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STATE OF NH
DEPT OF JUSTICE
2016 MAY -2 PM 12:06

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April 26, 2016

VIA U.S. MAIL

Attorney General Joseph Foster
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 Foster:

We represent O.C. Tanner, 1930 South State Street, Salt Lake City, Utah 84115, and are writing to notify your office of an incident that affects the security of personal information relating to two (2) New Hampshire residents. By providing this notice, O.C. Tanner does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Nature of Data Event

On Thursday, April 14, 2016, O.C. Tanner was the targeted victim of an e-mail phishing attack. Through this attack, a request was made for employee 2015 Tax Form W-2 information. The 2015 Tax Form W-2 information was sent in response to the fraudulent email and included the following categories of information: (1) name; (2) address; (3) Social Security number; and (4) wage information, if any wages were earned from O.C. Tanner in 2015. Within hours of the information being provided, O.C. Tanner discovered that the request was made from a fraudulent account, by an individual purporting to be another O.C. Tanner employee. O.C. Tanner immediately began an investigation to determine the nature and scope of this incident.

Notice to New Hampshire Residents

On Friday, April 15, 2016, O.C. Tanner began notifying individuals whose information may have been compromised by this incident via email, and provided details of the incident, information on steps individuals can take to protect against identity theft and fraud, access to one (1) year of free

credit monitoring, and contact information individuals may use should they have questions or concerns. A copy of that email notice is attached hereto as *Exhibit A*. In addition to the email notice, on April 27, 2016, O.C. Tanner will begin mailing notice letters to potentially affected individuals, which includes two (2) New Hampshire residents. The notice letter will be provided in substantially the same form as the letter attached here as *Exhibit B*.

Other Steps Taken and To Be Taken

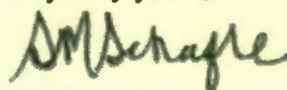
Upon discovering this incident, O.C. Tanner moved quickly to identify those that may be affected, to put in place resources to assist them, and to provide them with notice of this incident. As noted above, O.C. Tanner is providing potentially affected individuals access to one (1) free year of credit and identity monitoring services, including identity restoration services, through Experian. Additionally, O.C. Tanner is providing potentially affected individuals with information 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, information on protecting against tax fraud, the contact details for the national consumer reporting agencies and the Internal Revenue Service ("IRS"), and encouragement to contact the Federal Trade Commission, State Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

O.C. Tanner notified the Federal Bureau of Investigation, IRS, and other state regulators of this incident. O.C. Tanner is also reviewing its policies and procedures relating to data privacy and has provided further education to its staff on data privacy related issues, including email phishing and spoofing attacks.

Contact Information

Should you have any questions regarding this notification of other aspects of this event, please contact us at 215-977-4067.

Very truly yours,



Sian M. Schafle of
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure

EXHIBIT A

We are writing to let you know of an event affecting your personal information. We are notifying you so you can take action along with our efforts to minimize or mitigate any potential financial harm. We strongly recommend you take the preventative measures listed below to better protect against misuse of your personal information.

What Happened: On April 14, 2016, an O.C. Tanner employee was the targeted victim of an e-mail spoofing attack. Through this email, a request was made for employee Tax Form W-2 information. Unfortunately, this information was provided before it was discovered that the request was made from a fraudulent account by an individual purporting to be another employee. We discovered the fraudulent nature of this request almost immediately and have been working tirelessly to investigate.

What Information is Involved? Data from O.C. Tanner employees' 2015 IRS W-2 Tax Forms and data from some former employees, which includes the following categories of information: (1) your name; (2) address; (3) Social Security number; and (4) wage information.

What We Are Doing. We take this incident, and the security of your personal information, very seriously. We have stringent security measures in place to protect the security of information in our possession, and, as a result of this incident, we are working to implement additional safeguards and provide additional training to our employees on safeguarding the privacy and security of information.

