

# NORTON ROSE FULBRIGHT

January 15, 2021

Norton Rose Fulbright US LLP  
799 9th Street NW  
Suite 1000  
Washington, DC 20001-4501  
United States

Via: Certified Mail

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

Direct line +1 202 662 4691  
chris.cwalina@nortonrosefulbright.com

Tel +1 202 662 0200  
Fax +1 202 662 4643  
nortonrosefulbright.com

RECEIVED

JAN 19 2021

CONSUMER PROTECTION

**Re: *Legal Notice of Information Security Incident***

Dear Sir or Madam:

I am writing on behalf of my client, the Krapf Group ("Krapf"), to inform you that Krapf was the target of a cybersecurity attack that impacted the personal information of approximately 1 New Hampshire resident. Our review of the incident is ongoing, and we may provide a supplemental notice based on additional findings.

On November 23, 2020, Krapf discovered it was targeted by an attack in which an unauthorized actor gained access to Krapf's environment and downloaded a ransomware file on select Krapf systems. Once the incident was discovered, Krapf retained a leading cybersecurity forensics firm, Crypsis, to help conduct a thorough investigation of the incident. The root cause of the incident is currently under investigation, although at this time Crypsis is analyzing possible evidence of phishing. Based on the evidence thus far, we believe that the dates of unauthorized access to Krapf's systems occurred between November 17 to November 25, 2020.

There is no current evidence that the ransomware's encryption function was executed, however, Crypsis identified evidence that the unauthorized actor exfiltrated certain data that includes payroll and finance records. Krapf has reviewed the exfiltrated data to locate any personal information included in these files. On December 16, 2020, we determined that certain personal information of the New Hampshire resident was included in the impacted data, including payroll details such as Social Security number.

To be clear, the investigation is ongoing and additional notifications may be required as the investigation continues. Nonetheless, we wanted to provide Krapf impacted employees and former employees notice as soon as we learned their personal information had been compromised.

At this point, we are not aware of any fraud or misuse of any personal information as a result of this incident. We have no evidence that personal information was targeted by the threat actor for identity theft purposes, but rather, because ransomware files had been downloaded from the threat actor, we believe such information happened to be included in documents taken by the threat actor as part of a potential ransomware attack to extort the company.

Norton Rose Fulbright US LLP is a limited liability partnership registered under the laws of Texas.

Norton Rose Fulbright US LLP, Norton Rose Fulbright LLP, Norton Rose Fulbright Australia, Norton Rose Fulbright Canada LLP and Norton Rose Fulbright South Africa Inc are separate legal entities and all of them are members of Norton Rose Fulbright Verein, a Swiss verein. Norton Rose Fulbright Verein helps coordinate the activities of the members but does not itself provide legal services to clients. Details of each entity, with certain regulatory information, are available at [nortonrosefulbright.com](http://nortonrosefulbright.com).

January 15, 2021

Page 2

Through Crypsis' engagement, Krapf has deployed an endpoint security platform to contain any threats in connection with this attack. Further, Krapf is assessing security controls and will be implementing additional protocols to improve security and protect its network, email environment, systems, and personal information

We will notify the affected New Hampshire resident by mail this week and will be offering them 12 months of complimentary credit monitoring and fraud protection services. A copy of the notice letter is attached.

If you have any questions or need further information regarding this incident, please do not hesitate to contact me.

Respectfully submitted,



Chris Cwalina

STATE OF NH  
DEPT OF JUSTICE  
2021 JAN 19 PM 1:57



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

January 15, 2021

G1215-L01-0000001 T00017 P003 \*\*\*\*\*ALL FOR AADC 123



SAMPLE A SAMPLE - L01  
APT ABC  
123 ANY ST  
ANYTOWN, US 12345-6789



Dear Sample A Sample:

The Krapf Group and its affiliates (“Krapf”) was recently the victim of a cybersecurity attack. We are writing to let you know how this incident may have affected your personal information and, as a precaution, to provide steps you can take to help protect your information. We take the privacy and security of your personal information very seriously and we sincerely regret any concern this incident may cause you.

***What Happened***

On November 23, 2020, Krapf discovered it was targeted by an attack by which an unauthorized actor gained access to Krapf’s network. Once the incident was discovered, Krapf retained a leading cybersecurity forensics firm to help contain the incident and conduct a thorough investigation. The investigation is ongoing, however, as of the date of this letter the investigation revealed that the unauthorized actor accessed Krapf’s network on or around November 17, 2020, then exfiltrated a subset of data from Krapf’s network, which included some of your personal information. At this point, we are not aware of any fraud or misuse of any of your personal information as a result of this incident, but we are notifying you out of an abundance of caution.

***What Information Was Involved***

The exfiltrated records include personal information such as name, date of birth, address and payroll details such as your Social Security number.

