



STATE OF NH
DEPT OF JUSTICE
2020 NOV 12 PM 4:04

CAMERON G. SHILLING
Direct Dial: (603) 628-1351
Email: cameron.shilling@mcclane.com
Licensed in NH and MA

November 10, 2020

Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03302

Re: Data Security Breach

To whom it may concern,

McLane Middleton, P.A. represents Keolis Commuter Services (“Keolis” or “Company”), which is located at 470 Atlantic Avenue, 5th Floor, Boston, Massachusetts 02210. We are writing to inform you about a data security breach that affects 869 individuals who are residents of the State of New Hampshire.

What Happened: Keolis operates and maintains the commuter rail system for the Massachusetts Bay Transportation Authority (“MBTA”). On Saturday, October 10, 2020, Keolis experienced a ransomware event. The Company’s advanced threat detection system alerted it to the situation, and Keolis deactivated its network within a few hours. The Company immediately notified law enforcement and MBTA, and hired an outside computer security forensic expert to help investigate and remediate. As a result, Keolis had restored its network to normal operations by Tuesday, October 13, 2020. Fortunately, the incident did not, and will not, impact the continued safe operations of the MBTA commuter rail.

On Thursday, October 15, 2020, Keolis discovered that some employee information was exported from its network during the incident. As a result, on Friday, October 16, 2020, the Company informed all employees about the matter, and its forensic expert and information technology (“IT”) team immediately investigated further. Based on that investigation, Keolis believes that one or more files containing information about some employees was compromised in the incident. Additionally, although Keolis does not have specific information that data about dependents of employees was actually compromised, a file with such data was maintained in a location within the IT infrastructure which may have been compromised.

What Information Was Involved: The files that Keolis believes were or may have been compromised contained the following types of information about some of its employees and

potentially some of their dependents: name; address; relationship of dependents to employees; age and date of birth of employees and dependents; social security number of employees and dependents; driver's license number of certain employees; and medical approval or disqualification for a position of certain employees. The Company is not aware that the files contained information about all employees and dependents, or that the files contained all such information about all of the individuals whose names appeared in the files. Nonetheless, Keolis is providing all current and former employees, together with all of the dependents listed in the potentially compromised files, with the following information and remedies.

What Keolis Is Doing: On November 10, 2020, Keolis (through Experian) is mailing the attached notices to all current and former employees and potentially affected adult dependents and minor dependents. As explained in the notices, Keolis is providing these individuals with a free, two-year membership in Experian IdentityWorks. In addition, Keolis informed the individuals how to implement a fraud alert and freeze or lock their credit accounts, and is providing affected individuals with a toll free telephone hotline and email to address any questions and concern they have.

Thank you for your attention to this matter. Please contact us if you have any questions or we can be of any assistance with this matter.

Very truly yours,

/s/ Cameron G. Shilling

Cameron G. Shilling

Enclosures

KEOLIS

Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

November 10, 2020

F9528-L01-0000001 T00001 P001 *****MIXED AADC



SAMPLE A SAMPLE
APT 123
123 ANY ST
ANYTOWN, US 12345-6789



Dear Sample A Sample:

We are writing to inform you about a data security breach experienced by Keolis Commuter Services (“Keolis” or “Company”) affecting some of our employees and potentially some dependents of employees. This incident involved the potential compromise of personally identifiable information (“PII”), in the form of social security number (“SSN”) and driver’s license number. As a result, Keolis is providing you and potentially affected dependents with two years of complimentary Experian IdentityWorks identity and credit protection services, which are described further below. ***If an adult or minor dependent was affected, that individual will receive a letter addressed to the dependent, in addition to this letter sent to you.*** We encourage you to review this letter, promptly enroll in the IdentityWorks program, and call (833) 327-5932 or send an email to inquiries@keoliscs.com if you have any questions.

What Happened? On Saturday, October 10, 2020, Keolis experienced a ransomware event. The Company’s advanced threat detection system alerted us to the situation, and we deactivated our network within a few hours. Keolis immediately notified law enforcement, and hired an outside computer security forensic expert to help investigate and remediate. With the help of the expert, and the diligence of our own Digital Solutions team, the Company had restored the network to normal operations by Tuesday, October 13, 2020. Fortunately, this event did not, and will not, impact the continued safe operations of the MBTA Commuter Rail.

