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OCT 01 2021

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September 28, 2021

**VIA FIRST CLASS MAIL**

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

Re: Notice of Data Security Incident

Dear Attorney General MacDonald:

This notice is provided on behalf of my client, Pinova, Inc. ("Pinova"), following a data breach of Pinova's computer systems that involved the name and Social Security number of one (1) New Hampshire resident, and may have also involved one or more of the following types of information concerning this individual: date of birth, address, and/or driver's license number. Pinova is providing written notice to this individual later today, via U.S. mail. The notice letter describes the incident and the information that was potentially impacted, and includes general advice on how to protect one's identity and obtain free credit reports and security freezes. It also contains an offer of, and instructions to enroll in, 2 years of credit monitoring at no cost to the individual. A copy of the notice letter is enclosed. Additional information about the incident is below.

On August 24, 2021, a ransomware attack was detected that impacted computer systems which are networked with Pinova's computer systems. Pinova immediately engaged legal counsel with an expertise in data security, launched an investigation into the incident and alerted law enforcement. Legal counsel also hired cybersecurity experts to assist with the investigation to better understand what happened, and more importantly, to prevent something like this from happening again.

Through its ongoing investigation, Pinova discovered that the cybercriminals gained unauthorized access to files within Pinova's computer systems on June 30, 2021. Since then, Pinova has worked to determine whose information may have been included and locate those individuals so that it could provide proper notice of the incident. On September 1, 2021, Pinova learned that the compromised information included the personal information of one (1) New Hampshire resident.

Because cyber threats are always evolving, Pinova continuously evaluates and modifies its IT security protocols so that sensitive data is protected to the greatest extent possible. In addition, to further enhance its network security and help prevent similar occurrences in the future, Pinova has taken, or will be taking, the following steps:

1. Closely monitoring and implementing higher restrictions on outside access to our network;
2. Initiating a global password reset exercise in order to achieve strong and unique passwords;
3. Enhancing network intrusion detection and response;
4. Expanding multi-factor authentication requirements to access digital services for employee accounts;
5. Strengthening our email filtering security services to help block dangerous emails;
6. Increasing security requirements around allowed workstations;
7. Increased frequency of security software patching;
8. Updating our incident response procedures to more quickly and effectively respond to incidents;
9. Enhancing our employee cyber security training and providing regular communications in order to increase cyber awareness.

In addition, consistent with our compliance obligations and responsibilities, we are providing notice of this incident to appropriate state regulators, including your office.

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

/s/ Sandy B. Garfinkel, Esq.

SBG/  
Enclosure



September 28, 2021

«FIRST\_NAME» «LAST\_NAME»  
«Address»  
«City», «State» «ZIP\_Code»

***IMPORTANT INFORMATION – PLEASE REVIEW CAREFULLY  
NOTICE OF DATA SECURITY INCIDENT***

Dear «FIRST\_NAME» «LAST\_NAME»:

I am writing regarding a recent security incident that involved some of the information that Pinova, Inc. maintains about certain current or former employees. We are providing this notice to you as a precautionary measure, to inform you of the incident, explain the complimentary credit monitoring services that we are providing to you, and let you know that we continue to take significant measures to protect your information.

**What Happened**

On August 24, 2021, a ransomware attack was detected that impacted computer systems which are networked with Pinova's computer systems. We immediately engaged legal counsel with an expertise in data security, launched an investigation into the incident and alerted law enforcement. Legal counsel also hired cybersecurity experts to assist with the investigation so that we could better understand what happened, and more importantly, prevent something like this from happening again.

Through our ongoing investigation, we discovered that the cybercriminals gained unauthorized access to files within our computer systems. Since then, we have worked to determine whose information may have been included and locate those individuals so that we could provide proper notice of the incident. On September 1, 2021, we learned that the compromised information may have included your personal information.

**What Information Was Involved**

Based on the investigation, the information that may have been potentially accessed included your name, date of birth, address, driver's license number or Social Security number.

