

Morgan Lewis

STATE OF NH
DEPT OF JUSTICE
2016 MAY -5 AM 11:29

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VIA FIRST CLASS MAIL

May 2, 2016

State of New Hampshire
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notification of Potential Security Breach

Dear Office of the Attorney General:

This Firm represents Nordic Consulting Partners, Inc. ("Nordic") in connection with a situation where Nordic's vendor mailed a tax form to certain current and former Nordic employees in an envelope in which the employee's personal information may have been visible.

Nordic partnered with a vendor, NavigateHCR, to print and mail Form 1095-C (Employer-Provided Health Insurance Offer and Coverage) to our employees and former employees. NavigateHCR's mailing partner determined that if the envelope holding the 1095-C form was shaken just right, the employee's social security number might have been visible. Following that discovery, without prior notice to Nordic, NavigateHCR took action to remedy this by placing a large black circle sticker on the envelope. This is not to Nordic's standards and we would have insisted on the use of a different envelope had NavigateHCR or the mailing partner consulted with us before sending the envelopes. Instead, they only alerted Nordic to this after the fact. On April 21, 2016, NavigateHCR confirmed to Nordic that some of Nordic's employees might have been sent a 1095-C tax form with a Social Security number visible through a window in the envelope.

At this time, we have not received any reports of improper use of the affected employees' personal information. Nonetheless, Nordic sent notification letters out to all individuals who were sent 1095-C Forms from NavigateHCR.

Further information about what Nordic has done and what we are recommending to the employees in question can be found in the enclosed notification letter sent to six New Hampshire residents.

If you have any questions, please feel free to contact me.

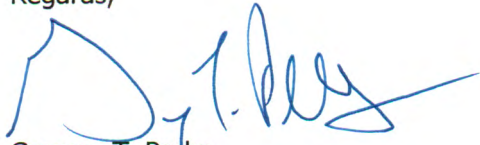
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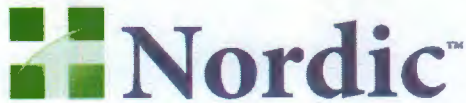
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Regards,

A handwritten signature in blue ink, appearing to read "G. T. Parks", with a long horizontal flourish extending to the right.

Gregory T. Parks

Enclosures



RE: Follow up on the potential data breach with Form 1095-C

Dear current and former Nordic team members,

This message is a follow-up to the one sent out by Nordic on Friday April 22, 2016, informing you that certain of your personal information may have been subject to a compromise. While we have no reason to believe that your information has been or will be used inappropriately, we are writing to update you on what happened, what information was involved, what we have done to address the situation, and to remind you of what you can do to protect your continued privacy and financial security.

What Happened

As explained in our April 22, 2016 e-mail, you have recently received a Form 1095-C (Employer-Provided Health Insurance Offer and Coverage). Nordic partnered with a vendor, NavigateHCR, to print and mail Form 1095-C to our employees and former employees. NavigateHCR's mailing partner determined that if the envelope holding the 1095-C form was shaken just right, the employee's social security number might have been visible. Following that discovery, without prior notice to Nordic, NavigateHCR took action to remedy this by placing a large black circle sticker on the envelope. This is not to Nordic's standards and we would have insisted on the use of a different envelope had NavigateHCR or the mailing partner consulted with us before sending the envelopes. Instead, they only alerted Nordic to this after the fact. On April 21, 2016, NavigateHCR confirmed to Nordic that some of Nordic's employees might have been sent a 1095-C tax form with a Social Security number visible through a window in the envelope. We are writing to you because the envelope containing your Form 1095-C may have contained a black sticker.

While we are not aware of anyone actually stealing your social security number or using it in any way, Nordic is not willing to take any chances on this issue.

What Information Was Involved

As you may know, your 1095-C form includes your name, address, and social security number, as well as the names, dates of birth and social security numbers for any covered individuals, if applicable. To date, we have not received any reports of the improper use of any of this information.

What We Are Doing to Help Safeguard You

Since we learned this information, we have been in touch with Navigate HCR to determine what happened and how we can prevent this situation from happening again. We are also taking steps to try to ensure that future mailings of this sort occur only in envelopes that are completely secure.

In addition, Nordic is working with NavigateHCR to provide you with a 36-month identity theft protection service subscription. Over the next week or so, you can expect to receive a letter in the mail from Experian (a reputable credit bureau) which will contain information about the identity protection service being offered to you. As a safeguarding measure, I encourage you to sign-up and utilize this service at no cost to you.

What You Can Do To Protect Yourself

o: 608.268.6900 | www.nordicwi.com



There are several steps you can take to protect your continued privacy and be sure that the information is not used improperly, many of which are good practices in any event.

First, sign up for the free 36 month Identify Theft protection being offered free of charge through you through Experian. Please watch for this free service offer in the mail.

Second, contact any financial institutions that you bank with and advise them of this situation, particularly if any of them use your social security number to identify or verify you. Check your accounts online or via telephone for any potential fraudulent activity. You should check your periodic statements from each such financial institution or credit card company promptly upon receiving them to be sure that no unauthorized transactions have occurred. If you find any, contact the financial institution promptly by telephone and follow up with a written notification.

Third, place a fraud alert or freeze on your credit file with the three major credit reporting agencies by contacting any one of them at:

Experian	Equifax	TransUnion
888-397-3742	800-525-6285	800-680-7289

A fraud alert is a consumer statement added to your credit report. This statement alerts creditors of possible fraudulent activity within your report as well as requests that they contact you prior to establishing any accounts in your name. Once the fraud alert is added to your credit report, all creditors should contact you prior to establishing any account in your name. A credit freeze prevents any new credit from being established with your social security number – even if you are the one attempting to establish the credit – until you lift the freeze.

