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CONSUMER PROTECTION

WILSON ELSER

WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP

October 14, 2022

Anjali C. Das
312.821.6164 (direct)
Anjali.Das@wilsonelser.com

Via Certified Mail; Return Receipt Requested

Attorney General John Formella
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Cybersecurity Incident Involving The Opportunity Alliance

Dear Attorney General Formella:

Wilson Elser Moskowitz Edelman and Dicker LLP ("Wilson Elser") represents The Opportunity Alliance ("TOA"), a community action agency located at 50 Lydia Ln, South Portland, ME 04106, with respect to a recent cybersecurity incident that was first discovered by TOA on September 16, 2022 (hereinafter, the "Incident"). TOA takes the security and privacy of the information in its control very seriously, and has taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the Incident, what information may have been compromised, the number of residents being notified, and the steps that TOA has taken in response to the Incident. We have also enclosed hereto a sample of the notification made to the potentially impacted individuals, which includes an offer of free credit monitoring services.

1. Nature of the Incident

On September 16, 2022, TOA discovered an inadvertent disclosure regarding the personally identifiable information ("PII") of some of TOA's former employees. Immediately following discovery, TOA launched an internal investigation into the event to determine the nature and scope of the incident. TOA concluded a mailing packet sent to a small subset of former employees included a list that contained other individuals' sensitive personal information. TOA promptly notified the impacted individuals on October 14, 2022.

Although TOA is unaware of any fraudulent misuse of information, it is possible that individuals' full name, address, and Social Security number may have been exposed as a result of this unauthorized activity.

As of this writing, TOA has not received any reports of related identity theft since the date of the incident (September 16, 2022 to present).

2. Number of New Hampshire residents affected.

A total of two (2) New Hampshire residents may have been potentially affected by this incident. Notification letters to these individuals were mailed on October 14, 2022, by first class mail. A sample copy of the notification letter is included with this letter under **Exhibit A**.

3. Steps taken in response to the Incident.

TOA is committed to ensuring the security and privacy of all personal information in its control, and is taking steps to prevent a similar incident from occurring in the future. Upon discovery of the Incident, TOA moved quickly to investigate and respond to the Incident, assessed the security of its systems, and notified the potentially affected individuals. Specifically, TOA will place additional internal controls when sensitive information is handled, provide additional training for staff involved in this event, and will continue to take steps to mitigate the risk of future harm.

Although TOA is not aware of any actual or attempted misuse of the affected personal information, TOA offered eighteen (18) months of complimentary credit monitoring and identity theft restoration services through CyberScout to all individuals to help protect their identity. Additionally, TOA provided guidance on how to better protect against identity theft and fraud, including providing information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and the contact details for the Federal Trade Commission.

4. Contact information

TOA remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at Anjali.Das@WilsonElser.com or 312-821-6164.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP

Anjali C. Das

EXHIBIT A

The Opportunity Alliance
<Return Address>
<City> <State> <Zip>

The Opportunity Alliance

Via First-Class Mail

<First Name> <Last Name>
<Address1> <Address2>
<City>, <State> <Zip>

October 14, 2022

Re: Notice of Data Security Incident

Dear <First Name> <Last Name>,

The Opportunity Alliance ("TOA") is writing to inform you of a recent data security incident that may have resulted in an unauthorized access to your sensitive personal information. While we are unaware of any fraudulent misuse of your personal information at this time, we are providing you with details about the incident, steps we are taking in response, and resources available to help you protect against the potential misuse of your information.

What Happened?

On September 16, 2022, TOA discovered an inadvertent disclosure regarding the personally identifiable information ("PII") of some of TOA's former employees. Immediately following discovery, TOA launched an internal investigation into the incident to determine the nature and scope of the incident. TOA concluded the retirement plan mailing packet sent to you included a list that contained yours and other individuals' sensitive personal information (the "Sheet"). TOA advises you to destroy and purge the Sheet containing the PII received from TOA. Do NOT forward or disseminate to third parties any copies of the Sheet containing the PII pertaining to TOA's former employees.

What Information Was Involved?

Although TOA has no evidence that any sensitive information has been misused by third parties as a result of this incident, we are notifying you out of an abundance of caution and for purposes of full transparency. Based on the investigation, the following information related to you may have been subject to unauthorized access: name; address; date of hire at TOA, date of birth; Social Security number; retirement balance; and TOA contract number.

What We Are Doing

Data privacy and security is among TOA's highest priorities, and we are committed to doing everything we can to protect the privacy and security of the personal information in our care. Since the discovery of the incident, TOA moved quickly to investigate, respond, and confirm the security of our systems. Specifically, TOA will put in to place additional internal controls when sensitive information is handled, provide additional training for staff involved in this event, and will continue to take steps to mitigate the risk of future harm.

* Services marked with an "*" require an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

In light of the incident, we are also providing you with complimentary credit monitoring and identity theft restoration services. While we are covering the cost of these services, you will need to complete the activation process by following the instructions below.