On Thursday, October 15, 2020, Keolis discovered that some employee information had been exported from our network during the ransomware incident. As a result, you may recall that, on Friday, October 16, 2020, the Company informed all employees about the matter.

Our forensic expert and Digital Solutions team immediately investigated further. Based on that investigation, Keolis believes that one or more files containing information about some of our employees was compromised in the incident. Further, although Keolis does not have specific information that employee dependent information was actually compromised, a file with such information was maintained in a location within the IT infrastructure which may have been compromised. Accordingly, the Company is providing you and potentially affected dependents with this further notice, and encouraging you to enroll yourself and those potentially affected dependents in the identity and credit protection services described below.

000001



What Information Was Affected? The file(s) that Keolis believes may have been compromised contained the following types of information about some of our employees and potentially some of their dependents: name; address; relationship of dependent(s) to employee; age and date of birth of employee and dependent(s); SSNs of employee and dependent(s); driver's license number of certain employees; and medical approval or disqualification for a position of certain employees. The Company is not aware that the file(s) contained information about all employees and dependents or that the file(s) contained all such information about the individuals whose names were in the file(s). Nonetheless, Keolis is providing all current and former employees, together with the dependents listed in the potentially compromised file(s), with this notice, as well as credit and identity protection services. Again, if an adult or minor dependent was affected, that individual will receive a letter addressed to the dependent, in addition to this letter sent to you.

What Should You Do? Protecting yourself and your family's credit and identity is important, no matter whether you know that you have been affected by a security incident or not. An identity and credit protection program is one of the tools you can and should use to do so.

Keolis is offering you and potentially affected dependents complimentary two-year membership in Experian's IdentityWorks program. This program affords you and those dependents both identity and credit monitoring as well as services to resolve any identity or credit fraud that may occur. To activate your memberships please follow these steps:

- Enroll by **February 28, 2021**. Your code will not be effective after that date.
- Visit the Experian IdentityWorks website: <https://www.experianidworks.com/credit>
- Provide the information requested and the following code: **ABCDEFGHI**. *Please use this code only for yourself. Any potentially affected adult or minor dependent will receive a code specific to that individual.*

If you have questions about IdentityWorks, or if you need assistance with enrolling or with identity or credit issues, please contact Experian at (833) 327-5932 by no later than February 28, 2021. Please be prepared to provide engagement number ENGAGE# as proof of eligibility for the IdentityWorks identity and credit protection services.

You will not need to provide a credit card for enrollment in IdentityWorks, since Keolis is paying for these services. You can contact Experian *immediately* to enroll or discuss any identity or credit issues, and you will have access to the following features once you enroll:

- Experian credit report
- Credit monitoring that actively monitors Experian file for indicators of fraud
- Identity Restoration agents to help you address any identity or credit fraud
- Identity theft insurance that provides coverage identity and credit fraud.¹

Keolis strongly encourages you to promptly use the foregoing information to enroll yourself and potentially affected dependents in the Experian IdentityWorks program.

¹ Identity theft insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

What Else Could You Do? In addition to enrolling in IdentityWorks, other measures you could take if you feel that you need to protect yourself or your dependents are: (1) obtain credit reports from www.annualcreditreport.com, inspect them for any potentially fraudulent activity, and notify the creditor if fraudulent; and (2) either implement a 90-day fraud alert or freeze/lock for your and your family's files with each credit bureau. You are entitled to inspect your credit reports, and implement a fraud alert or freeze/lock for your accounts without charge. If you would like to do so, the following is the contact information for the three major credit bureaus:

Equifax
866-349-5191
www.equifax.com
P.O. Box 740241
Atlanta, GA 30374

Experian
888-397-3742
www.experian.com
P.O. Box 4500
Allen, TX 75013

TransUnion
800-888-4213
www.transunion.com
P.O. Box 1000
Chester, PA 19016

Keolis has reported this matter to the Department of Homeland Security ("DHS"). Under certain laws, you may have a right to obtain a copy of a police report, if any exists. If you would like to do so, please contact DHS at (617) 274-5557. Also, if you feel you have experienced identity or credit fraud or otherwise want to contact law enforcement about this matter, Keolis encourages you to contact your state or local police department.

