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RECEIVED

AUG 24 2018

CONSUMER PROTECTION

August 20, 2018

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

RE: Notification of Data Security Breach Incident

Dear Sir/Madam:

This letter is being sent in accordance with state law to inform your office that information about 4 New Hampshire residents may have been subject to unauthorized access through one of our client's service providers. The information impacted was provided by our client Bank of the West to its service provider in connection with data analysis services relating to our business banking customers. The information included the business name (which could be an individual person's name as a DBA) and a business taxpayer identification number (which could be an individual's Social Security Number in the case of a sole proprietorship). The service provider advised the Bank that unauthorized third parties used compromised credentials to log into a limited number of their employee email accounts and may have accessed the information of the impacted New Hampshire residents. The Bank does not have information that the individual data has been misused but, in an abundance of caution, is notifying the affected individuals of the incident. We have enclosed a copy of the notice letter that we will be mailing to affected individuals on August 20, 2018 pursuant to 15 U.S.C. §6801 – 6809 and the associated Interagency Guidance on Response Programs for Unauthorized Access to Customer Information and Customer Notice.

The three Consumer Reporting Agencies have not been notified of this incident. Immediately upon receipt of notification of this incident from the service provider, the Bank confirmed that the service provider has engaged a cybersecurity forensics firm, notified federal law enforcement and taken steps to enhance their security protocols. The Bank is offering the affected individuals one year of Identity Guard®, a credit monitoring and identity theft protection service provided by Intersections Inc. (NASDAQ: INTX), a leading provider of consumer and corporate identity risk management services.

Should you have any additional questions, you may contact me directly at (213) 488-7362.

Sincerely,

Catherine D. Meyer  
Senior Counsel

August 20, 2018

Customer Name  
Street Address  
City, State Zip

LS 0818-088

Dear **Customer Name**,

I am writing to notify you about an information security incident involving your business information.

**What Happened?**

On March 2, 2018, we were notified of a security incident that occurred at one of our contracted service providers who furnishes Bank of the West with business data analysis services relating to our business banking customers. The service provider's investigation determined that unauthorized third parties used compromised credentials to log into a limited number of their employee email accounts and may have accessed information associated with your business. On March 19, 2018, we received a copy of the data file that may have been illegally accessed. We immediately took action, however, the data file was not in an easily useable format and required significant analysis to identify potentially affected individuals and associated mailing addresses.

**What Information Was Involved?**

The data file contained certain personal information provided to Bank of the West in a business context, including your business name (which may be an individual person's name) and a business identification number (which may be a Social Security number, such as in the case of a sole proprietorship). While the information is technically business-related and it is unknown if the file in question was actually accessed and compromised, we are nevertheless providing notification to you about this unfortunate situation out of an abundance of caution given the potential inclusion of your personal name, along with your personal Social Security number in relation to the business.

**What We Are Doing?**

We take this matter very seriously and regret any inconvenience. Our investigation indicates that the responsible service provider took steps to enhance their security protocols, engaged a cybersecurity forensics firm, and notified Federal law enforcement as soon as they identified the issue. As a result of this unfortunate situation, Bank of the West would like to offer you a year of free credit monitoring and identity theft protection services as a courtesy. Please refer to the **Other Important Information** section of this letter for enrollment information.

**What You Can Do**

Bank of the West recommends closely reviewing all of your account statements for suspicious activity. If you find anything suspicious or fraudulent, you should call the Bank at the telephone number listed on your account statement. As a reminder, in general, if you become aware of unauthorized transactions on your account and promptly report those transactions to the Bank, you will not be responsible for unauthorized withdrawals, transfers, or purchases made using your debit card.

You have the right to obtain a copy of your credit report for free once a year from each credit reporting agency. You can obtain a free credit report by visiting [www.annualcreditreport.com](http://www.annualcreditreport.com), by calling (877) 322-8228, or by completing the Annual Credit Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281 Atlanta, GA 30348-5281. We suggest you remain vigilant over the next 12 to 24 months by checking your account statements monthly and requesting your free credit report from one bureau at a time every four months. If you have questions regarding the information appearing on your credit report, please call the credit agency at the telephone number on the credit report.

