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July 1, 2021

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Attorney General John Formella
Consumer Protection Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
DOJ-CPB@doj.nh.gov

Re: Data Incident

General Formella:

We write on behalf of our client, The Producer Group, LLC D/B/A The Todd Organization (“Todd”), to inform you of a recent security incident that involved the personal information of 27 New Hampshire residents.

In November 2020, Netgain Technology, LLC (“Netgain”), a third-party provider based in St. Cloud, MN that offers cloud storage to Todd and many other organizations, reported that it experienced a ransomware incident that resulted in encryption of certain Netgain systems. Netgain reported the incident to law enforcement and worked with forensic investigators. Following its investigation, Netgain notified its customers that it suffered a ransomware incident in which an unknown actor may have accessed or acquired certain customer data. We understand that Netgain paid the ransom and was able to recover the files.

Todd was informed that their files were potentially impacted on December 16, 2020. Upon receiving that information, Todd worked diligently to determine what information was impacted, which involved an extensive investigation, collaboration with Netgain, and a manual review of impacted data files. On June 1, 2021, Todd concluded its review of the files and determined that impacted file(s) may have contained personal information related to executive benefits or other insurance plans, although we are not aware that this incident resulted in any actual or attempted misuse of personal information or other harm to any person.

Information impacted in the Netgain security incident varied by individual, but may have included names, insurance policy number(s), contact information, social security numbers, driver’s license numbers, financial information, and health information used for underwriting insurance coverage.

Attorney General John Formella

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July 1, 2021

While we are unaware of any actual or attempted misuse of personal information as a result of this incident, as a protective measure, Todd is providing notice of this incident and offering complimentary access to Experian IdentityWorksSM for 24 months. The details of this offering are in the attached template letter, which was sent to the individuals in New Hampshire.

Please let us know if further information would be helpful.

Sincerely,

A handwritten signature in black ink that reads "Edward R. McNicholas". The signature is written in a cursive style with a large, stylized initial "E".

Edward R. McNicholas



Return Mail Processing
 PO Box 589
 Claysburg, PA 16625-0589

July 1, 2021

G5683-L01-0000001 T00001 P001 *****SCH 5-DIGIT 32808



SAMPLE A. SAMPLE - L01 NON-MA
 APT ABC
 123 ANY ST
 ANYTOWN, ST 12345-6789



RE: Notice of Data Breach

Dear Sample A. Sample:

The Todd Organization (“Todd”) is a group of independent consultants that assist corporate employers and financial institutions in designing, administering, and informally funding non-qualified executive benefit plans.

We are writing with important information regarding a data security incident involving a third-party cloud service provider which may have affected your personal information related to executive benefits or other insurance plans. Although we are unaware of any actual or attempted misuse of your information at this time, we want to provide you with information about the incident and the steps we are taking in response to guard against any potential disruptions.

What Happened? In November 2020, Netgain Technology, LLC (“Netgain”), a third-party provider based in St. Cloud, MN that offers cloud storage to organizations like Todd, reported that it experienced a ransomware incident that resulted in encryption of certain Netgain systems. Netgain reported the incident to law enforcement and worked with forensic investigators.

Following its investigation, Netgain notified its customers that it suffered a ransomware incident in which an unknown actor may have accessed or acquired certain customer data. We understand that Netgain paid the ransom and was able to recover the files. Upon learning that Todd files were potentially impacted on December 16, 2020, we worked diligently to determine what information was impacted, which involved an extensive investigation, collaboration with Netgain, and a manual review of impacted data files. On June 1, 2021, we concluded our review of the files and determined that impacted file(s) may have contained your personal information related to executive benefits or other insurance plans, although we are not aware that this incident resulted in any actual or attempted misuse of personal information or other harm to any person.

What Information Was Involved? Information impacted in the Netgain security incident varied by individual, but may have included names, insurance policy number(s), contact information, social security numbers, driver’s license numbers, financial information, and health information used for underwriting insurance coverage.



What We Are Doing. We take this incident and the security of personal information in our care very seriously. Upon becoming aware of the Netgain security incident, we immediately took steps to investigate the event. While we are unaware of any actual or attempted misuse of personal information as a result of this incident, as a protective measure, we are providing notice of this incident so that you may take further steps to protect your personal information should you feel it is appropriate to do so. To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 months.

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. 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 from the date of the incident (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 Identity Restoration is available to you for 24 months 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.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 24-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** September 30, 2021 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/RR1Bplus>
- Provide your **activation code**: [REDACTED]

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 (833) 549-2143 by September 30, 2021. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the Identity Restoration services by Experian. You may also visit <https://www.experianidworks.com/thetoddorganization/> for more information.

ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

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 file for indicators of fraud.
- **Internet Surveillance:** Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- **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.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.
- **Lost Wallet:** Provides assistance with canceling/replacing lost or stolen credit, debit, and medical cards.
- **Child Monitoring:** For 10 children up to 18 years old, Internet Surveillance and monitoring to determine whether enrolled minors in your household have an Experian credit report are available. Also included are Identity Restoration and up to \$1M Identity Theft Insurance**.

What You Can Do. Please review the enclosed *Information about Identity Theft Protection* for additional information on how to protect against identity theft and fraud. You may also take advantage of the complimentary identity protection services being offered.

For More Information. We sincerely regret any inconvenience or concern caused by this incident. If you have further questions or concerns, or would like an alternative to enrolling online, please call (833) 549-2143 toll-free Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number B013857. You may also visit <https://www.experianidworks.com/thetoddorganization/> for more information.

Sincerely,



John Iezzi
President

*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.



Information about Identity Theft Protection

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](http://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](http://www.experian.com/freeze/center.html)

TransUnion
P.O. Box 2000
Chester, PA 19016-2000
1-888-909-8872
[www.transunion.com/
credit-freeze](http://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](http://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](http://www.experian.com/fraud/center.html)

TransUnion
P.O. Box 2000
Chester, PA 19016-2000
1-800-680-7289
[www.transunion.com/fraud-
victim-resource/place-fraud-alert](http://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.

The Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
1-877-ID-THEFT (1-877-438-4338)
TTY: 1-866-653-4261
www.ftc.gov/idtheft

State Specific Information

California Residents: Visit the California Office of Privacy Protection (www.oag.ca.gov/privacy) for additional information on protection against identity theft.

Iowa Residents: You may contact law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity theft. This office can be reached by visiting the website at www.iowaattorneygeneral.gov, calling (515) 281-5164 or requesting more information from the Office of the Attorney General, Hoover State Office Building, 1305 E. Walnut Street, Des Moines, IA 50319.

Kentucky Residents: Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov, Telephone: 1-502-696-5300.

Maryland Residents: Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 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, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

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/>.

North Carolina Residents: Office of the Attorney General of North Carolina, Consumer Protection Division, 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 1-919-716-6400, 877-566-7226 (toll free within NC).



Oregon Residents: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392.

Rhode Island Residents: Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, Telephone: 401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 10 Rhode Island residents impacted by this incident.

Vermont Residents: You may learn helpful information about fighting identity theft, placing a security freeze, and obtaining a free copy of your credit report on the Vermont Attorney General's website at <http://www.atg.state.vt.us>.

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