



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

STATE OF NH.
DEPT OF JUSTICE
2019 MAY -6 PM 12:00

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Wayne, PA 19087

April 30, 2019

***INTENDED FOR ADDRESSEE(S) ONLY
VIA U.S. 1st CLASS MAIL***

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Attorney General MacDonald:

Our office represents MMBB Financial Services located at 475 Riverside Drive, Suite 1700, New York, NY 10115-0049. We write to notify you of an event that may affect the security of personal information relating to one (1) New Hampshire resident. This notice may be supplemented if significant facts are learned subsequent to its submission. By providing this notice, MMBB Financial Services does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Background

In late September 2018, MMBB Financial Services discovered that an employee's email account was subject to unauthorized access. MMBB Financial Services' IT personnel discovered a mail forwarding rule set up in the employee's email account that was not set up by the user. Upon discovering the unauthorized access, MMBB Financial Services immediately changed the employee's password and commenced an internal investigation into the incident. On January 8, 2019, MMBB Financial Services also engaged a forensics expert to conduct a third-party forensic investigation. Through the investigation, MMBB Financial Services determined the employee's account was subject to unauthorized access from September 11, 2018 to September 17, 2018. Out of an abundance of caution, the investigator reviewed all of the emails in the compromised account to determine whether the emails contained any protected information. On February 22, 2019, MMBB Financial Services determined that one or more of the emails accessible in the account

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contained the following types of information related to one (1) New Hampshire resident: name, Social Security number and financial account information.

Notice to New Hampshire Residents

On April 30, 2019, MMBB Financial Services mailed written notices of this incident to all potentially impacted individuals. Written notice will be provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

MMBB Financial Services is offering individuals impacted by this event with access to one (1) year of complimentary credit monitoring and identity protection services through Experian. Additionally, MMBB Financial Services is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud, including information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state attorney general, and law enforcement to report attempted or actual identity theft and fraud. MMBB Financial Services is working to implement additional safeguards and employee training in response to this incident. In addition to providing this notice to your office, MMBB Financial Services is providing notice to other state regulators, as required.

Contact Information

Should you have any questions regarding this notification or other aspects of this event, please contact me at (267) 930-4798.

Very truly yours,



James E. Prendergast of
MULLEN COUGHLIN LLC

JEP:cds
Enclosure

EXHIBIT A



A Financial Services Ministry™

The Ministers and
Missionaries Benefit Board

Return Mail Processing
475 Riverside Drive, Suite 1700
New York, NY 10115-0049

April 30, 2019



E6238-L01-0123456
SAMPLE A SAMPLE - L01 Non MA Notice letter
APT 123
123 ANY ST
ANYTOWN, US 12345-6789

RE: Notice of Data Breach

Dear Sample A Sample:

MMBB Financial Services (“MMBB”) is writing to notify you of a recent data security incident that may impact the security of your personal information. MMBB writes to advise you of our investigation and the steps we are taking in response to this incident as well as steps you can take to protect your personal information should you feel it is appropriate to do so.

What Happened? In September 2018, MMBB discovered that an employee’s email account was subject to unauthorized access. MMBB’s IT personnel discovered a mail forwarding rule set up in the employee’s email account that was not set up by the user. Upon discovering the unauthorized access, MMBB immediately changed the employee’s password and commenced an internal investigation into the incident. MMBB also engaged a forensics expert to conduct a third-party forensic investigation. Through the investigation, MMBB has determined the employee’s account was subject to unauthorized access from September 11, 2018 to September 17, 2018. Out of an abundance of caution, the investigator reviewed all of the emails in the compromised account to determine whether the emails contained any protected information. On February 22, 2019, we determined that one or more of the emails accessible in the account contained sensitive information related to you.

What Information Was Involved? The information in the account that was potentially subject to unauthorized access includes your name , Exposed Data Element 1, Exposed Data Element 2, Exposed Data Element 3.

What We Are Doing. MMBB takes the security of personal information in our care very seriously. We have security measures in place to protect the data on our systems and we are working to implement additional safeguards. As an added precaution, we have arranged to have Experian protect your identity for 12 months at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next 12 months.

Please note that this offer is available to you for 12 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this website.

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While Identity Restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorksSM as a complimentary 12-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

Ensure that you enroll by: July 31, 2019 (Your code will not work after this date.)

Visit the Experian IdentityWorks website to enroll: www.ExperianIdWorks.com/credit

Provide your activation code: ABCDEFGHI

If you have questions about the product, need assistance with identity restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-890-9332 by July 31, 2019. Be prepared to provide engagement number DB12075 as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12 MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues and have access to the following features once you enroll in Experian IdentityWorks:

Experian credit report at signup: See 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.

Identity Restoration: Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.

Experian IdentityWorks ExtendCARETM: You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.

\$1 Million Identity Theft Insurance¹: Provides coverage for certain costs and unauthorized electronic fund transfers.

What You Can Do. You can enroll to receive the free credit monitoring and identity restoration services. You can also review the enclosed "Steps You Can Take to Protect Against Identity Theft and Fraud." In addition, we advise you to report suspected incidents of identity theft to local law enforcement or the Attorney General.

For More Information. We understand that you may have questions about this incident that may not be addressed in this letter. If you have additional questions or need assistance, please call our dedicated assistance line at 877-890-9332, Monday to Friday, 11:00 am ET to 8:00 pm ET.

We sincerely apologize for this incident and regret any concern or inconvenience this has caused you.

Sincerely,

MMBB Financial Services

¹ Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. 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 Protect Against Identity Theft and Fraud

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. 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, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

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 below:

Experian
PO Box 9554
Allen, TX 75013
1-888-397-3742
[www.experian.com/freeze/
center.html](http://www.experian.com/freeze/center.html)

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872
[www.transunion.com/
credit-freeze](http://www.transunion.com/credit-freeze)

Equifax
PO Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
[www.equifax.com/personal/
credit-report-services](http://www.equifax.com/personal/credit-report-services)

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your file 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 you are 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 listed below:

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

TransUnion
P.O. Box 2000
Chester, PA 19106
1-800-680-7289
[www.transunion.com/fraud-victim
-resource/place-fraud-alert](http://www.transunion.com/fraud-victim-resource/place-fraud-alert)

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
[www.equifax.com/personal/
credit-report-services](http://www.equifax.com/personal/credit-report-services)

Although we have no reason to believe that your personal information has been used to file fraudulent tax returns, you can contact the IRS at www.irs.gov/Individuals/Identity-Protection for helpful information and guidance on steps you can take to address a fraudulent tax return filed in your name and what to do if you become the victim of such fraud. You can also visit www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft for more 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); TTY: 1-866-653-4261.

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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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and www.oag.state.md.us. **For North Carolina residents**, the Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at www.ncdoj.gov.