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December 16, 2019

VIA E-MAIL

Gordon MacDonald, Attorney General
Consumer Protection and Antitrust Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
Email: DOJ-CPB@doj.nh.gov

Re: Notice of Data Security Incident

Dear Attorney General MacDonald:

We represent Millennium Healthcare Group (“Millennium”), a third-party benefits administrator located in Lederach, Pennsylvania. This letter is being sent on behalf of Millennium because personal information belonging to certain New Hampshire residents may have been affected by a recent data security incident experienced thereby. The incident may have involved unauthorized access to New Hampshire residents’ names and Social Security numbers.

On June 17, 2019, Millennium discovered unusual activity in its email system. Millennium immediately took measures to secure its system and launched an investigation with the assistance of a digital forensics firm to help determine what occurred and whether personal information was accessed or acquired without authorization as a result. The forensics investigation thereafter determined that one Millennium employee email account was accessed without authorization between June 14, 2019 and June 17, 2019. Upon learning this information, Millennium launched a data review project to analyze the impacted mailbox and determine whether that account contained personal information, which subsequently identified individuals whose personal information may have been impacted. Millennium then worked diligently to identify up-to-date address information required to notify potentially impacted individuals. On December 15, 2019, Millennium confirmed that the personal information of the above-referenced New Hampshire residents was contained in the impacted mailbox and therefore may have been accessed without authorization.

Millennium notified eleven (11) New Hampshire residents via the attached sample letter on December 16, 2019. Millennium is offering twelve (12) months of complimentary credit monitoring and identity protection services to the potentially affected residents through Kroll, including Credit Monitoring, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration. Please contact me should you have any questions.

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Sincerely,

/s/ Alyssa R. Watzman

Alyssa R. Watzman of
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure: Consumer Notification Letter



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

<<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

Notice of Data Security Incident

Dear <<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>,

We are writing to inform you of a data security incident experienced by Millennium Healthcare Group (“Millennium”) that may have affected your personal information.¹ As explained below, we recently learned that an unauthorized individual gained access to a Millennium employee email account containing your personal information. We are writing to notify you of this incident, to offer you complimentary credit monitoring services, and to inform you about steps that can be taken to help protect your personal information.

What Happened? On June 17, 2019, we detected unusual activity in a Millennium employee email account. We immediately took steps to secure the account and launched an investigation. In connection therewith, we engaged a leading, independent forensics firm to determine what happened and whether sensitive information was accessed or acquired without authorization. On September 4, 2019, our investigation determined that the impacted Millennium email account contained some of your personal information which may have been accessed by the unauthorized individual. Millennium then worked diligently through mid-November to identify up-to-date address information required to notify potentially impacted individuals.

Please note that this unauthorized access was limited to information transmitted via email and did not affect any other information systems.

What Information Was Involved? The following information may have been contained within the accessed email account: your <<ClientDef1(Impacted Data)>><<ClientDef2(Impacted Data)>>.

What We Are Doing. As soon as we discovered this incident, we took the measures referenced above. We also implemented enhanced security measures applicable to our email system in order to better safeguard all personal information in our possession and to help prevent a similar incident from occurring in the future. In addition, we reported this matter to the Federal Bureau of Investigation and will provide whatever assistance is necessary to hold the perpetrators of this incident accountable. Finally, we are offering you complimentary credit monitoring services through Kroll, a global leader in risk mitigation and response. These services include Credit Monitoring, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

What You Can Do. We recommend that you activate your complimentary Kroll services. Activation instructions and a description of the services being provided are included with this letter. We also recommend that you review the guidance included with this letter about how to protect your personal information.

For More Information. If you have questions or need assistance, please contact Kroll at 1-833-963-0525, Monday through Friday from 8 a.m. to 5:30 p.m. Central Time, excluding major US holidays. Kroll representatives are fully versed on this incident and can answer any questions you may have regarding the protection of your personal information.

¹ Millennium acts as a third-party benefits administrator for your current or former employer and was in possession of your personal information as a result of the services provided thereto. Millennium is located at 509 Salfordville Road, Unit 4, Lederach, Pennsylvania 19450.

Please accept our sincere apologies and know that we deeply regret any worry or inconvenience that this may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read "Sara Picard". The signature is fluid and cursive, with a large initial "S" and "P".

Sara Picard
President & CEO
Millennium

Steps You Can Take to Further Protect Your Information

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity

As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print this form at <https://www.annualcreditreport.com/cra/requestformfinal.pdf>. You also can contact one of the following three national credit reporting agencies:

TransUnion P.O. Box 1000 Chester, PA 19016 1-877-322-8228 www.transunion.com	Experian P.O. Box 9532 Allen, TX 75013 1-888-397-3742 www.experian.com	Equifax P.O. Box 105851 Atlanta, GA 30348 1-800-525-6285 www.equifax.com	Free Annual Report P.O. Box 105281 Atlanta, GA 30348 1-877-322-8228 annualcreditreport.com
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Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: You have the right to put a security freeze on your credit file. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. There is no charge to place, lift or remove the security freeze. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state. Residents of Maryland, North Carolina, and Rhode Island can obtain more information from their Attorneys General using the contact information below.

Federal Trade Commission 600 Pennsylvania Ave, NW Washington, DC 20580 consumer.ftc.gov , and www.ftc.gov/idtheft 1-877-438-4338	Maryland Attorney General 200 St. Paul Place Baltimore, MD 21202 oag.state.md.us 1-888-743-0023	North Carolina Attorney General 9001 Mail Service Center Raleigh, NC 27699 ncdoj.gov 1-877-566-7226	Rhode Island Attorney General 150 South Main Street Providence, RI 02903 http://www.riag.ri.gov 401-274-4400
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You also have certain rights under the Fair Credit Reporting Act (FCRA), including: to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information, as well as others. For more information about the FCRA, and your rights pursuant to the FCRA, please visit http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.

As referenced above, we have secured the services of Kroll to provide credit monitoring services at no cost to you for one year. 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 services include Credit Monitoring, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

How to Activate Your Services

Visit krollbreach.idMonitoringService.com to activate and take advantage of your identity monitoring services.

You have until **March 15, 2020** to activate your identity monitoring services.

Membership number: <<Member ID>>

If you have questions, please call 1-833-963-0525, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time.

Take Advantage of Your Services

You've been provided with access to the following services from Kroll²:

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'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

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.

\$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.

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 can dig deep to uncover the scope of the identity theft, and then work to resolve it.

² Kroll's activation website is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.