**What We Are Doing**

We are investing in internal processes, tools, and resources to reduce the likelihood that this could happen again. Because cyber threats are always evolving, we are continuously working to identify and mitigate threats when they occur. We evaluate our IT security protocols on a continual basis to make sure that sensitive data is protected to the greatest extent possible. In addition, to further enhance our network security and help prevent similar occurrences in the future, we have taken, or will be taking, the following steps:

1. Closely monitoring and implementing higher restrictions on outside access to our network;
2. Initiating a global password reset exercise in order to achieve strong and unique passwords;
3. Enhancing network intrusion detection and response;

4. Expanding multi-factor authentication requirements to access digital services for employee accounts;
5. Strengthening our email filtering security services to help block dangerous emails;
6. Increasing security requirements around allowed workstations;
7. Increased frequency of security software patching;
8. Updating our incident response procedures to more quickly and effectively respond to incidents;
9. Enhancing our employee cyber security training and providing regular communications in order to increase cyber awareness.

In addition, consistent with our compliance obligations and responsibilities, we are providing notice of this incident to appropriate state regulators.

### **What You Can Do**

Out of an abundance of caution, we recommend that you take the following preventative measures to help detect and mitigate any misuse of your information:

1. Enroll in a complimentary, two-year membership with Experian. This membership will provide you with identity monitoring services, including a copy of your credit report at signup; credit monitoring; identity restoration; Experian IdentityWorks ExtendCARE™; and up to \$1 million in identity theft insurance. Instructions on how to activate your membership are included at the end of this letter.
2. Remain vigilant for incidents of fraud and identity theft by regularly reviewing and monitoring your account statements and free credit reports for any unauthorized or suspicious activity. Information on additional ways to protect your information, including how to obtain a free credit report and free security freeze, can be found at the end of this letter.
3. Report any incidents of suspected identity theft to your local law enforcement, state Attorney General, and the major credit bureaus.

### **For More Information**

We are very sorry that this incident happened and for any inconvenience you may have experienced. The privacy and security of your information is very important to us and we remain committed to doing everything we can to maintain the confidentiality of your information.

If you have any questions or concerns regarding this incident, please call us at 888-397-0064, between 9 am – 11 pm EST, Monday – Friday, or 11 am – 8 pm EST, Saturday – Sunday.

Sincerely,



Matthew Furner, President  
Pinova, Inc.



## MORE INFORMATION ABOUT IDENTITY THEFT AND WAYS TO PROTECT YOURSELF

Visit [www.experian.com/credit-advice/topic-fraud-and-identity-theft.html](http://www.experian.com/credit-advice/topic-fraud-and-identity-theft.html) for general information regarding identity protection. You can obtain additional information about fraud alerts, security freezes, and preventing identity theft from the consumer reporting agencies listed below and the Federal Trade Commission (FTC) by calling its identity theft hotline: 877-438-4338; TTY: 1-866-653-4261. They also provide information online at [www.consumer.ftc.gov/features/feature-0014-identity-theft](http://www.consumer.ftc.gov/features/feature-0014-identity-theft). The FTC's address is: Federal Trade Commission, Division of Privacy and Identity Protection, 600 Pennsylvania Avenue, NW, Washington, DC 20580. You have the ability to place a security freeze on your credit reports by contacting the following agencies.

### National Credit Reporting Agencies Contact Information

<b>Equifax</b> P.O. Box 105788 Atlanta, GA 30348 1-888-298-0045 <a href="http://www.equifax.com">www.equifax.com</a>	<b>Experian</b> P.O. Box 9554 Allen, TX 75013 1-888-397-3742 <a href="http://www.experian.com">www.experian.com</a>	<b>TransUnion</b> P.O. Box 160 Woodlyn, PA 19094 1-888-909-8872 <a href="http://www.transunion.com">www.transunion.com</a>
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You also may request a security freeze be added to your credit report at Experian's online Freeze Center, [www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html), by phone at 1-888-EXPERIAN (1-888-397-3742), or by mail to Experian Security Freeze, P.O. Box 9554, Allen, TX 75013. More information on a security freeze can be found below.

