident, we are offering you access to identity monitoring services through Kroll for twelve (12) months at no cost to you as an added precaution.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity for the next twelve (12) to twenty-four (24) months. You may review the information contained in the attached "Steps You Can Take to Help Protect Personal Information." You may also activate to receive the identity monitoring services we are making available to you through Kroll. KB will cover the cost of this service; however, you will need to activate yourself in this service.

For More Information. We recognize that you may have questions not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-844-989-2770 (toll free), Monday – Friday, 8:00 a.m. to 5:30 p.m., Central Time. You may also contact KB by mail at One Belmont Avenue, Suite 705, Bala Cynwyd, PA 19004, Attn: Privacy.

Sincerely,

Anthony E. Van Dervort

KB Administrators, Inc.

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Complimentary Identity Monitoring Services

We have secured the services of Kroll to provide identity monitoring at no cost to you for twelve months. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

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

You have until **August 30, 2020** to activate your identity monitoring services.

Membership Number: <<Member ID>>

Additional information describing your services is included with this letter.

Monitor Your Accounts

In addition to enrolling in the complimentary services detailed above, we encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity and to detect errors. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security 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 security 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 security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian

P.O. Box 9554

Allen TX 75013

1-888-397-3742

www.experian.com/freeze/center.html

TransUnion

P.O. Box 160

Woodlyn, PA 19094

1-800-909-8872

www.transunion.com/credit-freeze

Equifax

PO Box 105788

Atlanta, GA 30348-5788

1-800-685-1111

www.equifax.com/personal/credit-report-services

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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.);
7. 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.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your 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 agencies listed below:

Experian

P.O. Box 9554

Allen, TX 75013

1-888-397-3742

www.experian.com/fraud/center.html

TransUnion

P.O. Box 2000

Chester, PA 19016

1-800-680-7289

www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax

P.O. Box 105069

Atlanta, GA 30348

1-888-766-0008

www.equifax.com/personal/credit-report-services

Additional Information

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338), 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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and www.oag.state.md.us.

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 agencies 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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

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

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 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 no Rhode Island residents impacted by this incident.](#)

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

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

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—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.