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 **NORTON ROSE FULBRIGHT**

September 23, 2020

CONSUMER PROTECTION

Norton Rose Fulbright US LLP  
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United States

Via Certified Mail

Office of the Attorney General  
Attn: Security Breach Notification  
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*Re: Incident Notification*

Dear Sir or Madam:

I am writing on behalf of my client, National Fuel Gas Distribution Corporation ("National Fuel"), to provide notice of a security that occurred at a National Fuel third-party vendor, DiVal Safety Equipment Inc. ("DiVal").

DiVal provides qualification and processing services for several payment assistance programs offered to eligible National Fuel customers. National Fuel was recently notified by DiVal that DiVal was the target of a ransomware attack and that it had launched an investigation with assistance from a third party cybersecurity firm. National Fuel also launched its own investigation and worked with DiVal to determine whether any National Fuel customers' data may have been involved.

On August 28, 2020, DiVal provided findings from its investigation, which determined that the unauthorized party accessed certain DiVal systems between July 28, 2020 and July 30, 2020 before launching ransomware designed to encrypt data on DiVal's systems. According to DiVal, in cooperation with federal law enforcement, DiVal was able to recover data that the unauthorized party removed from DiVal's systems. The recovered data included information related to six National Fuel customers, none of whom are residents of New Hampshire. However, DiVal's investigation was unable to rule out the possibility that other data on the affected system may have been accessed or acquired by the unauthorized party. Therefore, out of an abundance of caution, DiVal and National Fuel conducted a thorough analysis to determine the scope of National Fuel customers' personal information potentially contained on the affected DiVal system. On September 8, 2020, National Fuel determined that the affected DiVal system may have contained the personal information of one (1) New Hampshire resident, including name, address, phone number, National Fuel account number, and Social Security number.

Today, out of an abundance of caution, National Fuel will begin sending notification letters via First Class Mail to the one (1) New Hampshire resident whose information was on the affected system. This notice is being provided in accordance with N.H. Rev. Stat. § 359-C:19 *et seq.* Enclosed is a sample copy of the letter. National Fuel is offering one year of complimentary credit monitoring and identity protection services to the individual as well as a toll free hotline for the individuals to call with any questions they may have.

To help prevent a similar incident from occurring in the future, DiVal has implemented several security enhancements to further protect its systems, network, and data, including an advanced endpoint detection and response tool as well as multi-factor authentication for remote access to email. In addition, National Fuel is continuing to work with DiVal to evaluate additional security

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measures to further protect National Fuel data. DiVal is also continuing to support law enforcement's investigation.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

Will Daugherty  
Partner

Enclosure