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SENT VIA ELECTRONIC MAIL

November 30, 2022

New Hampshire Office of the Attorney General
Office of Consumer Protection
Email: DOJ-CPB@doj.nh.gov

CONFIDENTIAL TREATMENT/FOIA EXEMPTION REQUESTED

Dear Sir/Madam:

We write on behalf of our client Orion Systems Integrators, LLC. (“Orion”) to notify you that Orion recently identified an intrusion on certain of its systems by an unauthorized third party. Orion took immediate action to review this incident and secure its systems. Orion’s review determined that certain data files were accessible to the unauthorized third party for a period of time. Orion subsequently performed an assessment of these data files and determined, on November 1, 2022, that some of the files contained certain personal information for 5 residents of New Hampshire. The unauthorized access to files containing personal information occurred between July 25, 2022 and July 26, 2022.

After becoming aware of the incident, Orion undertook a review, working with third party experts, to determine the nature and scope of the unauthorized access. After the review, Orion implemented additional security measures to help further protect against this type of incident going forward. After conducting a comprehensive analysis of the compromised data to determine the affected individuals, Orion determined that the incident potentially affected 5 New Hampshire residents’ Social Security numbers.

Orion is taking action to provide assistance to potentially affected individuals. Orion will notify affected individuals by mail on November 30, 2022 and will provide 24 months of credit monitoring services from TransUnion. Orion has also provided information about steps that individuals can take to protect themselves, such as regularly monitoring financial statements and credit reports. A template copy of the notification letter Orion has sent to affected New Hampshire residents is attached to this notice as Appendix A.

Thank you for your attention to this matter.

Sincerely,

Brenda R. Sharton
Brenda.Sharton@Dechert.com

cc: Bailey E. Dervishi, Esq.
Bailey.Dervishi@Dechert.com

APPENDIX A



PO Box 290245 | Nashville, TN | 37229-9715

<<Month Day, Year>>

<<First name>> <<Middle Name>> <<Last Name>>
<<Address 1>>
<<Address 2>>
<<City>>, <<State>> <<Zip>>

Notice of Data Breach

Dear <<First name>> <<Last Name>>,

We write to notify you of a recent incident that occurred that could affect some of your personal information. Please review this letter carefully.

What Happened

Orion Systems Integrators, LLC. (“Orion”) recently identified an intrusion on certain of its systems by an unauthorized third party. We took immediate action to review this incident and secure our systems. We reviewed this incident and determined that certain data files were accessible to the unauthorized third party for a period of time. We subsequently performed an assessment of these data files and determined, on November 1, 2022, that some of the files contained certain personal information when the unauthorized third party had access to them (the review determined that to be from July 25 to July 26, 2022). <<variable text 1>>

What Information Was Involved

From the review, we have determined that the personal information affected may include your name, address, <<variable text 2>> While we do not know whether the third party actually viewed or exfiltrated your information, we are sending you this notice as a precaution and to encourage you to take steps to monitor your personal information. At this time, *we are not aware of any misuse of or fraudulent activity relating to anyone’s personal information as a result of this incident.*

What We Are Doing

After becoming aware of the incident, Orion undertook a review, working with third-party experts, to determine the nature and scope of the unauthorized access and ensure it was contained. After the review, we implemented additional security measures to help further protect against this type of incident going forward.

As an added precaution we are offering complimentary access to TransUnion’s myTrueIdentity for 24 months, at no cost to you.

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

- Ensure that you enroll by February 28, 2023 (Your code will not work after this date)
- Visit the myTrueIdentity website to enroll: www.mytrueidentity.com
- Provide your activation code: <<reference_id>>
- Follow the three steps to receive your credit monitoring service online

If you do not have access to the Internet and wish to enroll in a similar offline, paper based, credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at 1-855-288-5422. When

prompted, enter the following 6-digit telephone pass code 699544 and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

Additional details of the TransUnion myTrueIdentity service are provided in the enclosed "Additional Resources."

What You Can Do

As always, we recommend that you remain vigilant for incidents of fraud and identity theft, including by regularly viewing your account statements and monitoring your free credit reports. <<variable text 3>>For more information on how you can help protect yourself, please review the enclosed "Additional Resources."

For More Information

We regret any concern or inconvenience caused by this incident. If you have further questions or concerns, please call 1-866-221-5741 toll-free, Monday through Friday from 8:00 a.m. to 5:00 p.m. Central Time, excluding major US holidays. <<variable text 4>>

Sincerely,

Raj Patil
CEO

Additional Resources

Additional Details Regarding Your 24-Month TransUnion myTrueldentity Membership

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (myTrueldentity) for 24 months provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies. Once you are enrolled, you will be able to obtain 24 months of unlimited access to your TransUnion credit report and VantageScore® credit score by TransUnion. The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion®, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The service also includes the ability to lock and unlock your TransUnion credit report online, access to identity restoration services that provides assistance in the event your identity is compromised to help you restore your identity and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.) You can sign up for the myTrueldentity online Credit Monitoring service anytime between now and January 12, 2023. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have credit file at TransUnion®, or an address in the United States (or its territories) and a valid Social Security number, or are under the age of 18. Enrolling in this service will not affect your credit score. If you have questions about your myTrueldentity online credit monitoring benefits, need help with your online enrollment, or need help accessing your credit report, or passing identity verification, **please contact the myTrueldentity Customer Service Team toll-free at: 1-844-787-4607**, Monday-Friday: 8am-9pm, Saturday-Sunday: 8am-5pm Eastern time.

