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MCLANE MIDDLETON

May 24, 2022

RECEIVED
MAY 25 2022
CONSUMER PROTECTION

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

Re: Data Security Incident

To whom it may concern,

McLane Middleton, P.A. represents the Town of Middleton, New Hampshire ("Town"), which has its principal place of business at 182 Kings Highway, Middleton, New Hampshire 03887. We are writing to inform you about a data security incident involving the Town that affects 43 residents of New Hampshire.

What Happened. The Town received a right to know act request for the compensation received by Town employees. When the Town's information system generated the list, it also contained the social security numbers (SSN) for each Town employee. The Town redacted the list to obscure SSNs. However, when the Town delivered the list on February 28, 2022 to the individual who had made the request, the Town accidentally delivered the unredacted version of the list containing SSNs of Town employees.

The Town discovered the error the next day, and immediately contacted the individual to whom it had delivered the list. That individual returned the list to the Town, and has provided the Town with written assurances that the individual did not retain a copy of the unredacted list or the SSNs on it, and did not use or disclose any of the SSNs on the list. As a result, the Town has no reason to believe that the SSNs of Town employees were compromised by this incident.

What Was Done for Affected Individuals: The Town has sent notification letters to all affected Town employees, has establish a call center to address any questions or concerns, and is offering credit and identity monitoring and restoration protection to all affected individuals. The notices were mailed on May 23, 2022, and a copy of the template is attached.

Thank you for your attention to this matter. Please do not hesitate to contact us if you have any questions.

Very truly yours,

/s/ Cameron G. Shilling

Cameron G. Shilling

Enclosure

Town of Middleton

182 Kings Highway, Middleton, New Hampshire 03887

May 23, 2022

Name
Address
Address

Re: Information Security Incident

Dear Name,

We are writing to inform you about an information security incident experience by the Town of Middleton that affected certain personally identifiable information about you. As a result of this incident, the Town is offering, and encouraging you to enroll in, the credit and identity protection services discussed below. If you have questions about or need help enrolling in those services, please call Experian directly at (833) 708-2890. If you have questions about this incident, please email bostom.rtk2022@gmail.com or call (603) 473-5202.

What Happened. The Town received a right to know act request for the compensation received by Town employees. Such a request is lawful, and the Town is required to produce that information. When the Town's information system generated the list, it also contained the social security numbers (SSN) for each Town employee. The Town redacted the list to obscure SSNs. However, when the Town delivered the list on February 28, 2022 to the individual who had made the right to know act request, the Town accidentally delivered the unredacted version of the list containing SSNs of Town employees.

The Town discovered the error the next day, and immediately contacted the individual to whom it had delivered the list. That individual returned the list to the Town, and has provided the Town with written assurances that the individual did not retain a copy of the unredacted list or the SSNs on it, and did not use or disclose any of the SSNs on that list. As a result, the Town has no reason to believe that your SSN was compromised by this incident.

What You Should Do. Out of an abundance of caution, and because this incident involves Town employees, the Town is offering – and encouraging you to enroll in – services that monitor your credit and identity, and help restore your credit and identity in the event of a compromise. The services are called IdentityWorks from Experian, and are free to you for 2 years.

To enroll in these services, please follow these steps.

- Ensure that you enroll by August 31, 2022. Your code will not work after this date.
- To enroll, visit the Experian website at https://www.experianidworks.com/credit, or call Experian directly at (833) 708-2890.
- Provide the following activation code: ***CODE.*** This code is unique to you, and cannot be used by any other person to enroll in these services.

If you have questions about these services, or need assistance enrolling or with identity or credit restoration services, please contact Experian at (833) 708-2890. If you do so, please be prepared to provide engagement number as a reference to this incident.

A credit card or other payment is not required for enrolling in IdentityWorks. You can contact Experian immediately regarding any concern you may have about your identity or credit, and have access to the following features once you enroll in IdentityWorks.

- Experian Credit Report: You will be able to monitor what information is associated with your credit file. Daily credit reports are available for online members only.
- Credit Monitoring: Actively monitors Experian file for indicators of fraud.
- Restoration: Credit and identity restoration specialists are immediately available to help you address any credit or identity fraud.
- Experian IdentityWorks ExtendCARE: You receive the same high-level of identity restoration support even after your IdentityWorks membership has expired.
- $1 Million Identity Theft Insurance: Provides coverage for certain costs and unauthorized electronic fund transfers.[1]

The Town also encourages you to review the information in the below "Steps You Can Take To Help Protect Your Information." To the extent you feel that any such measures are necessary to protect your credit or identity, the Town encourages you take them.

For More Information: If you have any questions about or need help with IdentityWorks or other Experian services, please call Experian at (833) 708-2890. If you have other questions, or would like to discuss this matter further with the Town, please send an email to bostom.rtk2022@gmail.com or call (603) 473-5202.

We apologize if this incident causes you any concern, and are sincerely grateful to you for your continued support and loyal service to the Town.

Sincerely,

Roxanne Tufts-Keegan

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

Steps You Can Take to Help Protect Your Information

Monitor Accounts

Under United States 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 877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report by using the following information.

Experian	TransUnion	Equifax
P.O. Box 9554	P.O. Box 160	P.O. Box 105788
Allen, TX 75013	Woodlyn, PA 19094	Atlanta, GA 30348-5788
1-888-397-3742	1-888-909-8872	1-800-685-1111
www.experian.com/freeze/center.html	www.transunion.com/credit-freeze	www.equifax.com/personal/credit-report-services

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 above.

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

- Full name (including middle initial as well as Jr., Sr., II, III, etc.)
- Social Security Number
- Date of birth
- If you have moved in the past five years, addresses where you have lived over the prior five years
- Proof of current address, such as a current utility bill or telephone bill
- A legible photocopy of a government-issued identification card
- 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" 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 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 using the information listed above.

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); 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.

California Residents: Visit the California Office of Privacy Protection (www.oag.ca.gov/privacy) for additional information on protection against identity theft. Kentucky Residents: Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov, Telephone: 1-502-696-5300. Maryland Residents: Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023. 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 a violator. 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. You can 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. 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; https://ag.ny.gov/. North Carolina Residents: Office of the Attorney General of North Carolina, Consumer Protection Division, 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 1-919-716-6400, 877-566-7226 (toll free within NC). Oregon Residents: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392. Rhode Island Residents: Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, Telephone: 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. Washington D.C. Residents: the Office of Attorney General for the District of Columbia can be reached at: 441 4thStreet NW, Suite 1100 South, Washington, D.C. 20001; 1-202-442-9828; https://oag.dc.gov. All US Residents: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, www.consumer.gov/idtheft, 1-877-IDTHEFT (438-4338), TTY: 1-866-653-4261.