

James J. Giszczak  
Direct Dial: 248.220.1354  
jgiszczak@mcdonalddhopkins.com

December 6, 2018

RECEIVED  
DEC 11 2018  
CONSUMER PROTECTION

**VIA U.S. MAIL**

Attorney General Gordon MacDonald  
Office of the New Hampshire Attorney General  
33 Capitol Street  
Concord, NH 03301

**Re: Luzerne Bank – Incident Notification**

Dear Attorney General MacDonald:

McDonald Hopkins PLC represents Luzerne Bank. I am writing to provide notification of an incident at Luzerne Bank that may affect the security of personal information of approximately four (4) New Hampshire residents. Luzerne Bank's investigation is ongoing and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, Luzerne Bank does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Luzerne Bank recently learned that an unauthorized individual may have obtained access to a Luzerne Bank email account between September 13, 2018 and September 18, 2018. Luzerne Bank immediately launched an investigation in consultation with outside cybersecurity professionals who regularly investigate and analyze these types of situations to analyze the extent of any compromise of the email account and the security of the emails and attachments contained within it. Luzerne Bank devoted considerable time and effort to determine what information was contained in the affected email account. Based on its comprehensive investigation and document review, which concluded on November 8, 2018, Luzerne Bank discovered that the compromised email account contained the residents' full names and Social Security numbers.

To date, Luzerne Bank is not aware of any reports of identity fraud or improper use of the information as a direct result of this incident. Nevertheless, Luzerne Bank wanted to make you (and the affected residents) aware of the incident and explain the steps that it is taking to help safeguard the residents against identity fraud. Luzerne Bank will provide the residents with written notice of this incident commencing on or about December 7, 2018 in substantially the same form as the letter attached hereto. Luzerne Bank will provide dedicated call center support to answer the affected residents' questions. Additionally, it will offer the residents a one-year

December 6, 2018

Page 2

complimentary membership with a credit monitoring and identity theft protection service. Luzerne Bank will advise the residents to remain vigilant in reviewing financial account statements for fraudulent or irregular activity. Luzerne Bank will also advise the residents about the process for placing a fraud alert and/or security freeze on their credit files, and obtaining a free credit report. The residents also will be provided with the contact information for the consumer reporting agencies and the Federal Trade Commission.

Luzerne Bank is committed to maintaining the privacy of personal information in its possession and has taken many precautions to safeguard it. Luzerne Bank continually evaluates and modifies its practices and internal controls to enhance the security and privacy of personal information.

Should you have any questions regarding this notification, please contact me at (248) 220-1354 or [jgiszczak@mcdonaldhopkins.com](mailto:jgiszczak@mcdonaldhopkins.com).

Sincerely,



James J. Giszczak

Encl.

# LUZERNE BANK



**IMPORTANT INFORMATION  
PLEASE REVIEW CAREFULLY**

Dear [REDACTED]

I am writing with important information regarding a recent security incident. The privacy and security of the personal information we maintain is of the utmost importance to Luzerne Bank. We wanted to provide you with information about the incident, explain the services we are making available to you, and let you know that we continue to take significant measures to protect your information.

We recently learned that an unauthorized individual may have obtained access to a Luzerne Bank email account between September 13, 2018 and September 18, 2018. We immediately launched an investigation in consultation with outside cybersecurity professionals who regularly investigate and analyze these types of situations to analyze the extent of any compromise of the email account and the security of the emails and attachments contained within it.

We devoted considerable time and effort to determine what information was contained in the affected email account. Based on our comprehensive investigation and document review, which concluded on November 8, 2018, we discovered that the compromised email account contained your full name and Social Security number.

To date, we are not aware of any reports of identity fraud or improper use of your information as a direct result of this incident. Out of an abundance of caution, we wanted to make you aware of the incident, explain the services we are making available to help safeguard you against identity fraud, and suggest steps that you should take as well. To protect you from potential misuse of your information, we are providing you with a one-year membership in myTrueIdentity provided by TransUnion Interactive, a subsidiary of TransUnion. For more information on identity theft prevention and myTrueIdentity, including instructions on how to activate your one-year membership, please see the additional information provided in this letter.

