MAYNARD
COOPER GALE

March 30, 2023

RECEIVED

APR 05 2023

CONSUMER PROTECTION

Consumer Protection Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notice of a Security Incident

Dear Attorney General Formella,

Pursuant to N.H. Rev. Stat. Ann. § 359-C:20, I am writing to let you know that our client, O'Neal Industries, Inc. ("ONI" or "Company"), experienced a security incident that involved files containing the personally identifiable information ("PII") of three (3) New Hampshire residents.

In December of 2022, law enforcement informed ONI that it had uncovered a data file relating to the Company. ONI immediately launched an investigation with the help of external cybersecurity experts. In due course, ONI came to learn that an unknown actor had gained unauthorized access to portions of its computer network in November of 2022 using a highly sophisticated type of malware that evaded the detection of the Company's security tools. Some of these systems contained personnel information relating to the Company's workforce, including

ONI performed a review of files impacted by this incident for personal information. Notice was supplied to individuals as they were identified in the data set. To date, ONI has supplied written notice to three (3) New Hampshire residents. A representative example of the notice being furnished to affected individuals is attached as **Exhibit A**, which includes a complimentary enrollment in credit monitoring and identity theft protection services.

ONI has been working with external cybersecurity experts to implement additional safeguards to strengthen its computer network, including the use of additional authentication requirements, detection software, and monitoring tools. Other remediation measures included password resets (domain, administrator and user), password rotations, server hardening, and security configuration updates.

Please do not hesitate to let me know if you have any questions regarding this notice.

Very truly yours,

J.T. Malatesta

EXHIBIT A

Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

March 30, 2023

J2409-L01-0000001 T00001 P001 ********SCH 5-DIGIT 12345
SAMPLE A SAMPLE - L01 FORMER
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789

Re: Notice of Security Incident

Dear Sample A. Sample

I hope this letter finds you well. I am writing to let you know about a security incident that O'Neal Industries has experienced that resulted in unauthorized access to some of our computer systems. Unfortunately, one of those systems contained HR files that store social security numbers and other personal information we maintain on file for our former employees and, in some cases, their beneficiaries or dependents.

To our knowledge, we are not aware of any actual or attempted misuse of personal information as a result of this incident. However, as a precautionary measure, you have the opportunity to enroll in an identity protection solution through Experian at no cost to you. This service will provide [Extra2] of credit and identity protection services.

Additional information about the incident, our ongoing response, and the resources that are available to help protect your information can be found below.

What Happened? Through our investigation, we have learned that computer systems within our network were accessed in November 2022 using a highly sophisticated type of malware that evaded virus detection by our security tools. Fortunately, none of the platforms or companies that administer our employee benefits were impacted.

What Are We Doing? We have hired external cybersecurity experts to investigate what happened, to strengthen our computer network, and to monitor the "dark web" for any references to information involved in this incident. These efforts are all ongoing.

What Information Was Involved? The personal information provided to Human Resources to enroll in employee benefits, including your [Extra1].

What You Can Do? We are providing an Identity Protection Reference Guide that includes information on general steps you can take to monitor and protect your personal information. You will also find information enclosed on how to enroll in the credit and identity protection services we are offering you, free of charge, if you are interested in these services.

For More Information. If you have any questions or concerns, please reach out to our dedicated support team at (Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays).

Sincerely,

Ruffner Page
President & Chief Operating Officer
O'Neal Industries

IDENTITY PROTECTION REFERENCE GUIDE

1. Review your Credit Reports. We recommend that you monitor your credit reports for any activity you do not recognize. Under federal law, you are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To order your free annual credit report, visit www.annualcreditreport.com, call toll-free (877) 322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's ("FTC") website at www.ftc.gov and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. The three credit bureaus provide free annual credit reports only through the website, toll-free number or request form.

If you see anything in your credit report that you do not understand, call the credit bureau at the telephone number on the report. You should notify the credit bureaus of any inaccuracies in your report, whether due to error or fraud, as soon as possible so the information can be investigated and, if found to be in error, corrected. If there are accounts or charges you did not authorize, immediately notify the appropriate credit bureau by telephone and in writing.

2. Place Fraud Alerts. You can place a fraud alert at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. Please note that placing a fraud alert may delay you when seeking to obtain credit. You can learn more about fraud alerts by contacting the credit bureaus or by visiting their websites:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-833-806-1627
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

It is only necessary to contact <u>one</u> of these bureaus and use only <u>one</u> of these methods. As soon as one of the three bureaus confirms your fraud alert, the others are notified to place alerts on their records as well. You should receive confirmation letters in the mail and will then be able to order all three credit reports, free of charge, for your review.