***What We Are Doing***

We have reviewed our system with cybersecurity experts to confirm that there are no additional threats to our environment or your information. To help prevent a similar type of incident from occurring in the future, we are assessing and implementing additional security protocols designed to protect our network, email environment, systems, and data.



## ***What You Can Do***

Please review the "Information About Identity Theft Protection" reference guide, enclosed here, which describes additional steps you may take to help protect yourself, including recommendations from the Federal Trade Commission regarding identity theft protection and details regarding placing a fraud alert or a security freeze on your credit file. As an added precaution, to help protect your identity, we are offering a complimentary one-year membership of Experian's® IdentityWorksSM. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you enroll by: April 30, 2021 (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your activation code: ABCDEFGHI

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 855-662-8108 by April 30, 2021. Be prepared to provide engagement number ENGAGE# as proof of eligibility for the identity restoration services by Experian.

You should carefully review your account statements and credit reports for suspicious activity, accounts you did not open, or inquiries from creditors you did not initiate. You should remain vigilant and continue to monitor your statements for unusual activity going forward. If you see anything you do not understand on your credit report, call the credit agency immediately. If you find any suspicious activity on your statements or credit reports, call your local police or sheriff's office, file a police report for identity theft and get a copy of it. You may need to give copies of the police report to creditors to clear up your records.

## ***For More Information***

The security of your personal information is important to us and we sincerely regret that this incident occurred. For more information, or if you have any questions or need additional information, please contact 855-662-8108. Please be prepared to use this engagement number ENGAGE#.

Sincerely,



Blake A. Krapf  
Chief Executive Officer

## Information About Identity Theft Protection Guide

Contact information for the three nationwide credit reporting companies is as follows:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
Phone: 1-800-685-1111 P.O. Box 740256 Atlanta, Georgia 30348 www.equifax.com	Phone: 1-888-397-3742 P.O. Box 9554 Allen, Texas 75013 www.experian.com	Phone: 1-888-909-8872 P.O. Box 105281 Atlanta, GA 30348-5281 www.transunion.com

**Free Credit Report.** We remind you to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's ("FTC") website at [www.consumer.ftc.gov](http://www.consumer.ftc.gov)) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

**For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents:**

You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

**Security Freeze.** Security freezes, also known as credit freezes, restrict access to your credit file, making it harder for identity thieves to open new accounts in your name. You can freeze and unfreeze your credit file for free. You also can get a free freeze for your children who are under 16. If you are someone's guardian, conservator or have a valid power of attorney, you can get a free freeze for that person, too.

How will these freezes work? Contact all three of the nationwide credit reporting agencies – Equifax, Experian, and TransUnion. If you request a freeze online or by phone, the agency must place the freeze within one business day. If you request a lift of the freeze, the agency must lift it within one hour. If you make your request by mail, the agency must place or lift the freeze within three business days after it gets your request. You also can lift the freeze temporarily without a fee.

Don't confuse freezes with locks. They work in a similar way, but locks may have monthly fees. If you want a free freeze guaranteed by federal law, then opt for a freeze, not a lock.



The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue.

**For New Mexico residents:** You may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

**For Colorado and Illinois residents:** You may obtain information from the credit reporting agencies and the FTC about security freezes.

**Fraud Alerts.** A fraud alert tells businesses that check your credit that they should check with you before opening a new account. As of September 18, 2018 when you place a fraud alert, it will last one year, instead of 90 days. Fraud alerts will still be free and identity theft victims can still get an extended fraud alert for seven years.

**For Colorado and Illinois residents:** You may obtain additional information from the credit reporting agencies and the FTC about fraud alerts.

**Federal Trade Commission and State Attorneys General Offices.** If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your home state. You may also contact these agencies for information on how to prevent or avoid identity theft. You may contact the Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, [www.ftc.gov/bcp/edu/microsites/idtheft/](http://www.ftc.gov/bcp/edu/microsites/idtheft/), 1-877-IDTHEFT (438-4338).

**For Maryland Residents:** You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, [www.oag.state.md.us](http://www.oag.state.md.us), 1-888-743-0023.

**For North Carolina residents:** You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, [www.ncdoj.gov](http://www.ncdoj.gov), 1-877-566-7226.

**For Rhode Island Residents:** You may contact the Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, <http://www.riag.ri.gov>, 401-274-4400

#### **Reporting of identity theft and obtaining a police report.**

You have the right to obtain any police report filed in the United States in regard to this incident. If you are the victim of fraud or identity theft, you also have the right to file a police report.

**For Iowa residents:** You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

**For Massachusetts residents:** You have the right to obtain a police report if you are a victim of identity theft. You also have a right to file a police report and obtain a copy of it.

**For Oregon residents:** You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.

**For Rhode Island residents:** You have the right to file or obtain a police report regarding this incident.