What Is Keolis Doing? In addition to providing complimentary identity and credit protection services, Keolis has taken measures to reduce the risk that this type of incident does not reoccur. For example, the Company has deployed additional threat detection software, mandated password changes, is replacing certain hardware within the IT environment, created geolocation restrictions associated with remote access and is evaluating further technical monitoring options.

For More Information. If you have any questions, please call (833) 327-5932 or send an email to inquiries@keoliscs.com. We apologize for any concern or inconvenience this situation may cause, and thank you for your continued service and loyalty to Keolis.

Sincerely,



David Scorey
CEO & General Manager
Keolis Commuter Services





Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

November 10, 2020

F9528-L02-0000002 T00001 P001 *****MIXED AADC



SAMPLE A SAMPLE
APT 123
123 ANY ST
ANYTOWN, US 12345-6789



Re: Notice of Data Security Breach

Dear Sample A Sample:

We are writing to inform you about a data security breach experienced by Keolis Commuter Services (“Keolis” or “Company”) affecting some of our employees and potentially some dependents of employees. You are receiving this letter because you are a potentially affected dependent of a Keolis employee. This incident involved the potential compromise of personally identifiable information (“PII”), in the form of social security number (“SSN”). As a result, Keolis is providing you with two years of complimentary Experian IdentityWorks identity and credit protection services, which are described further below. We encourage you to review this letter, promptly enroll in the IdentityWorks program, and call (833) 327-5932 or send an email to inquiries@keoliscs.com if you have any questions.

What Happened? On Saturday, October 10, 2020, Keolis experienced a ransomware event. The Company’s advanced threat detection system alerted us to the situation, and we deactivated our network within a few hours. Keolis immediately notified law enforcement, and hired an outside computer security forensic expert to help investigate and remediate. With the help of the expert, and the diligence of our own Digital Solutions team, the Company had restored the network to normal operations by Tuesday, October 13, 2020. Fortunately, this event did not, and will not, impact the continued safe operations of the MBTA Commuter Rail.

On Thursday, October 15, 2020, Keolis discovered that some employee information had been exported from our network during the ransomware incident. As a result, you may recall that, on Friday, October 16, 2020, the Company informed all employees about the matter.

Our forensic expert and Digital Solutions team immediately investigated further. Based on that investigation, Keolis believes that one or more files containing information about some of our employees was compromised in the incident. Further, although Keolis does not have specific information that employee dependent information was actually compromised, a file with such information was maintained in a location within the IT infrastructure which may have been compromised. Accordingly, the Company is providing you with this notice, and encouraging you to enroll yourself in the identity and credit protection services described below.

000002



What Information Was Affected? The file(s) that Keolis believes may have been compromised contained the following types of information about dependents: name; address; relationship to employee; age; date of birth; and SSN. The Company is not aware that the file(s) contained information about all dependents or that the file(s) contained all such information about the dependents whose names were in the file(s). Nonetheless, Keolis is providing all dependents listed in the potentially compromised file(s) with this notice, as well as credit and identity protection services.

What Should You Do? Protecting yourself and your family's credit and identity is important, no matter whether you know that you have been affected by a security incident or not. An identity and credit protection program is one of the tools you can and should use to do so.

Keolis is offering you a complimentary two-year membership in Experian's IdentityWorks program. This program affords you both identity and credit monitoring as well as services to resolve any identity or credit fraud that may occur. To activate your memberships please follow these steps:

- Enroll by **February 28, 2021**. Your code will not be effective after that date.
- Visit the Experian IdentityWorks website: <https://www.experianidworks.com/credit>
- Provide the information requested and the following code: **ABCDEFGHI**. *Please use this code only for yourself. Any potentially affected adult or minor dependent will receive a code specific to that individual.*

If you have questions about IdentityWorks, or if you need assistance with enrolling or with identity or credit issues, please contact Experian at (833) 327-5932 by no later than February 28, 2021. Please be prepared to provide engagement number ENGAGE# as proof of eligibility for the IdentityWorks identity and credit protection services.

