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CONSUMER PROTECTION

April 3, 2020

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

RE: Notice of Data Breach Under N.H. Rev. Stat. §§ 359-C:19, 359-C:20, 359-C:21

Office of the Attorney General:

On or around January 9, 2020, OneDigital experienced a security incident involving the theft of an employee's unencrypted, password-protected, company-issued electronic device. In its investigation of the incident completed on or around February 14, 2020, OneDigital has found no unauthorized access to any individual's personal data.

However, an unauthorized individual(s) may still be able to obtain from the stolen device the personal data of approximately 2 residents of the State, such as name, address/zip code, phone number, email address, partial or full social security number, gender, date of birth/age, member or employee ID, benefits enrollment information, and compensation. OneDigital provided notification to the impacted individuals on or before March 27, 2020. OneDigital also provided affected individuals with one year of identity theft protection services from LifeLock.

OneDigital offers employers a sophisticated combination of strategic benefit advisory services, analytics, compliance support, human resources management tools and comprehensive insurance offerings. The company remains committed to the security and protection of personal data. OneDigital maintains written privacy and security policies and procedures with respect to Protected Health Information (PHI) that comply with the standards and implementation specifications under 45 CFR §164.530(i)(1).

Enclosed please find a template individual notification of, and additional information about, the suspected data breach. If you have additional questions, please feel free to contact me.

Sincerely,

*Erica Cordova Zinkie*

**ERICA CORDOVA ZINKIE, JD**

**VP, Legal and Compliance**

OneDigital | Health and Benefits

office: 770.250.2923

mobile: 678.404.0510

fax: 888.737.8065

[ezinkie@onedigital.com](mailto:ezinkie@onedigital.com)

[Date]

**RE: Notice of Data Breach**

Plan Participant and Enrolled Dependent(s):

We are writing to inform you of a recent security incident at OneDigital (a business associate of your current or former employer), the steps we are taking to protect you following the incident, and the steps you can take to protect yourself.

**What Happened**

On or around January 9, 2020, OneDigital discovered the theft of an employee's unencrypted, password-protected OneDigital electronic device. Upon discovery of the theft, the employee immediately notified local law enforcement authorities. According to our analysis, it does not appear that any of your personal data has been accessed or otherwise affected by the theft of the personal electronic device. However, we are continuing our investigation and will notify you if we discover any suspicious activity.

**What Information Was Involved**

Based on our investigation, while we do not have any evidence that your information has been accessed, we believe that an unauthorized individual(s) may still be able to obtain personal data about you and your enrolled dependent(s), such as:

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> Name                 | <input type="checkbox"/> Mailing Address/Zip Code | <input type="checkbox"/> Phone Number       |
| <input type="checkbox"/> Email Address        | <input type="checkbox"/> Social Security Number   | <input type="checkbox"/> Gender             |
| <input type="checkbox"/> Date of Birth or Age | <input type="checkbox"/> Member or Employee ID    | <input type="checkbox"/> Benefit Enrollment |
| <input type="checkbox"/> Health Factors       | <input type="checkbox"/> Compensation             | <input type="checkbox"/>                    |

**What We Are Doing**

In response to this incident, OneDigital has set the stolen device to permanently remove all data when an online connection is established. Further, OneDigital has installed encryption software on all employee devices. Additionally, to assist you in monitoring your accounts, you may request free identity theft protection services for the next 12 months<sup>8</sup> by contacting LifeLock at 1-800-899-0180 or visiting [www.lifelock.com](http://www.lifelock.com) and clicking "Get Protected or Start Membership."

- Promo/Partner Code: XXXXXXX
- Membership Code: First Name, Last Name, and Zip Code (Example: JOHNNORTON12345)

Impacted individuals must request ID theft protection by May 31, 2020.

Once you have completed the LifeLock enrollment process, the service will be in effect. Your LifeLock Defender™ Choice membership includes:

- ✓ Primary Identity Alert System

<sup>8</sup> 24 months in certain states as required by law.

