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OCT 21 2021

CONSUMER PROTECTION

October 20, 2021

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

Re: Data Security Breach

To whom it may concern,

McLane Middleton, Professional Association represents the New Hampshire Retirement System (“NHRS”), which is located at 54 Regional Drive, Concord, New Hampshire 03301. We are writing to inform you about a data security breach that has affected 1 individual, who is a resident of the State of New Hampshire.

What Happened: In late September 2021, NHRS learned that three NHRS members who attempted to submit information to NHRS’ MyAccount portal were erroneously presented with a document that was previously submitted by another member. NHRS deactivated the MyAccount portal while investigating and remediating the incident. NHRS discovered that the error was caused by an obscure feature embedded in the code of MyAccount. Specifically, under certain circumstances, MyAccount was causing some data to be cached. MyAccount had cached the document previously submitted by a member, and then presented it to the other member as a result of the particular circumstances in which they had submitted their information to MyAccount.

NHRS was surprised to learn that MyAccount cached any data, since the option for caching had previously been disabled. The caching at issue here occurred only because of an obscure line of code embedded in MyAccount. NHRS worked with, and has been assured by, the vendor of the MyAccount software that the application will no longer be able to cache data under any circumstances. Additionally, NHRS implemented another layer of protection in its Internet firewall, which similarly prevents any caching from MyAccount.

What Information Was Involved: The document previously submitted by the other member contained the first and last names and address of the member and her spouse, and the member’s maiden name. The document also contained the social security number (“SSN”) and date of birth of the member’s spouse, as her beneficiary.

What NHRS Is Doing: In addition to implementing multiple tiered controls to ensure that MyAccount is not caching any data, NHRS notified the affected member and her spouse of this

McLane Middleton, Professional Association
Manchester, Concord, Portsmouth, NH | Woburn, Boston, MA

McLane.com

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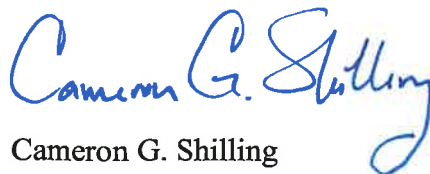
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incident (see enclosed letter), and has offered to pay for two years of identity and credit protection for the retiree's spouse.

Thank you for your attention to this matter. Please contact us if you have any questions or we can be of any assistance with this matter.

Very truly yours,

A handwritten signature in blue ink that reads "Cameron G. Shilling". The signature is written in a cursive style with a large, stylized "C" and "S".

Cameron G. Shilling

Enclosure



New Hampshire Retirement System
54 Regional Drive, Concord, NH 03301
Phone: (603) 410-3500 - Fax: (603) 410-3501
Website: www.nhrs.org - Email: info@nhrs.org

October 20, 2021

Via Encrypted Email and U.S. Mail

L S
W S
[Redacted]

Re: Data Security Incident

Dear Mr. and Mrs. S [Redacted],

I am writing to follow up my prior conversations with Mrs. S [Redacted] concerning a data security incident involving certain personal information about you. The incident involved the Application [Redacted] ("Application") that Mrs. S [Redacted] submitted on or about September [Redacted] 2021 through the My Account portal of New Hampshire Retirement System ("NHRS"). A copy of the Application is included with this letter for your review.

This incident was caused by an obscure feature embedded in the code of the My Account portal. Shortly after you submitted your Application, two other retirees' submitted information to NHRS through My Account. After doing so, My Account generated a confirmation for each of their submissions with a link for them to review the documents they had submitted. Rather than linking to the documents they submitted, the link presented your Application instead.

As soon as NHRS learned this occurred, I immediately contacted Mrs. S [Redacted], while our IT staff contacted the vendor from whom we had purchased My Account. Although it took some time to ascertain the cause of this situation, we were able to determine that the code in My Account was, under certain circumstances, causing some data to be "cached." Caching is when a computer stores data in temporary memory, without the user knowing or intended it to be saved in that way. In this situation, My Account cached your Application without you or NHRS knowing it was doing so, and then presented it to the two other retirees as a result of the particular circumstances in which they had submitted their information into My Account.

We understand that these types of technological issues can seem complex and confusing. Indeed, NHRS was surprised to learn that My Account cached any data, since the option of caching was already disabled. The caching at issue here occurred only because of an obscure line of code embedded in My Account. Please be assured that NHRS has already worked with, and been assured by, our vendor that My Account will no longer be able to cache data under any circumstances. Additionally, we have implemented another layer of protection in our Internet firewall, which similarly prevents any caching from My Account.

Our Mission: To Provide Secure Retirement Benefits and Superior Service

As you will see when you review the enclosed, the Application contained both of your first and last names, Mrs. S [REDACTED] maiden name, and your address. In addition, the Application contained Mr. S [REDACTED] social security number ("SSN") and date of birth, as Mrs. S [REDACTED] beneficiary. While names, addresses, and even birth dates are not particularly confidential or sensitive, we understand that Mr. S [REDACTED] SSN can be sensitive information.

Fortunately, NHRS is only aware that the two other retirees viewed your Application. Both of these individuals assured us that they did not download or print it, and that they did not and will not use the information on it. Indeed, neither recall any of the specifics of the information on the Application. In addition, NHRS has investigated the access logs for the My Account portal for the relevant period of time. Based on that investigation, we do not have any reason to believe that any other individuals viewed your Application.

While NHRS does not feel that Mr. S [REDACTED] needs to take any particular action to protect himself in light of the limited scope of this incident, we do want to offer him the opportunity to have NHRS pay for two years of identity/credit protection. If either of you have any further questions or concerns, please call me directly at (603) 410-3552.

NHRS takes the privacy and security of our retirees' information extremely seriously. As a result, we regret that an obscure technological issue caused your Application to be seen by others. I apologize for any concern this may cause you, and thank you for your continued trust in NHRS to administer your retirement benefits.

Sincerely,

Nancy J Miller

Nancy J, Miller
Director of Member Services

Enclosure