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MAR 20 2020

CONSUMER PROTECTION

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March 20, 2020

**VIA FEDERAL EXPRESS**

NH Department of Justice  
Gordon J. MacDonald, Attorney General  
33 Capitol Street  
Concord, NH 03301

**Re: PEF Services LLC - Notice of Data Breach**

Dear Attorney General MacDonald:

This firm represents PEF Services LLC ("PEF"), relevant to the above referenced matter. By correspondence, dated February 24, 2020, this firm provided notice, pursuant to New Hampshire statute, of a data security incident involving the personal information of 3 New Hampshire residents. Please accept the following as a supplemental notice regarding an additional 3 New Hampshire residents whose personal information may have also been involved.

As previously reported, while performing penetration testing on its environment, PEF learned that an actor exploited a vulnerability on its webserver. Following this discovery, PEF took steps to promptly rectify the vulnerability, including taking the compromised server offline. An investigation also was launched to determine the nature and scope of the activity. On January 29, 2020, it was determined that a third-party gained unauthorized access to and downloaded files on the subject webserver between November and December 2019. On February 24, 2020, notification letters were sent, via U.S. mail, to 3 New Hampshire residents whose personal information may have been impacted.

Thereafter, as the investigation continued, directory files thought to have been deleted, were discovered on February 21, 2020. These directory files contained information for additional New Hampshire residents, and may have also been on the impacted server. The type of information that may have been involved includes: tax forms and Subscription Agreements, which included, among other things, first and last name, address, email address, Social Security number, EIN, and other financial account information.

Although, to date, PEF is unaware of any actual or attempted misuse of these additional New Hampshire residents' personal information, PEF is sending notification letters to the New Hampshire residents out of an abundance of caution. In furtherance of same, PEF has also secured the services of Kroll to provide various identity theft monitoring services at no cost to these individuals for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of

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March 20, 2020  
Page 2

confidential data. A template copy of the notification letter, which was sent, via U.S. mail, on or about March 20, 2020, is enclosed for your reference.

Should you require any additional information, please do not hesitate to contact me.

Very truly yours,

**CONNELL FOLEY LLP**

A handwritten signature in black ink, appearing to read "K Painter Randall", written in a cursive style.

**KAREN PAINTER RANDALL**

KPR/sak  
Enclosure



March 20, 2020

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<b2b\_text\_2 (Business Name)>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country >>

## Notice of Data Breach

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>,

PEF Services LLC ("PEF") is a fund administrator that provided services to <<b2b\_text\_1 (Name of Client)>>. We write to notify you of a recent incident that may affect the security of your personal information that PEF stored while providing services to <<b2b\_text\_1 (Name of Client)>>. While there is currently no evidence that your information has been misused, we are providing you with information regarding the event, measures we have taken, and what you may do to help safeguard your personal information should you feel it appropriate to do so.

### What happened?

While performing penetration testing on its environment, PEF learned that an actor exploited a vulnerability on its webserver. Following this discovery, PEF took steps to promptly rectify the vulnerability, including taking the compromised server offline. An investigation also was launched to determine the nature and scope of the activity. On January 29, 2020, it was determined that a third-party gained unauthorized access to and downloaded files on the subject webserver between November and December 2020. Moreover, as the investigation continued, it was determined on February 21, 2020, that the directory files thought to have been deleted and containing your information may have been on the impacted webserver.

### What information was involved?

Although, to date, we are unaware of any actual or attempted misuse of your personal information, we are notifying you out of an abundance of caution because the following information may have been on this server at the time of the incident: tax forms and Subscription Agreements, which included, among other things, first and last name, address, email address, Social Security number, EIN, and other financial account information.

### What we are doing.

We have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, a Current Credit Report, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.idheadquarters.com> to activate and take advantage of your identity monitoring services.

*You have until **June 30, 2020** to activate your identity monitoring services.*

Membership Number: <<Member ID>>

Additional information describing your services is included with this letter.

**What you can do.**

We encourage you to take advantage of the identity theft services being offered. Also, please review the enclosed "Additional Resources" section included with this letter. This section describes additional steps you can take to help protect yourself, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file. Furthermore, please remain vigilant in reviewing your account statements and monitoring free credit reports. It is recommended that you regularly review credit card account statements and your credit report for unauthorized activity. If you detect any suspicious activity on an account, we recommend that you contact your issuing bank immediately to freeze or close the account.

**For more information.**

If you have questions, please call 1-844-930-2573, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time. Please have your membership number ready.

Protecting your information is important to PEF and <<b2b\_text\_1 (Name of Client)>> and we are committed to your security and satisfaction. We regret any inconvenience this incident may have caused you and we trust that the services we are offering will help minimize that inconvenience and restore your faith in our commitment to you.

Sincerely,

Anne Anquillare, CFA  
CEO and President  
PEF Services LLC

## ADDITIONAL RESOURCES

### Contact information for the three nationwide credit reporting agencies:

**Equifax**, PO Box 740241, Atlanta, GA 30374, [www.equifax.com](http://www.equifax.com), 1-800-685-1111

**Experian**, PO Box 2104, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742

**TransUnion**, PO Box 2000, Chester, PA 19022, [www.transunion.com](http://www.transunion.com), 1-800-888-4213

**Free Credit Report.** It is recommended that you remain vigilant by reviewing account statements and monitoring your credit report for unauthorized activity that may indicate fraud and identity theft. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting agencies.

To order your annual free credit report please visit [www.annualcreditreport.com](http://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 from the U.S. Federal Trade Commission's ("FTC") website at [www.consumer.ftc.gov](http://www.consumer.ftc.gov)) to:

Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

### **For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents:**

You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

**Fraud Alerts:** There are two types of fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies.

**Security Freeze.** You have the ability to place a security freeze, also known as a credit freeze, on your credit report free of charge.

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 may use an online process, an automated telephone line, or submit written request to any of the three credit reporting agencies listed above. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, 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.

**Federal Trade Commission and State Attorneys General Offices.** If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your home state. You may also contact these agencies for information on how to minimize or prevent the risks of identity theft.

You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, [www.ftc.gov/bcp/edu/microsites/idtheft/](http://www.ftc.gov/bcp/edu/microsites/idtheft/), 1-877-IDTHEFT (438-4338).

**For Maryland residents:** You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, [www.oag.state.md.us](http://www.oag.state.md.us), 1-888-743-0023.

**For North Carolina residents:** You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, [www.ncdoj.gov](http://www.ncdoj.gov), 1-877-566-7226.

**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 Connecticut residents:** You may contact the Connecticut Office of the Attorney General, 55 Elm Street, Hartford, CT 06106, 1-860-808-5318, [www.ct.gov/ag](http://www.ct.gov/ag).

**For Massachusetts residents:** You may contact the Office of the Massachusetts Attorney General, One Ashburton Place, Boston, MA 02108, 1-617-727-8400, [www.mass.gov/ago/contact-us.html](http://www.mass.gov/ago/contact-us.html)

## **TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES**

You've been provided with access to the following services<sup>1</sup> from Kroll:

### **Triple Bureau Credit Monitoring and Single Bureau Credit Report**

Your current credit report is available for you to review. You will also receive alerts when there are changes to your credit data at any of the three national credit bureaus—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

### **Web Watcher**

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

### **Public Persona**

Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you'll receive an alert.

### **Quick Cash Scan**

Quick Cash Scan monitors short-term and cash-advance loan sources. You'll receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.

### **\$1 Million Identity Fraud Loss Reimbursement**

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

<sup>1</sup> Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.