In addition to notifying individuals potentially impacted by this incident, we are notifying the IRS Identity Theft Specialized Unit and have spoken to the local FBI cyber crimes unit.

Sign-up For ProtectMyID Elite. To help detect the possible misuse of your information and assist you if such misuse does occur, we are providing you complimentary access to one year of credit monitoring and identity restoration services with Experian's ProtectMyID Elite product.

To enroll and start monitoring your personal information, please follow the steps below:

1. ENSURE That You Enroll By: July 31, 2016 (Your code will not work after this date.)
2. VISIT the ProtectMyID Web Site to enroll: www.protectmyid.com/enroll
3. PROVIDE Your personally assigned Activation Code: [code]

If you have any questions or need an alternative to enrolling online, please call 877-441-6943 and provide engagement #: PC100910

Once your enrollment in ProtectMyID Elite is complete, you should carefully review your credit report for inaccurate or suspicious items.

Discussing Externally. Please don't share this news outside of O.C. Tanner, as we are trying to minimize the impact on O.C. Tanner's employees.

If you happen to be approached by a reporter requesting information, please offer no comment and contact Dan Martinez (801-502-6092, dan.martinez@octanner.com) and Brad Plothow at Method

Communications immediately (801-669-3134, brad@methodcommunications.com). Again, in order to best control the situation and protect employees, please give no comment.

What Else You Can Do. Other preventative measures you may consider taking are as follows:

- **Monitor your financial accounts carefully**, and if you see any unauthorized activity, promptly contact your bank, credit union, or credit card company. Look for inquiries from companies you haven't contacted, accounts you didn't open, and debts on your accounts that you can't explain.
- **File your taxes as soon as possible**, if you have not already. You may also file an IRS Identify Theft Affidavit ([IRS Form 14039](#)).

We will also send you a letter in the mail, re-iterating steps you can take to protect yourself. **If you have any additional questions** please call our main number at (801) 486-2430 and ask for someone in People & Great Work.

We are very sorry for any inconvenience or concern this incident causes you and thank you, in advance, for your cooperation. The security of your information is a priority to us, and we are taking steps to reduce the likelihood of an incident like this from happening again.

Aimee Wilson
Sr. VP, People & Great Work

Subject: Identity Protection Follow-up

As a follow-up to the email you should have received this past Friday, we wanted to encourage you to sign-up for the complimentary credit monitoring service that O.C. Tanner is providing to all employees who were impacted. Also, below you will find some additional answers to frequently asked questions.

Sign-up For ProtectMyID Elite

To help detect the possible misuse of your personal information and assist you if such misuse does occur, O.C. Tanner is providing you complimentary access to one year of credit monitoring and identity restoration services with Experian's ProtectMyID Elite product.

If you haven't already enrolled, please follow the steps below:

- 1 ENSURE That You Enroll by: July 31, 2016 (Your code will not work after this date)
- 2 VISIT the ProtectMyID Web Site to enroll: www.protectmyid.com/enroll
- 3 PROVIDE The personally assigned Activation Code you should have received in the email sent on Friday April 15, 2016

If you have any questions or need an alternative to enrolling online, please call **877-441-6943** and provide engagement #: PC100910

Once your enrollment in ProtectMyID Elite is complete, you should carefully review your credit report for inaccurate or suspicious items.

Frequently Asked Questions

Since personal addresses were part of the information sent out, could my mail be affected?

It is recommended that you monitor your U.S. Mail. If you receive an unexpected change of address notice or if you stop receiving mail, contact the U.S. Postal Service to determine whether an unauthorized change of address form has been filed.

Should I change any of my settings on social media?

We suggest you look at the information on your various social media accounts and privatize any personal information, including birthdays, addresses and phone numbers.

Should I put in place a "security freeze"?

Because placing a security freeze on your credit report tells creditors to follow certain procedures to protect you, doing so may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. Please consider carefully whether or not this action is right for you as it would be in addition to the credit monitoring and identity restoration services from Experian that O.C. Tanner is already providing for free.