### Obtain Your Credit Report

You should also monitor your credit reports. You may periodically obtain your credit reports from each of the national consumer reporting agencies. In addition, under federal law, you are entitled to one free copy of your credit report every 12 months from each of the three nationwide consumer reporting agencies listed above. You may obtain a free copy of your credit report by going to [www.AnnualCreditReport.com](http://www.AnnualCreditReport.com) or by calling (877) 322-8228. You also may complete the Annual Credit Report Request Form available from the FTC at [www.consumer.ftc.gov/articles/pdf-0093-annual-report-request-form.pdf](http://www.consumer.ftc.gov/articles/pdf-0093-annual-report-request-form.pdf) and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. You may also contact any of the three major consumer reporting agencies to request a copy of your credit report.

If you discover inaccurate information or a fraudulent transaction on your credit report, you have the right to request that the consumer reporting agency delete that information from your credit report file. Even if you do not find any suspicious activity on your initial credit reports, the FTC recommends that you check your credit reports periodically, which can help spot and address problems quickly.

**For Colorado, Georgia, Maryland, and New Jersey 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.

### Fraud Alerts

You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at [www.annualcreditreport.com](http://www.annualcreditreport.com).

### Security Freeze

You have the ability to place a security freeze on your credit report at no cost to you. 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 be able to use an online process, an automated telephone line, or a 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; (5) a legible copy of a government-issued identification card, (6) proof of current address, such as a legible copy of a recent utility bill or bank or insurance statement, (7) a legible copy of a recent W-2, pay stub, or Social Security card, and (8) if you are a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. **Under federal law, you cannot be charged to place, lift, or remove a security freeze.**

After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place, you will need it if you choose to lift the freeze. If you do place a security freeze *prior* to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

### **Additional Helpful Information**

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, file a police report with your local law enforcement agency and contact your Attorney General. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC at the information provided above.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name, or to commit fraud or other crimes against you, you may file a police report in the city in which you currently reside.

## **STATE SPECIFIC INFORMATION**

**MARYLAND residents:** You may also obtain information about preventing and avoiding identity theft from the Maryland Attorney General's Office. This office can be reached at:

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

**NEW MEXICO residents:** 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 a violator. 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. You can review your rights pursuant to the Fair Credit Reporting Act by visiting [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://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.

**NEW YORK residents:** You may also obtain information on identity theft from the New York Department of State Division of Consumer Protection or the New York Attorney General. These agencies can be reached at:

New York Department of State  
Division of Consumer Protection  
1-800-697-1220  
<http://www.dos.ny.gov/consumerprotection>

New York Attorney General  
1-800-771-7755  
<http://www.ag.ny.gov/home.html>

**NORTH CAROLINA residents:** You may also obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office. This office can be reached at:

North Carolina Department of Justice  
Attorney General's Office  
9001 Mail Service Center  
Raleigh, NC 27699  
[www.ncdoj.gov](http://www.ncdoj.gov)  
Toll-free: 1-877-566-7226

**RHODE ISLAND residents:** You have the right to file and obtain a copy of a police report concerning any fraud or identity theft committed using your personal information. You may also obtain information about preventing and avoiding identity theft from the Rhode Island Attorney General's Office. This office can be reached at:

Office of the Attorney General  
150 South Main Street  
Providence, RI 02903  
[www.riag.ri.gov](http://www.riag.ri.gov)  
Toll-free: 1-401-274-4400



**ADDITIONAL DETAILS REGARDING YOUR 24-MONTH  
EXPERIAN IDENTITYWORKS MEMBERSHIP:**

TO ACTIVATE YOUR MEMBERSHIP AND START MONITORING YOUR PERSONAL INFORMATION PLEASE FOLLOW THE STEPS BELOW:

- Ensure that you **enroll by: December 31, 2021** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: [www.experianidworks.com/3bcredit](http://www.experianidworks.com/3bcredit)
- Provide your

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at \_\_\_\_\_ by **December 31, 2021**. Be prepared to provide engagement number \_\_\_\_\_ is proof of eligibility for the identity restoration services by Experian. A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.\*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance\*\*:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at **877.890.9332**. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for one year from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration). You will also find self-help tips and information about identity protection at this site.

\* Offline members will be eligible to call for additional reports quarterly after enrolling

\*\* The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.