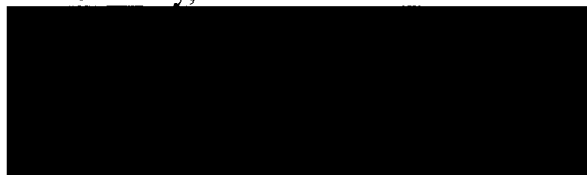
This letter also provides other precautionary measures you can take to protect your personal information, including placing a Fraud Alert and/or Security Freeze on your credit files, and/or obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis.

Please accept our apology that this incident occurred. We are committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices and internal controls to enhance the security and privacy of your personal information.

**If you have any further questions regarding this incident, please call our dedicated and confidential toll-free response line that we have set up to respond to questions at [REDACTED].** This response line is staffed

with professionals familiar with this incident and knowledgeable on what you can do to protect against misuse of your information. The response line is available Monday through Friday. [REDACTED]

Sincerely,



Luzerne Bank

– OTHER IMPORTANT INFORMATION –

**1. Enrolling in Complimentary 12-Month Credit Monitoring.**

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (myTrueIdentity) for one year provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies.

To enroll in this service, go to the myTrueIdentity website at [REDACTED] and in the space referenced as “Enter Activation Code”, enter the following 12-letter Activation Code [REDACTED] and follow the three steps to receive your credit monitoring service online within minutes.

You can sign up for the online credit monitoring service anytime between now and [REDACTED]. Due to privacy laws, we cannot register you directly. Please note that credit monitoring service might not be available for individuals who do not have a credit file with TransUnion, or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

Once you are enrolled, you will be able to obtain one year of unlimited access to your TransUnion credit report and credit score. The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The service also includes access to an identity restoration program that provides assistance in the event your identity is compromised to help you restore your identity and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

If you believe you may be a victim of identity theft, please call the toll-free TransUnion Fraud Response Services hotline at [REDACTED]. When prompted, enter the following 6-digit telephone pass code [REDACTED] to speak to a TransUnion representative about your identity theft issue.

**2. Placing a Fraud Alert on Your Credit File.**

Whether or not you choose to use the complimentary 12 month credit monitoring services, we recommend that you place an initial 90-day “Fraud Alert” on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

**Equifax**  
P.O. Box 105069  
Atlanta, GA 30348  
[www.equifax.com](http://www.equifax.com)  
1-800-525-6285

**Experian**  
P.O. Box 2002  
Allen, TX 75013  
[www.experian.com](http://www.experian.com)  
1-888-397-3742

**TransUnion LLC**  
P.O. Box 2000  
Chester, PA 19016  
[www.transunion.com](http://www.transunion.com)  
1-800-680-7289

**3. Consider Placing a Security Freeze on Your Credit File.**

If you are very concerned about becoming a victim of fraud or identity theft, you may request a “Security Freeze” be placed on your credit file, at no charge. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by contacting all three nationwide credit reporting companies at the numbers below and following the stated directions or by sending a request in writing, by mail, to all three credit reporting companies:

**Equifax Security Freeze**  
PO Box 105788  
Atlanta, GA 30348  
<https://www.freeze.equifax.com>  
1-800-349-9960

**Experian Security Freeze**  
PO Box 9554  
Allen, TX 75013  
<http://experian.com/freeze>  
1-888-397-3742

**TransUnion Security Freeze**  
P.O. Box 2000  
Chester, PA 19016  
<http://www.transunion.com/securityfreeze>  
1-888-909-8872

In order to place the security freeze, you'll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name or to commit fraud or other crimes against you, you may file a police report in the City in which you currently reside.

If you do place a security freeze *prior* to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

#### **4. Obtaining a Free Credit Report.**

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at **[www.annualcreditreport.com](http://www.annualcreditreport.com)**. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

#### **5. Additional Helpful Resources.**

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft), by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.