- ✓ Live Member Support 24/7
- ✓ Stolen Funds Reimbursement up to \$25,000
- ✓ Personal Expense Compensation up to \$25,000
- ✓ Service Guarantee for Lawyers and Experts up to \$1 million
- ✓ Identity Restoration Support
- ✓ One-Bureau Credit Monitoring<sup>1</sup>
- ✓ Annual One-Bureau Credit Report & Credit Score

The credit score provided is a VantageScore 3.0 credit score based on Equifax data. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your creditworthiness.

### **What You Can Do**

As always, we recommend you be on the alert for suspicious activity related to your financial accounts and credit reports. We encourage you to regularly monitor your statements and records to ensure there are no transactions or other activities that you did not initiate or authorize. You may file a police report regarding this incident. Additionally, you should immediately report any suspicious activity to your financial advisor or OneDigital at 770-250-2923. For more information on how to protect against identity theft, we suggest that you contact the Federal Trade Commission and your state consumer protection agency.

### **For More Information**

Please be assured that we are committed to helping you protect your protected health information and identity and ensuring that your information is safe and secure. We regret this incident and apologize for any concern it may have caused you.

If you have further questions regarding this matter, please do not hesitate to contact your financial advisor or us. You may call us at 770-250-2923 or the toll-free number shown below.

Sincerely,

OneDigital Corporate Privacy Officer

To obtain information about fraud alerts, no charge security freezes, and preventing identity theft you may contact the Federal Trade Commission, credit reporting agencies, or your state consumer protection agency. Federal law allows you to get a free copy of your credit report every 12 months from each credit reporting company via [www.annualcreditreport.com](http://www.annualcreditreport.com).