A security freeze can be placed on a person's credit reports to prohibit a credit bureau from releasing any information from your credit report without your written authorization. *If you have been a victim of identity theft*, and you provide the credit bureau with a valid police report, it cannot charge you to place, list or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze

separately with each of the three major credit bureaus if you wish to place a freeze on all of your credit files.

Should this matter be discussed externally?

Please don't share this news outside of O.C. Tanner, as we are trying to minimize the impact on O.C. Tanner's employees.

If you happen to be approached by a reporter requesting information, please offer no comment and contact Dan Martinez (801-502-6092, dan.martinez@octanner.com) or Brad Plothow at Method Communications immediately (801-669-3134, brad@methodcommunications.com).

Is my financial information at risk?

Other than the W-2 information, no financial information was sent. *There was no credit card or banking account information included.* However, we encourage you to remain vigilant in monitoring your bank and credit accounts for suspicious activity

Am I going to receive a letter about this incident?

In addition to the email already sent, we will also send a letter in the mail, re-iterating steps you can take to protect yourself.

If you have any additional questions, please call our main number at (801) 486-2430 and ask for someone in People & Great Work. We are here to help. It's up to your own discretion, but should you experience any credit or identity theft issues, we would appreciate you letting us know.

Aimee Wilson
Sr. VP, People & Great Work

EXHIBIT B

[Employee Name]
[Street Address]
[City, State Zip Code]

RE: [Merge field 1]

[Employee Name]:

I am writing to inform you that O.C. Tanner has been the targeted victim of an email phishing attack, and that the security of your personal information, contained on an Internal Revenue Service (IRS) Tax Form W-2, may be at risk as a result of this incident. We take this incident very seriously and are providing this notice to ensure that you are aware of the incident, so that you may take steps to protect your personal information should you feel it is appropriate to do so.

What Happened? On April 14, 2016, O.C. Tanner was the targeted victim of an e-mail phishing attack. Through this attack, a request was made for employee Tax Form W-2 information. Unfortunately, this information was provided before it was discovered that the request was made from a fraudulent account by an individual purporting to be another employee. We discovered the fraudulent nature of this request on April 14, 2016 and have been working tirelessly to investigate.

What Information Was Involved? Your 2015 IRS Tax Form W-2 was among the forms that were sent in response to the phishing attack. Your 2015 IRS Tax Form W-2 includes the following categories of information: (1) your name; (2) your address; (3) your Social Security number; and (4) your wage information, if any wages were earned from O.C. Tanner in 2015.

What We Are Doing. We take this incident, and the security of your personal information, very seriously. We have stringent security measures in place to protect the security of information in our possession, and, as a result of this incident, we are working to implement additional safeguards and provide additional training to our employees on safeguarding the privacy and security of information.

In addition to notifying individuals potentially impacted by this incident, we have notified the IRS Identity Theft Specialized Unit, certain state regulators, and have spoken to the local FBI cyber crimes unit. Additionally, we are offering all affected employees [merge field 2] months of free credit monitoring and identity restoration services with Experian's® ProtectMyID Elite product. The enclosed Other Important Information contains instructions on how to enroll and receive these free services, as well as more information on how to better protect against identity theft and fraud.

What You Can Do. We encourage you to enroll to receive the [merge field 2] months of free credit monitoring and identity restoration services. You can also review the enclosed Other Important Information.

For More Information. If you have questions or concerns that are not addressed in this notice letter, you may call the dedicated call center we've established regarding this incident. The call center is staffed with professionals who can answer questions about this incident and give you information on how to protect against misuse of your information. The call center is available Monday - Friday, 9:00 am -9:00pm EST and Saturday – Sunday, 11:00am – 8:00pm EST, at 877-288-8056.