For More Information

For general information on protecting your privacy and preventing unauthorized use of your personal information, you may visit the U.S. Federal Trade Commission's Web site, <http://ftc.gov> or contact your state office of consumer affairs or attorney general. You can also see the attached "Reference Guide" for more information relevant to your state.

* * *

We are committed to maintaining the security and privacy of the personal information you entrusted to us. We apologize for any inconvenience or concern this incident may cause. If we can be of any further assistance or answer any questions, or you encounter any problems that you believe to be related to this incident please contact Human Resources at hr@nordicwi.com, or call Nordic's Home Office at [\(608\) 268-6900](tel:6082686900) and ask to be connected to HR.

Sincerely,

Pam Stampen
VP, Human Resources

o: 608.268.6900 | www.nordicwi.com

Reference Guide

In the event that you ever suspect that you are a victim of identity theft, we encourage you to consider taking the following steps:

Contact the Federal Trade Commission. You can contact the Federal Trade Commission's Consumer Response Center at 600 Pennsylvania Avenue, NW, Washington, DC, 20580 or at <http://www.ftc.gov/bcp/menus/business/data.shtml>, to obtain more information about steps you can take to avoid identity theft.

Order Your Free Credit Report. To order your free credit report, visit www.annualcreditreport.com, call toll-free at 877-322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's website at www.ftc.gov and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. Do not contact the three credit bureaus individually; they provide your free report only through the website or toll-free number.

When you receive your credit report, review the entire report carefully. Look for any inaccuracies and/or accounts you don't recognize, and notify the credit bureaus as soon as possible in the event there are any.

Place a Fraud Alert on Your Credit File: To protect yourself from possible identity theft, consider placing a fraud alert on your credit file. A fraud alert helps protect you against the possibility of an identity thief opening new credit accounts in your name. When a merchant checks the credit history of someone applying for credit, the merchant gets a notice that the applicant may be a victim of identity theft. The alert notifies the merchant to take steps to verify the identity of the applicant. You can report potential identity theft to all three of the major credit bureaus by calling any one of the toll-free fraud numbers below. You will reach an automated telephone system that allows you to flag your file with a fraud alert at all three bureaus.

Equifax	P.O. Box 740241 Atlanta, Georgia 30374-0241	877-478-7625	www.equifax.com
Experian	P.O. Box 9532 Allen, Texas 75013	888-397-3742	www.experian.com
TransUnion	Fraud Victim Assistance Division P.O. Box 6790 Fullerton, California 92834-6790	800-680-7289	www.transunion.com

Place a Security Freeze on Your Credit File. You may wish to place a "security freeze" on your credit file. A security freeze generally will prevent creditors from accessing your credit file at the three nationwide credit bureaus without your consent. You can request a security freeze by contacting the credit bureaus at:

Equifax	P.O. Box 105788 Atlanta, Georgia 30348	www.equifax.com
Experian	P.O. Box 9554 Allen, Texas 75013	www.experian.com
TransUnion	Fraud Victim Assistance Division P.O. Box 6790 Fullerton, California 92834-6790	www.transunion.com

The credit bureaus may charge a reasonable fee to place a freeze on your account, and may require that you provide proper identification prior to honoring your request. In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.)

2. Social Security number
3. Date of birth
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years.
5. Proof of current address, such as a current utility bill or telephone bill
6. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.)
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to law enforcement agency concerning identity theft
8. If you are not a victim of identity theft, include payment by check, money order, or credit card (Visa, MasterCard, American Express or Discover only). Do not send cash through the mail.

Placing a security freeze on your credit file may delay, interfere with, or prevent timely approval of any requests you make for credit, loans, employment, housing or other services. For more information regarding credit freezes, please contact the credit reporting agencies directly.

Contact the U.S. Federal Trade Commission. If you detect any incident of identity theft or fraud, promptly report the incident to your local law enforcement authorities, your state Attorney General and the Federal Trade Commission ("FTC"). If you believe your identity has been stole, the FTC recommends that you take these additional steps.

- Close the accounts that you have confirmed or believe have been tampered with or opened fraudulently. Use the FTC's ID Theft Affidavit (available at www.ftc.gov/idtheft) when you dispute new unauthorized accounts.
- File a local police report. Obtain a copy of the police report and submit it to your creditors and any others that may require proof of the identity theft crime.

You can learn more about how to protect yourself from becoming an identity theft victim of by contacting the FTC:

Federal Trade Commission
Consumer Response Center
600 Pennsylvania Avenue, NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)

For Maryland Residents: You can obtain information from the Maryland Office of the Attorney General about steps you can take to help prevent identity theft. You can contact the Maryland Attorney General at:

Maryland Office of the Attorney General
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
888-743-0023, www.oag.state.md.us

For Massachusetts Residents: You have a right to request from us a copy of any police report filed in connection with this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it. If you have been a victim of identity theft, and you provide the credit reporting agency with a valid police report, it cannot charge you to place, lift, or remove a security freeze. In all other cases, a credit reporting agency may charge you up to \$5 each to place, temporarily lift, or permanently remove a security freeze.

For North Carolina Residents: You can obtain information from the North Carolina Office of the Attorney General about steps you can take to help prevent identity theft. You can contact Attorney General Roy Cooper's Consumer Hotline toll-free within North Carolina at 1-877-5-NO-SCAM or (919) 716-6000.