Credit Reporting Bureaus		Contact Information
<b>Equifax</b>	P.O. Box 740241, Atlanta, GA 30374-0241; 866-349-5191; <a href="https://www.equifax.com/">https://www.equifax.com/</a>	
<b>Experian</b>	475 Anton Blvd., Costa Mesa, CA 92626; 714-830-7000; <a href="https://www.experian.com/">https://www.experian.com/</a>	
<b>TransUnion</b>	P.O. Box 2000 Chester, PA 19016-2000; 833-395-6938; <a href="https://www.transunion.com/">https://www.transunion.com/</a>	
Federal Agency		Contact Information
<b>Federal Trade Commission</b>	600 Pennsylvania Avenue, NW, Washington, DC 20580; 202-326-2222; <a href="https://www.consumer.gov/">https://www.consumer.gov/</a>	
State Agencies		Contact Information
<b>Alabama</b>	Alabama Office of the Attorney General; 1-800-392-5658; <a href="http://www.ago.state.al.us/">http://www.ago.state.al.us/</a>	
<b>Alaska</b>	Office of Attorney General; 888-576-2529; <a href="http://www.law.alaska.gov/department/civil/consumer/">http://www.law.alaska.gov/department/civil/consumer/</a>	
<b>Arizona</b>	Arizona Office of the Attorney General-Phoenix; 602-542-5763; <a href="http://www.azag.gov/">http://www.azag.gov/</a>	
<b>Arkansas</b>	Arkansas Office of the Attorney General; 1-800-482-8982; <a href="http://www.arkansasag.gov/">http://www.arkansasag.gov/</a>	
<b>California</b>	California Office of the Attorney General; 1-800-952-5225; <a href="http://www.oag.ca.gov/">http://www.oag.ca.gov/</a>	
<b>Colorado</b>	Colorado Office of the Attorney General; 1-800-222-4444; <a href="http://www.stopfraudcolorado.gov/">http://www.stopfraudcolorado.gov/</a>	
<b>Connecticut</b>	Connecticut Office of the Attorney General; 860-808-5420; <a href="http://www.ct.gov/ag">http://www.ct.gov/ag</a>	
<b>Delaware</b>	Delaware Department of Justice; 1-800-220-5424; <a href="http://www.attorneygeneral.delaware.gov/">http://www.attorneygeneral.delaware.gov/</a>	
<b>Florida</b>	Florida Office of the Attorney General; 1-866-966-7226; <a href="http://myfloridalegal.com/">http://myfloridalegal.com/</a>	
<b>Georgia</b>	Georgia Office of the Attorney General; 1-800-869-1123; <a href="http://consumer.georgia.gov/">http://consumer.georgia.gov/</a>	
<b>Hawaii</b>	Hawaii Office of the Attorney General; 808-586-1500; <a href="http://ag.hawaii.gov/">http://ag.hawaii.gov/</a>	
<b>Idaho</b>	Idaho Office of the Attorney General; 1-800-432-3545; <a href="http://www.ag.idaho.gov/">http://www.ag.idaho.gov/</a>	
<b>Illinois</b>	Illinois Office of the Attorney General; 1-800-386-5438; <a href="http://www.illinoisattorneygeneral.gov/">http://www.illinoisattorneygeneral.gov/</a>	
<b>Indiana</b>	Indiana Office of the Attorney General; 1-800-457-8283; <a href="https://www.in.gov/attorneygeneral/">https://www.in.gov/attorneygeneral/</a>	
<b>Iowa</b>	Iowa Office of the Attorney General; 1-888-777-4590; <a href="http://www.iowaattorneygeneral.gov/">http://www.iowaattorneygeneral.gov/</a>	
<b>Kansas</b>	Kansas Office of the Attorney General; 1-800-432-2310; <a href="http://www.ag.ks.gov/">http://www.ag.ks.gov/</a>	
<b>Kentucky</b>	Kentucky Office of the Attorney General; 1-888-432-9257; <a href="https://ag.ky.gov/">https://ag.ky.gov/</a>	
<b>Louisiana</b>	Louisiana Office of the Attorney General; 1-800-351-4889; <a href="http://www.ag.state.la.us/">http://www.ag.state.la.us/</a>	
<b>Maine</b>	Maine Attorney General's Office; 1-800-436-2131; <a href="http://www.maine.gov/ag">http://www.maine.gov/ag</a>	
<b>Maryland</b>	Maryland Office of the Attorney General; 888-743-0023; <a href="http://www.marylandattorneygeneral.gov/">http://www.marylandattorneygeneral.gov/</a>	
<b>Massachusetts</b>	Massachusetts Office of the Attorney General; 617-727-8400; <a href="https://www.mass.gov/">https://www.mass.gov/</a>	
<b>Michigan</b>	Michigan Office of the Attorney General; 517-335-0855; <a href="http://www.michigan.gov/ag">http://www.michigan.gov/ag</a>	
<b>Minnesota</b>	Office of the Attorney General; 1-800-657-3787; <a href="http://www.ag.state.mn.us/">http://www.ag.state.mn.us/</a>	
