



**MULLEN
COUGHLIN_{LLC}**
ATTORNEYS AT LAW

STATE OF NH
DEPT OF JUSTICE
2020 NOV -9 PM 3:03

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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

November 3, 2020

VIA U.S. MAIL

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

Re: Notice of Data Event

Dear Sir or Madam:

We represent Payette Associates Inc. ("Payette") located at 290 Congress Street, Fifth Floor, Boston, MA 02210-1005 and are writing to notify your Office of an incident that may affect the privacy of some personal information relating to fifteen (15) New Hampshire residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Payette does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

On September 25, 2020, Payette discovered certain systems on its network were encrypted due a malware infection. Payette immediately began an investigation, with the assistance of a third-party forensic specialist, to assess the nature and scope of the incident. Payette's investigation determined that an unauthorized actor accessed its network and further accessed certain information stored on the network. Therefore, Payette conducted a review of information potentially impacted by this incident to determine the type of information at issue and to whom the information related. On October 19, 2020, Payette completed its review and identified contact information for potentially impacted individuals. Although unaware of any actual or attempted misuse of information as a result of this incident, Payette notified potentially impacted individuals. The information that could have been subject to unauthorized access included name, address, Social Security number, and financial account number.

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Notice to New Hampshire Residents

On November 3, 2020, Payette provided written notice of this incident to affected individuals, which included fifteen (15) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, Payette moved quickly to investigate and respond to the incident, assess the security of its systems, and notify potentially affected individuals. Payette also reviewed its current policies and procedures related to network security and implemented additional safeguards. Payette is providing individuals whose personal information was potentially affected by this incident with access to two (2) years of credit monitoring through TransUnion at no cost to the individuals.

Additionally, Payette is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud. Payette is providing individuals with 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 encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. Payette is also notifying regulators as required.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4815.

Very truly yours,



Michael J. Bonner of
MULLEN COUGHLIN LLC

MJB/pls
Enclosure

EXHIBIT A



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

RE: Notice of Data Security Incident

Dear <<Name 1>>:

Payette Associates Inc. (“Payette”) is writing to inform you of an incident that may affect the privacy of some of your personal information. Although we have no evidence of actual or attempted misuse of information potentially affected by this incident, this letter provides details of the incident, our investigation, and steps you can take to help protect your information should you feel it is appropriate to do so.

What Happened? On September 25, 2020, Payette discovered certain systems on our network were encrypted due to a malware infection. We immediately began an investigation, with the assistance of a third-party forensic specialist, to assess the nature and scope of the incident. Our investigation determined that an unauthorized actor accessed our network and further accessed certain information stored on the network. Therefore, we conducted a comprehensive review of information potentially impacted by this incident to determine the type of information at issue and to whom the information related. Although we are unaware of any actual or attempted misuse of information as a result of this incident, we are notifying you because your information is stored on our network.

What Information Was Involved? We determined that the type of information potentially impacted by this incident includes your name, address, Social Security number, and financial account number.

What We Are Doing. Payette takes the security of personal information in our care very seriously. Upon discovering this incident, we moved quickly to securely restore our systems, investigate, and notify potentially impacted individuals. As part of our ongoing commitment to the security of information, we notified law enforcement, and we are reviewing our existing policies and procedures related to network security.

What Can You Do? Although we have no evidence of actual or attempted misuse of information as a result of this incident, we arranged to have TransUnion provide credit monitoring and identity protection services to you for two (2) years at no cost to you as an added precaution. Please review the enclosed *Steps You Can Take to Protect Your Information* for instructions on how to enroll in these services.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 888-905-0784 (toll free), Monday through Friday from 9:00 am to 9:00 pm Eastern Time.

We sincerely regret any inconvenience this incident may cause you. Payette remains committed to safeguarding information in our care, and we will continue to take proactive steps to enhance the security of our systems.

Sincerely,

Sarah N. Lindenfeld, AIA
Managing Principal
Payette Associates Inc.

Steps You Can Take to Protect Your Information

Activate Identity Monitoring

How to Enroll: You can sign up online or via U.S. mail delivery.

To enroll in this service, go to the *myTrueIdentity* website at www.MyTrueIdentity.com and, in the space referenced as “Enter Activation Code,” enter the 12-letter Activation Code << **Activation Code** >> and follow the three steps to receive your credit monitoring service online within minutes.

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 six-digit telephone passcode << **Engagement Number** >>..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.

You can sign up for the online or offline credit monitoring service anytime between now and << **Enrollment Deadline** >>. 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 a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

Monitor Your Accounts

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 activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

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

www.experian.com/freeze/center.html

TransUnion
P.O. Box 160
Woodlyn, PA 19016
1-888-909-8872

[www.transunion.com/
credit-freeze](http://www.transunion.com/credit-freeze)

Equifax
P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111

[www.equifax.com/personal/
credit-report-services](http://www.equifax.com/personal/credit-report-services)

In order to request a security freeze, you will 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.); and
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.

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your file at no cost. An initial fraud alert is a 1-year alert that 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 seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Experian
P.O. Box 2002
Allen, TX 75013
1-888-397-3742

www.experian.com/fraud/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-680-7289

[www.transunion.com/
fraud-victim-resource/
place-fraud-alert](http://www.transunion.com/fraud-victim-resource/place-fraud-alert)

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008

[www.equifax.com/personal/
credit-report-services](http://www.equifax.com/personal/credit-report-services)

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 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. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-410-528-8662, www.oag.state.md.us.

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6000, www.ncdoj.gov. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, RI 02903; www.riag.ri.gov, 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 22 Rhode Island residents impacted by this incident.

For New York residents, the Attorney General may be contacted at Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <https://ag.ny.gov/>.

For Washington, D.C. residents, the Office of Attorney General for the District of Columbia can be reached at 441 4th Street NW, Suite 1100 South, Washington, D.C. 20001; 1-202-442-9828; <https://oag.dc.gov>.