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December 13, 2018

Michael J. Waters
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Via Email (ATTORNEYGENERAL@DOJ.NH.GOV) and
Federal Express

Attorney General Gordon J. MacDonald
Office of the Attorney General
Attn: Security Incident Notification
33 Capitol Street
Concord, NH 03301

**Re: Notification of a Computer Security Incident Involving Personal
Information Pursuant to N.H. Rev. Stat. § 359-C:20**

Dear Attorney General MacDonald:

We represent Okabena Company (Okabena) in connection with an incident that involved the personal information of one (1) New Hampshire resident, and provide this notice on behalf of Okabena pursuant to N.H. Rev. Stat. § 359-C:20. This notice will be supplemented, if necessary, with any new significant facts discovered subsequent to its submission. While Okabena is notifying you of this incident, Okabena does not waive any rights or defenses relating to the incident or this notice, or the applicability of New Hampshire law on personal jurisdiction.

NATURE OF THE SECURITY INCIDENT OR UNAUTHORIZED ACCESS

Okabena recently became aware of an employee email account compromise. Upon discovery of the incident, Okabena immediately shut down the affected email boxes. Okabena also hired a leading forensic security firm to investigate and confirm the overall security of its email and computer systems. On November 20, 2018, Okabena learned that some personal information could have been viewed as part of the compromise, including the name, address, driver's license number and Social Security number of a New Hampshire resident.

At this point, Okabena is not aware of any fraud or identity theft to any individual as a result of this incident, and cannot confirm if any personal information was actually obtained by an unauthorized party. Nevertheless, because there was an email account compromise and Okabena cannot isolate exactly what, if any, information may have been obtained, it is notifying all individuals whose personal information could have been accessed.

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NUMBER OF NEW HAMPSHIRE RESIDENTS AFFECTED

It was determined that one New Hampshire resident may have been impacted by this incident. Okabena notified the impacted individual of the situation by letter on October 12, 2018. Enclosed is a copy of the notice that was sent to the impacted individual.

STEPS TAKEN RELATING TO THE INCIDENT

Upon learning of the incident, Okabena promptly terminated the account credentials and retained a leading forensic security firm to investigate and confirm the security of its email and computer systems. Okabena is also providing complimentary identity theft protection services to the impacted individual through Experian.

CONTACT INFORMATION

Please contact me if you have any questions or if I can provide you with any further information concerning this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Waters".

Michael J. Waters

Enclosure



December 12, 2018

<<Name>>

<<Address>>

<<City>>, <<State>> <<Zip>>

NOTICE OF A DATA BREACH

Dear :

We value and respect your privacy, which is why we are writing to advise you about a recent incident that may affect your personal information. Although we have no reason to believe that your personal information has been misused, we are writing to advise you about the steps that we have taken to address the incident and provide you with guidance on what you can do to protect yourself.

What Happened

Earlier this fall, we became aware of an employee email account compromise. Upon discovery of the incident, we immediately shut down the affected email boxes. We also hired a leading forensic security firm to investigate and confirm the overall security of our email and computer systems. On November 20, 2018, we learned that some of your personal information could have been viewed as part of the compromise.

At this point, we are also not aware of any fraud or identity theft to any individual as a result of this incident, and cannot confirm if any personal information was actually obtained by an unauthorized party. Nevertheless, because there was an email account compromise and we cannot isolate exactly what, if any, information may have been obtained, we thoroughly searched each of the impacted email accounts for personal information.

What Information Was Involved

You are receiving this notice because certain of your personal information was in the accounts and could have been accessed, including your name, Social Security number and, for some people, address and/or driver's license number.

What We Are Doing

Although we are not aware of any instances of fraud or identity theft, we are offering a complimentary one-year membership of Experian IdentityWorks Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. **For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.**

What You Can Do

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

For More Information

We value the trust you place in us to protect the privacy and security of your personal information, and we apologize for any inconvenience or concern that this incident might cause you. For further information and assistance, please call (612) 339-7151 between 8:30 a.m. and 5:00 p.m., Central Time, Monday through Friday.

Sincerely,

James H. Field
President, Okabena Company

Douglas A. Neimann
President and Chief Investment Officer, OIS

Activating Your Complimentary Credit Monitoring

To help protect your identity, we are offering a complimentary one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll:
<https://www.experianidworks.com/3bcredit>
3. PROVIDE the **Activation Code**:

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-288-8057. Be prepared to provide engagement number as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian Identity Works, you will have access to the following additional features:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

Activate your membership today at <https://www.experianidworks.com/3bcredit> or call 877-288-8057 to register with the Activation Code listed above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8057.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of AIG. The description herein is a summary and is intended for informational purposes only, and it 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.

Additional Important Information

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft. For more information and to contact the FTC, please visit www.ftc.gov/idtheft or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

Credit Reports: You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print a copy of the request form at www.annualcreditreport.com/cra/requestformfinal.pdf.

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries, including obtaining information about fraud alerts and placing a security freeze on your credit files, is as follows:

Equifax
1-800-349-9960
www.equifax.com
P.O. Box 105788
Atlanta, GA 30348

Experian
1-888-397-3742
www.experian.com
P.O. Box 9554
Allen, TX 75013

TransUnion
1-888-909-8872
www.transunion.com
P.O. Box 2000
Chester, PA 19022

Fraud Alerts: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least ninety (90) days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at www.annualcreditreport.com.

Credit and Security Freezes: You may have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies using the contact information above.

In order to request a security freeze, you may 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 a law enforcement agency concerning identity theft;

The credit reporting agencies have three (3) business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with a unique personal identification number (PIN) or password, or both that can be used by you to authorize the removal or lifting of the security freeze.

To remove the security freeze or lift the freeze in order to allow a specific entity or individual access to your credit report, you must call or send a written request to the credit reporting agencies by mail and include proper identification (name, address, and social security number) **and** the PIN number or password provided to you when you placed the security freeze as well as the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have three (3) business days after receiving your request to remove or lift the security freeze for those identified entities or for the specified period of time.

If you do not have internet access but would like to learn more about how to place a security freeze on your credit report, contact the Vermont Attorney General's Office at 802-656-3183 (800-649-2424 toll free in Vermont only).

Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by requesting information in writing from the Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. NW, Washington, DC 20580.

Massachusetts Residents: Under Massachusetts law, you have the right to obtain any police report filed in regard to 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.