<b>Mississippi</b>	Mississippi Office of the Attorney General; 1-800-281-4418; <a href="http://www.ago.state.ms.us/">http://www.ago.state.ms.us/</a>	
<b>Missouri</b>	Missouri Attorney General's Office; 1-800-392-8222; <a href="http://www.ago.mo.gov/">http://www.ago.mo.gov/</a>	
<b>Montana</b>	Montana Department of Justice; 1-800-481-6896; <a href="https://dojmt.gov/consumer">https://dojmt.gov/consumer</a>	
<b>Nebraska</b>	Nebraska Office of the Attorney General; 1-800-727-6432; <a href="http://www.ago.nebraska.gov/">http://www.ago.nebraska.gov/</a>	
<b>Nevada</b>	Nevada Office of the Attorney General; 702-486-3132; <a href="http://www.ag.nv.gov/">http://www.ag.nv.gov/</a>	
<b>New Hampshire</b>	New Hampshire Office of the Attorney General; 1-888-468-4454; <a href="http://www.doj.nh.gov/consumer">http://www.doj.nh.gov/consumer</a>	
<b>New Jersey</b>	Department of Law and Public Safety; 1-800-242-5846; <a href="http://www.njconsumeraffairs.gov/">http://www.njconsumeraffairs.gov/</a>	
<b>New Mexico</b>	Office of Attorney General; 1-844-255-9210; <a href="http://www.nmag.gov/">http://www.nmag.gov/</a>	
<b>New York</b>	Office of the Attorney General; 1-800-771-7755; <a href="http://www.ag.ny.gov/">http://www.ag.ny.gov/</a>	
<b>North Carolina</b>	North Carolina Office of the Attorney General; 1-877-566-7226; <a href="http://www.ncdoj.gov/">http://www.ncdoj.gov/</a>	
<b>North Dakota</b>	Office of the Attorney General; 1-800-472-2600; <a href="https://www.attorneygeneral.nd.gov/">https://www.attorneygeneral.nd.gov/</a>	
<b>Ohio</b>	Ohio Office of the Attorney General; 1-800-282-0515; <a href="http://www.ohioattorneygeneral.gov/">http://www.ohioattorneygeneral.gov/</a>	
<b>Oklahoma</b>	Oklahoma Office of the Attorney General; 405-521-3921; <a href="http://www.oag.ok.gov/">http://www.oag.ok.gov/</a>	
<b>Oregon</b>	Oregon Department of Justice; 1-877-877-9392; <a href="http://www.doj.state.or.us/consumer">http://www.doj.state.or.us/consumer</a>	
<b>Pennsylvania</b>	Pennsylvania Office of the Attorney General; 1-800-441-2555; <a href="http://www.attorneygeneral.gov/">http://www.attorneygeneral.gov/</a>	
<b>Puerto Rico</b>	Puerto Rico Department of Consumer Affairs; 787-722-7555; <a href="http://www.pr.gov/CaruselServicios">http://www.pr.gov/CaruselServicios</a>	
<b>Rhode Island</b>	Rhode Island Department of the Attorney General; 401-274-4400; <a href="http://www.riag.state.ri.us/">http://www.riag.state.ri.us/</a>	
<b>South Carolina</b>	South Carolina Department of Consumer Affairs; 1-800-922-1594; <a href="http://www.consumer.sc.gov/">http://www.consumer.sc.gov/</a>	
<b>South Dakota</b>	South Dakota Office of the Attorney General; 1-800-300-1986; <a href="http://atg.sd.gov/">http://atg.sd.gov/</a>	
<b>Tennessee</b>	Tennessee Office of the Attorney General; 615-741-1671; <a href="http://www.tn.gov/attorneygeneral">http://www.tn.gov/attorneygeneral</a>	

**Texas** Texas Office of the Attorney General; 1-800-621-0508; <https://www.texasattorneygeneral.gov/>  
**Utah** Utah Office of the Attorney General; 1-800-244-4636; <https://attorneygeneral.utah.gov/>  
**U.S. Virgin Islands** V.I. Department of Licensing and Consumer Affairs; 340-773-2226; <http://www.dlca.vi.gov/>  
**Vermont** Vermont Office of the Attorney General; 1-800-649-2424; <http://ago.vermont.gov/>  
**Virginia** Virginia Office of the Attorney General; 1-800-552-9963; <http://www.oag.state.va.us/>  
**Washington** Washington Office of the Attorney General; 1-800-551-4636; <http://www.atg.wa.gov/>  
**West Virginia** Office of the Attorney General; 1-800-368-8808; <http://www.ago.wv.gov/>  
**Wisconsin** Wisconsin Department of Justice; 1-800-998-0700; <https://www.doj.state.wi.us/>  
**Wyoming** Office of the Attorney General; 1-800-438-5799; <http://ag.wyo.gov/cpu>  
**District of Columbia** DC Office of the Attorney General and Public Advocacy; 202-442-9828; <http://oag.dc.gov>