What You Can Do

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious or unauthorized activity. Additionally, security experts suggest that you contact your financial institution and all major credit bureaus to inform them of such a breach and then take whatever steps are recommended to protect your interests, including the possible placement of a fraud alert on your credit file. Please review the enclosed *Steps You Can Take to Help Protect Your Information*, to learn more about how to protect against the possibility of information misuse.

Representatives are available for 90 days from the date of this letter, to assist you with questions regarding this incident, between the hours of 8:00 am to 8:00 p.m. Eastern Standard Time, Monday through Friday. Please call the help line 1-800-405-6108 and supply the fraud specialist with your unique code listed below. To extend these services, enrollment in the monitoring services described below is required.

Additionally, we are providing you with access to Single Bureau Credit Monitoring* services at no charge. These services provide you with alerts for <<18/24 months>> from the date of enrollment when changes occur to your credit file. This notification is sent to you the same day that the change or update takes place with the bureau. In addition, we are providing you with proactive fraud assistance to help with any questions that you might have or in the event that you become a victim of fraud. These services will be provided by Cyberscout through Identity Force, a company specializing in fraud assistance and remediation services.

To enroll in Credit Monitoring* services at no charge, please log on to https://secure.identityforce.com/benefit/opportunityalliance and follow the instructions provided. When prompted please provide the following unique code to receive services: <CODE HERE> In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter.

We would like to reiterate that, at this time, there is no evidence that your information was misused. However, we encourage you to take full advantage of the services offered.

For More Information

If you have any questions or concerns not addressed in this letter, please call 1-800-405-6108 (toll free) Monday through Friday, during the hours of 8:00 a.m. and 8:00 p.m. Eastern Standard Time.

TOA sincerely regrets any concern or inconvenience this matter may cause, and remains dedicated to ensuring the privacy and security of all information in our control.

Sincerely,

The Opportunity Alliance

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Steps You Can Take to Help Protect Your Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at https://www.consumer.ftc.gov/articles/0155-free-credit-reports) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone or online. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years.

Experian	**TransUnion**	**Equifax**
P.O. Box 9554	P.O. Box 2000	P.O. Box 105069
Allen, TX 75013	Chester, PA 19016	Atlanta, GA 30348
1-888-397-3742	1-800-680-7289	1-800-525-6285
www.experian.com/fraud/center.html	www.transunion.com/fraud-alerts	https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/

Monitoring: You should always remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and by monitoring your credit report for suspicious or unusual activity.

Security Freeze: You have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Experian	**TransUnion**	**Equifax**
P.O. Box 9554	P.O. Box 160	P.O. Box 105788
Allen, TX 75013	Woodlyn, PA 19094	Atlanta, GA 30348-5788
1-888-397-3742	1-888-909-8872	1-888-298-0045
www.experian.com/freeze/center.html	www.transunion.com/credit-freeze	https://www.equifax.com/personal/credit-report-services/credit-freeze/

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting

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agencies, 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. You can obtain further information on how to file such a complaint by way of the contact information listed above. Instances of known or suspected identity theft should also be reported to law enforcement.

For residents of *Iowa*: State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of *Massachusetts*: It is required by state law that you are informed of your right to obtain a 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.

For residents of *New Mexico*: State law advises you to review personal account statements and credit reports, as applicable, to detect errors resulting from the security breach. You have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violators. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act at www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For residents of *Oregon*: State law advises you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of *Rhode Island*: It is required by state law that you are informed of your right to file or obtain a police report in regard to this incident.

For residents of *Arizona, Colorado, District of Columbia, Illinois, Maryland, New York, North Carolina,* and *Rhode Island*: You can obtain information from the Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Federal Trade Commission - Consumer Response Center: 600 Pennsylvania Ave, NW, Washington, DC 20580; 1-877-IDTHEFT (438-4338); www.identitytheft.gov

Arizona Office of the Attorney General Consumer Protection & Advocacy Section, 2005 North Central Avenue, Phoenix, AZ 85004 1-602-542-5025

Colorado Office of the Attorney General Consumer Protection 1300 Broadway, 9th Floor, Denver, CO 80203 1-720-508-6000 www.coag.gov

District of Columbia Office of the Attorney General – Office of Consumer Protection: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; www.oag.dc.gov

Illinois office of the Attorney General - 100 West Randolph Street, Chicago, IL 60601; 1-866-999-5630; www.illinoisattorneygeneral.gov

Maryland Office of the Attorney General - Consumer Protection Division: 200 St. Paul Place, 16th floor, Baltimore, MD 21202; 1-888-743-0023; www.oag.state.md.us

New York Office of Attorney General - Consumer Frauds & Protection: The Capitol, Albany, NY 12224; 1-800-771-7755; https://ag.ny.gov/consumer-frauds/identity-theft

North Carolina Office of the Attorney General - Consumer Protection Division: 9001 Mail Service Center, Raleigh, NC 27699; 1-877-566-7226; www.ncdoj.com

Rhode Island Office of the Attorney General - Consumer Protection: 150 South Main St., Providence RI 02903; 1-401-274-4400; www.riag.ri.gov

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