You will not need to provide a credit card for enrollment in IdentityWorks, since Keolis is paying for these services. You can contact Experian *immediately* to enroll or discuss any identity or credit issues, and you will have access to the following features once you enroll:

- Experian credit report
- Credit monitoring that actively monitors Experian file for indicators of fraud
- Identity Restoration agents to help you address any identity or credit fraud
- Identity theft insurance that provides coverage identity and credit fraud.¹

Keolis strongly encourages you to promptly use the foregoing information to enroll yourself in the Experian IdentityWorks program.

¹ Identity theft insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

What Else Could You Do? In addition to enrolling in IdentityWorks, other measures you could take if you feel that you need to protect yourself or your dependents are: (1) obtain credit reports from www.annualcreditreport.com, inspect them for any potentially fraudulent activity, and notify the creditor if fraudulent; and (2) either implement a 90-day fraud alert or freeze/lock for your and your family's files with each credit bureau. You are entitled to inspect your credit reports, and implement a fraud alert or freeze/lock for your accounts without charge. If you would like to do so, the following is the contact information for the three major credit bureaus:

Equifax	Experian	TransUnion
866-349-5191	888-397-3742	800-888-4213
www.equifax.com	www.experian.com	www.transunion.com
P.O. Box 740241	P.O. Box 4500	P.O. Box 1000
Atlanta, GA 30374	Allen, TX 75013	Chester, PA 19016

Keolis has reported this matter to the Department of Homeland Security ("DHS"). Under certain laws, you may have a right to obtain a copy of a police report, if any exists. If you would like to do so, please contact DHS at (617) 274-5557. Also, if you feel you have experienced identity or credit fraud or otherwise want to contact law enforcement about this matter, Keolis encourages you to contact your state or local police department.

What Is Keolis Doing? In addition to providing complimentary identity and credit protection services, Keolis has taken measures to reduce the risk that this type of incident does not reoccur. For example, the Company has deployed additional threat detection software, mandated password changes, is replacing certain hardware within the IT environment, created geolocation restrictions associated with remote access and is evaluating further technical monitoring options.

For More Information. If you have any questions, please call (833) 327-5932 or send an email to inquiries@keoliscs.com. We apologize for any concern or inconvenience this situation may cause, and thank you for your continued service and loyalty to Keolis.

Sincerely,



David Scorey
CEO & General Manager
Keolis Commuter Services





Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

November 10, 2020

F9528-L03-0000003 T00001 P001 *****MIXED AADC



SAMPLE A SAMPLE
APT 123
123 ANY ST
ANYTOWN, US 12345-6789



Re: Notice of Data Security Breach

Dear Parent or Guardian of Sample A Sample:

We are writing to inform you about a data security breach experienced by Keolis Commuter Services (“Keolis” or “Company”) affecting some of our employees and potentially some dependents of employees. You are receiving this letter because you are the parent or guardian of a potentially affected minor dependent. This incident involved the potential compromise of personally identifiable information (“PII”), in the form of social security number (“SSN”). As a result, Keolis is providing your minor dependent with two years of complimentary Experian IdentityWorks identity and credit protection services, which are described further below. We encourage you to review this letter, promptly enroll your minor dependent in the IdentityWorks program, and call (833) 327-5932 or send an email to inquiries@keoliscs.com if you have any questions.

What Happened? On Saturday, October 10, 2020, Keolis experienced a ransomware event. The Company’s advanced threat detection system alerted us to the situation, and we deactivated our network within a few hours. Keolis immediately notified law enforcement, and hired an outside computer security forensic expert to help investigate and remediate. With the help of the expert, and the diligence of our own Digital Solutions team, the Company had restored the network to normal operations by Tuesday, October 13, 2020. Fortunately, this event did not, and will not, impact the continued safe operations of the MBTA Commuter Rail.

On Thursday, October 15, 2020, Keolis discovered that some employee information had been exported from our network during the ransomware incident. As a result, you may recall that, on Friday, October 16, 2020, the Company informed all employees about the matter.

Our forensic expert and Digital Solutions team immediately investigated further. Based on that investigation, Keolis believes that one or more files containing information about some of our employees was compromised in the incident. Further, although Keolis does not have specific information that employee dependent information was actually compromised, a file with such information was maintained in a location within the IT infrastructure which may have been compromised. Accordingly, the Company is providing you with this notice, and encouraging you to enroll your minor dependent in the identity and credit protection services described below.

