

KING & SPALDING

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September 22, 2016



By First-Class Mail

Consumer Protection Bureau
Attn: Investigations
Department of Justice
33 Capitol Street
Concord, NH 03301

Re: Data Incident

Dear Investigators:

I write on behalf of Novation to inform you of a data incident involving 21 individuals who are New Hampshire residents. Novation is providing notice because it takes the protection and proper use of personal information very seriously.

In late August, Novation learned that some of its confidential information may be in the possession of an unidentified third-party. Novation promptly initiated a fact-gathering process and, subsequently, on September 8, 2016, determined that an unidentified third-party was likely in possession of a set of Novation files including applications and contracts. Novation reviewed copies of those files and some of them contained documents with information including name, date of birth, address, telephone number, Social Security Number and in some cases financial account number. Novation has no evidence that any of the information has been misused.

Novation continuously assess its practices, and will implement any additional security controls that are needed, review and update privacy and security policies as appropriate, and ensure that its personnel are properly trained in information privacy and security practices. Novation is confident that this was an isolated event.

On September 23, 2016, Novation will mail notification to the affected individuals regarding this incident and explain steps that they may take to protect against the potential misuse of their information. An unaddressed copy of this notification is enclosed with this letter. To further alleviate any concerns, Novation secured the services of Kroll to provide identity

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monitoring at no cost for one year for affected individuals. The services are described in the brochure enclosed with the attached letter.

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

Sincerely,

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke at the end, characteristic of a cursive signature.

Steven T. Snyder
Partner

STS:jas