Monitor Your Accounts

We recommend that you regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

- **Equifax®** -- P.O. Box 740241, Atlanta, GA 30374-0241 – 1-800-685-1111 – www.equifax.com
- **Experian** -- P.O. Box 9701, Allen, TX 75013-9701 – 1-888-397-3742 – www.experian.com
- **TransUnion** – P.O. Box 1000, Chester, PA 19016-1000 – 1-800-888-4213 – www.transunion.com

When you receive your credit reports, review them carefully. Look for accounts or creditor inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number that is not accurate. If you see anything you do not understand, call the credit reporting agency at the telephone number on the report.

Credit Freeze

You have the right to put a security freeze, also known as a credit freeze, on your credit file, so that no new credit can be opened in your name without the use of a Personal Identification Number (PIN) that is issued to you when you initiate a 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 access your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. Should you wish to place a credit freeze, please contact all three major consumer reporting agencies listed below.

- **Equifax®** -- P.O. Box 105788, Atlanta, GA 30348-5788 – 1-800-685-1111 – www.equifax.com/personal/credit-report-services
- **Experian** -- P.O. Box 9554, Allen, TX 75013-9554 – 1-888-397-3742 – www.experian.com/freeze/center.html
- **TransUnion** – P.O. Box 2000, Chester, PA 19016-2000 – 1-800-909-8872 – www.transunion.com/credit-freeze

You must separately place a credit freeze on your credit file at each credit reporting agency. The following information should be included when requesting a credit freeze:

- 1) Full name, with middle initial and any suffixes;

- 2) Social Security number;
- 3) Date of birth (month, day, and year);
- 4) Current address and previous addresses for the past five (5) years;
- 5) Proof of current address, such as a current utility bill or telephone bill;
- 6) Other personal information as required by the applicable credit reporting agency.

If you request a credit freeze online or by phone, then the credit reporting agencies have one (1) business day after receiving your request to place a credit freeze on your credit file report. If you request a lift of the credit freeze online or by phone, then the credit reporting agency must lift the freeze within one (1) hour. If you request a credit freeze or lift of a credit freeze by mail, then the credit agency must place or lift the credit freeze no later than three (3) business days after getting your request.

Fraud Alerts

You also have the right to place an initial or extended fraud alert on your file at no cost. An initial fraud alert lasts 1-year and is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting 7 years. Should you wish to place a fraud alert, please contact any one of the agencies listed below. The agency you contact will then contact the other two credit agencies.

- **Equifax**[®] -- P.O. Box 105788, Atlanta, GA 30348-5788 – 1-888-766-0008 – www.equifax.com/personal/credit-report-services
- **Experian** -- P.O. Box 9554, Allen, TX 75013-9554 – 1-888-397-3742 – www.experian.com/fraud/center.html
- **TransUnion** – P.O. Box 2000, Chester, PA 19016-2000 – 1-800-909-8872 – www.transunion.com/fraud-victim-resource/place-fraud-alert

Additional Information

You can further educate yourself regarding identity theft and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC. Under Rhode Island 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.

- **The Federal Trade Commission** – 600 Pennsylvania Avenue, NW, Washington, DC 20580 – 1-877-438-4338 – TTY 1-866-653-4261 – www.ftc.gov/idtheft

District of Columbia residents can obtain information from the Office of the Attorney General for the District of Columbia about steps you can take to avoid identity theft: 400 6th Street NW, Washington, D.C. 20001 – 1-202-727-3400 – oag.dc.gov.

Maryland residents can obtain information from the Maryland Attorney General about steps you can take to avoid identity theft: 200 St. Paul Place, 25th Floor, Baltimore, MD 21202 – 1-888-743-0023 – marylandattorneygeneral.com.

Massachusetts residents have the right to obtain any police report filed in regard to this incident. You also have the right to file a police report and obtain a copy of it if you are the victim of identity theft. Under Massachusetts law, you may also place, lift, or remove a security freeze on your credit reports, free of charge. You must place your request for a freeze with each of the three major consumer reporting agencies as detailed above.

New York residents can obtain additional information regarding security breach response and identity theft prevention and protection from the New York Department of State Division of Consumer Protection. (1-800-697-1220; <https://dos.nysits.acsifactory.com/consumer-protection>) and the New York State Attorney General (1-800-771-7755; <http://www.ag.ny.gov/home.html>).

North Carolina residents can obtain additional information about preventing identity theft from the North Carolina Attorney General: North Carolina Attorney General's Office - Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001 - 877-566-7226 (Toll-free within North Carolina) - 919-716-6000 - www.ncdoj.gov.

Rhode Island residents have the right to obtain any police report filed in regard to this incident. You also have the right to file a police report and obtain a copy of it if you are the victim of identity theft.