000003



What Information Was Affected? The file(s) that Keolis believes may have been compromised contained the following types of information about dependents: name; address; relationship to employee; age; date of birth; and SSN. The Company is not aware that the file(s) contained information about all dependents or that the file(s) contained all such information about the dependents whose names were in the file(s). Nonetheless, Keolis is providing all dependents listed in the potentially compromised file(s) with this notice, as well as credit and identity protection services.

What Should You Do? Protecting yourself and your family's credit and identity is important, no matter whether you know that you have been affected by a security incident or not. An identity and credit protection program is one of the tools you can and should use to do so.

Keolis is offering your minor dependent a complimentary two-year membership in Experian's IdentityWorks program. This program affords your minor dependent both identity and credit monitoring as well as services to resolve any identity or credit fraud that may occur. To activate your minor dependent's membership please follow these steps:

- Enroll by **February 28, 2021**. Your code will not be effective after that date.
- Visit the Experian IdentityWorks website: <https://www.experianidworks.com/minorplus>
- Provide the information requested and the following code: **ABCDEFGHIL**. *Please use this code only for yourself. Any potentially affected adult or minor dependent will receive a code specific to that individual.*
- Provide your minor dependent's information as prompted.

If you have questions about IdentityWorks, or if you need assistance with enrolling or with identity or credit issues, please contact Experian at (833) 327-5932 by no later than February 28, 2021. Please be prepared to provide engagement number ENGAGE# as proof of eligibility for the IdentityWorks identity and credit protection services.

You will not need to provide a credit card for enrollment in IdentityWorks, since Keolis is paying for these services. You can contact Experian *immediately* to enroll or discuss any identity or credit issues, and you will have access to the following features once you enroll:

- Monitoring to determine whether your minor dependent has an Experian credit report. Alerts of all names, aliases, and addresses that become associated with your minor dependent's SSN on the Experian credit report.
- Technology searches Internet to identify trading or selling of your minor dependent's personal information, including on the dark web.
- Identity restoration agents to help address any identity or credit fraud.
- Identity theft insurance that provides coverage identity and credit fraud.¹

Keolis strongly encourages you to promptly use the foregoing information to enroll your minor dependent in the Experian IdentityWorks program.

¹ Identity theft insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

What Else Could You Do? In addition to enrolling in IdentityWorks, other measures you could take if you feel that you need to protect yourself or your dependents are: (1) obtain credit reports from www.annualcreditreport.com, inspect them for any potentially fraudulent activity, and notify the creditor if fraudulent; and (2) either implement a 90-day fraud alert or freeze/lock for your and your family's files with each credit bureau. You are entitled to inspect credit reports, and implement a fraud alert or freeze/lock without charge. If you would like to do so, the following is the contact information for the three major credit bureaus:

Equifax
866-349-5191
www.equifax.com
P.O. Box 740241
Atlanta, GA 30374

Experian
888-397-3742
www.experian.com
P.O. Box 4500
Allen, TX 75013

TransUnion
800-888-4213
www.transunion.com
P.O. Box 1000
Chester, PA 19016

Keolis has reported this matter to the Department of Homeland Security ("DHS"). Under certain laws, you may have a right to obtain a copy of a police report, if any exists. If you would like to do so, please contact DHS at (617) 274-5557. Also, if you feel you have experienced identity or credit fraud or otherwise want to contact law enforcement about this matter, Keolis encourages you to contact your state or local police department.

What Is Keolis Doing? In addition to providing complimentary identity and credit protection services, Keolis has taken measures to reduce the risk that this type of incident does not reoccur. For example, the Company has deployed additional threat detection software, mandated password changes, is replacing certain hardware within the IT environment, created geolocation restrictions associated with remote access and is evaluating further technical monitoring options.

For More Information. If you have any questions, please call (833) 327-5932 or send an email to inquiries@keoliscs.com. We apologize for any concern or inconvenience this situation may cause, and thank you for your continued service and loyalty to Keolis.

Sincerely,



David Scorey
CEO & General Manager
Keolis Commuter Services