3. Place Security Freezes. By placing a security freeze, someone who fraudulently acquires your personally identifying information will not be able to use that information to open new accounts or borrow money in your name. Federal and state laws prohibit charges for placing, temporarily lifting, or removing a security freeze. Keep in mind that when you place the freeze, you will not be able to borrow money, obtain instant credit, or get a new credit card until you temporarily lift or permanently remove the freeze.

To place a security freeze, you must contact <u>each</u> of the three national credit reporting bureaus listed above and provide the following information: (1) your full name; (2) your social security number; (3) date of birth; (4) the addresses where you have lived over the past two years; (5) proof of current address, such as a utility bill or telephone bill; (6) a copy of a government issued identification card; and (7) if you are the victim of identity theft, include the police report, investigative report, or complaint to a law enforcement agency. If the request to place a security freeze is made by toll-free telephone or secure electronic means, the credit bureaus have one business day after receiving your request to place the security freeze on your credit report. If the request is made by mail, the credit bureaus have three business days to place the security freeze on your credit report after receiving your request. The credit bureaus must send confirmation to you within five business days and provide you with information concerning the process by which you may remove or lift the security freeze.

4. Monitor Your Account Statements. We encourage you to carefully monitor your financial account statements for fraudulent activity and report anything suspicious to the respective institution or provider.

5. You can also further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, your state Attorney General, or the Federal Trade Commission (FTC). The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (877-438- 4338); and TTY: 866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them.

District of Columbia Residents: You can obtain additional information about identity theft prevention and protection from the Attorney General for the District of Columbia, 400 6th Street NW, Washington, D.C. 20001, (202) 727-3400, https://oag.dc.gov/.

Iowa Residents: You can report suspected identity theft to law enforcement, the FTC, or to the Office of the Attorney General of Iowa, Consumer Protection Division, Hoover State Office Building, 1305 E. Walnut Street, Des Moines, Iowa 50319-0106, 1-888-777-4590, https://www.iowaattorneygeneral.gov/.

Maryland Residents: You can obtain additional information about identity theft prevention and protection from the Maryland Attorney General, Identity Theft Unit at: 200 St. Paul Place, 25th Floor, Baltimore, MD 21202, 1-866-366-8343 or (410) 576-6491, https://www.marylandattorneygeneral.gov.

Massachusetts Residents: You have a right to file a police report and obtain a copy of your records. You can obtain additional information about identity theft prevention and protection from the Office of Consumer Affairs and Business Regulation, 501 Boylston Street, Suite 5100, Boston, MA 02116, (617) 973-8787, https://www.mass.gov/service-details/identity-theft.

New York Residents: You can obtain additional information about identity theft prevention and protection from the New York State Attorney General, The Capitol, State Street and Washington Avenue, Albany, NY 12224-0341, 1-800-771-7755, https://ag.ny.gov/.

North Carolina Residents: You can obtain additional information about preventing identity theft from the North Carolina Office of the Attorney General, Consumer Protection Division at: 9001 Mail Service Center, Raleigh, NC 27699-9001, (877) 566-7226 (toll-free within North Carolina) or (919) 716-6000, https://ncdoj.gov/.

Oregon Residents: You can report suspected identity theft to law enforcement, the FTC, or the Oregon Office of the Attorney General at: Oregon Department of Justice, 1162 Court St NE, Salem, OR 97301, 1-800-850-0228, https://www.doj.state.or.us/.

Rhode Island Residents: You can obtain additional information about identity theft prevention and protection from the Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, (401) 274-4400, https://riag.ri.gov/.

DETAILS REGARDING YOUR EXPERIAN IDENTITYWORKS MEMBERSHIP

We are offering you a [Extra3]-year, complimentary membership for IdentityWorks℠, a product offered by Experian®, to help with detection and resolution of identity theft. To activate your membership and start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by: June 30, 2023** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: https://www.experianidworks.com/plus
- Provide your **activation code**: **ABCDEFGHI**

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 at **(833) 704-9386** by **June 30, 2023**. The call center is open Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays). Be prepared to provide engagement number ENGAGE# as proof of eligibility for the identity restoration services by Experian.

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

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **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 file for indicators of fraud.
- **Internet Surveillance:** Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™**: You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to $1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (833) 704-9386. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for [Extra3] year from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

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

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.