*Please see reverse for additional information*

If you do find suspicious activity on your credit report, call your local police or sheriff's office and file a report of identity theft. Get a copy of the police report, as you may need to give copies of the police report to creditors to clear up your records. It is also recommended that you report any incidents of identity theft to Bank of the West, as well as to the Federal Trade Commission (FTC). The FTC can be contacted toll-free at (877) 438-4338 (877-ID-THEFT). You can visit the FTC's website at: [www.identitytheft.gov](http://www.identitytheft.gov).

In addition to reviewing your credit report, you have the right to place an initial "fraud alert" on your credit file. You can do this by calling any one of the three credit reporting agencies at the telephone numbers shown below. Doing so will let you automatically place fraud alerts with all three agencies, and you will be sent information on how you can order a free credit report from each of the agencies. The "fraud alert" will stay on your credit report for 90 days. After that you can renew the alert for additional 90-day periods by calling any one of the three agencies:

Equifax  
(888) 766-0008  
P.O. Box 740241  
Atlanta, GA 30374-0241  
[www.equifax.com](http://www.equifax.com)

Experian  
(888) 397-3742  
P.O. Box 9532  
Allen, TX 75013  
[www.experian.com](http://www.experian.com)

TransUnion  
(800) 680-7289  
P.O. Box 2000  
Chester, PA 19016  
[www.transunion.com](http://www.transunion.com)

If you want to learn more about the steps you can take to avoid identity theft, visit the Federal Trade Commission's website. The FTC runs the U.S. government's identity theft information website, at [www.identitytheft.gov](http://www.identitytheft.gov). You can also contact the FTC via telephone at (877) ID-THEFT (877-438-4338). The FTC and the consumer reporting agencies can also provide you with additional information about using fraud alerts and security freezes to protect your information.

#### **Other Important Information**

#### **COMPLIMENTARY SERVICE OFFER**

Bank of the West is offering you a free one-year subscription to Identity Guard<sup>®</sup>, a credit monitoring and identity theft protection service. Identity Guard provides essential monitoring and protection of not only credit data, but also alerts you of certain activities that could indicate potential identity theft. This program is provided by Intersections Inc. (NASDAQ: INTX), a leading provider of consumer and corporate identity risk management services.

#### **Identity Guard<sup>®</sup> features include:**

- 3-Bureau Credit Report and Scores\*
- 3-Bureau Daily Monitoring with NOTIFY EXPRESS<sup>®</sup> Alerts
- 3-Bureau Quarterly Credit Update
- Victim Assistance
- Credit Education Specialists
- Up to \$20,000 identity theft insurance with \$0 deductible\*\*

If you wish to take advantage of this monitoring service, you must enroll by October 20, 2018.

*\*The scores you receive with Identity Guard<sup>®</sup> are provided for educational purposes to help you understand your credit. They are calculated using the information contained in your Equifax, Experian and TransUnion credit files. Lenders use many different credit scoring systems, and the scores you receive with Identity Guard are not the same scores used by lenders to evaluate your credit.*

Credit scores are provided by CreditXpert<sup>®</sup> based on data from the three major credit bureaus.

\*\*Identity Theft Insurance underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.



# IDENTITY GUARD.

[www.identityguard.com](http://www.identityguard.com)

**Identity Guard's Victim Recovery Services** - one of the many product features available through an Identity Guard subscription.

Customers who believe they are a victim of identity theft should contact the **Identity Guard Customer Service Department at 1-800-452-2541**.

Customers will be assigned a specially trained Dedicated Case Manager for a minimum of 60 days and who acts as the customer's primary point of contact for any Victim Recovery Services activities.

If ever a victim of Identity Theft, Victim Recovery Services Agent will work directly with the customer to:

- **Review the customer's 3-Bureau Credit Report** and if discrepancies are found, the Victim Recovery Services Agent will help you to notify creditors via US mail.
- **Review the customer's account on a regular basis** and if activity occurs, call the customer to confirm the activity is legitimate.
- **Assist customer in placing Fraud Alerts** with the Credit Bureaus.
- **Assist customer with filing disputes** with the Credit Bureaus.
- **Send the customer a summary letter** that outlines certain activities that have been detected that may indicate fraud, a blank uniform Affidavit, contact information for all three Credit Bureaus, as well as a Fraud First Aid Kit.
- **Assist with contacting the Insurance Carrier** to file a claim.
- Discuss additional measures such as filing a police report.

*The information provided by Identity Guard is for informational purposes only and not for the purpose of providing legal advice. You should contact your attorney to obtain advice with respect to any particular issue or problem.*