We take the privacy of employees' personal information seriously. We sincerely regret any inconvenience or concern this incident has caused you. The security of your information is a priority to us, and we are taking steps to reduce the likelihood of an incident like this from happening again.

Sincerely,

Julie W. Bartlett
General Counsel

OTHER IMPORTANT INFORMATION

While we continue to investigate, you may take action directly to further protect against possible identity theft or financial loss.

To help detect the possible misuse of your information, we are providing you with [merge field 2] months of free access to credit monitoring and identity restoration services with Experian's® ProtectMyID Elite product. If you are a victim of fraud, simply call Experian at 877-288-8056 by **July 31, 2016**, and a dedicated Identity Theft Resolution agent will help you restore your identity. Please provide the engagement number in this letter as proof of eligibility.

While Identity Theft Resolution assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through ProtectMyID Elite. This product provides you with superior identity protection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

Activate ProtectMyID Now in Three Easy Steps

1. ENSURE That You Enroll By: July 31, 2016 (Your code will not work after this date.)
2. VISIT the ProtectMyID Web Site to enroll: www.protectmyid.com/enroll
3. PROVIDE Your Activation Code: [code]

If you have questions or need an alternative to enrolling online, please call 877-288-8056 and provide engagement #: XXXXX.

ADDITIONAL DETAILS REGARDING YOUR [merge field 2] MONTH PROTECTMYID MEMBERSHIP:

A credit card is not required for enrollment.

Once your ProtectMyID membership is activated, you will receive the following features:

- **Free copy of your Experian credit report.**
- **Surveillance Alerts for:**
 - Daily 3 Bureau Credit Monitoring: Alerts of key changes & suspicious activity found on your Experian, Equifax®, and TransUnion® credit reports.
- **Internet Scan:** Alerts if your personal information is located on sites where compromised data is found, traded or sold.
- **Change of Address:** Alerts of any changes in your mailing address.
- **Identity Theft Resolution & ProtectMyID ExtendCARE:** Toll-free access to US-based customer care and a dedicated Identity Theft Resolution agent who will walk you through the process of fraud resolution from start to finish for seamless service. They will investigate each incident; help with contacting credit grantors to dispute charges and close accounts including credit, debit and medical insurance cards; assist with freezing credit files; contact government agencies. It is recognized that identity theft can happen months and even years after a data breach. To offer added protection, you will receive ExtendCARE, which provides you with the same high-level of Fraud Resolution support even after your ProtectMyID membership has expired.
- **\$1 Million Identity Theft Insurance¹:** Immediately covers certain costs including lost wages, private investigator fees, and unauthorized electronic fund transfers.
- **Lost Wallet Protection:** If you misplace or have your wallet stolen, an agent will help you cancel your credit, debit, and medical insurance cards.

Once your enrollment in ProtectMyID Elite is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID Elite, need help understanding something on your credit

¹ Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of 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.

report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8056.

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports and explanation of benefits forms 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.

At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax
P.O. Box 105069
Atlanta, GA 30348
800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
800-680-7289
www.transunion.com

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft, and you provide the credit bureau with a valid police report, it cannot charge you to place, list or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
(NY residents please call
1-800-349-9960)
www.equifax.com/help/credit-freeze/en_cp

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion
PO Box 2000
Chester, PA 19022-2000
1-888-909-8872
www.transunion.com/securityfreeze

You can further educate yourself regarding identity theft, fraud alerts, and the steps you can take to protect yourself, by contacting 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. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. **For Maine residents**, the Attorney General can be reached at: 6 State House Station, Augusta, Maine, 04333, (207) 626-8800. **For Iowa residents**: You may contact local law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity theft. You can contact the Iowa Attorney General at: Office of the Attorney General, 1305 E. Walnut Street, Des Moines, IA 50319, (515) 281-5164; and online at <http://www.iowaattorneygeneral.gov/>. **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. Instances of known or suspected identity theft should also be reported to law enforcement. This notice has not been delayed as a result of law enforcement involvement.