

July 13, 2016

**VIA EMAIL**  
**(ATTORNEYGENERAL@DOJ.NH.GOV) AND**  
**FEDERAL EXPRESS**

The Honorable Joseph Foster  
Attorney General of the State of New Hampshire  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

***Re: Notification of Cybersecurity Incident Potentially Affecting New Hampshire  
Residents Pursuant to N.H. Rev. Stat. § 359-C:20***

Dear Madam/Sir:

We represent Project Management Institute (“PMI”) in connection with a recent incident that may have impacted the security of certain personal information of 36 New Hampshire residents. Pursuant to N.H. Rev. Stat. § 359-C:20 PMI is reporting potential unauthorized access to this information.

The investigation of this incident is ongoing, and this notice will be supplemented, if necessary, with any new significant facts discovered after its submission. By providing this notice, PMI does not waive any potential rights or defenses regarding applicability of New Hampshire law or personal jurisdiction in connection with this incident.

**Background of the Incident**

PMI is a not-for-profit professional membership association for the project, program and portfolio management profession. PMI is headquartered in Newtown Square, Pennsylvania, but it provides services to customers throughout the United States.

PMI was informed on June 14, 2016, that one of its vendors, Comnet Marketing Group, Inc. (“Comnet”), had been the victim of a potential computer intrusion. An unauthorized user gained administrative access to Comnet’s systems on April 23-24, 2016, and issued commands

# VEDDER PRICE.

Office of the Attorney General

July 13, 2016

Page 2

to delete all the data housed on Comnet's servers. That data may have included certain PMI customer credit card information that Comnet had collected on behalf of PMI. Comnet did not discover any evidence indicating that the credit card data was accessed or acquired by an unauthorized user or that the unauthorized user intended to steal data. But Comnet says it has been unable to definitively rule out any unauthorized access to or acquisition of data because data potentially relevant to its forensic investigation was deleted by the unauthorized user. Thus, PMI provides this notice out of an abundance of caution.

Upon becoming aware of the potential incident, Comnet immediately launched an investigation to determine whether a security incident had occurred. Specifically, Comnet hired experts to assist in the investigation and response, and has referred this matter to appropriate law enforcement. Consumer credit card information is no longer contained in or accessible via Comnet's systems. Additionally, PMI has terminated its relationship with Comnet, and Comnet no longer serves as a vendor for PMI. No intrusion of PMI's computer systems occurred during this incident.

PMI is providing notice to certain New Hampshire residents that their names, postal mailing addresses, email addresses, phone numbers, credit card numbers, CVV codes, and expiration dates may have been impacted.

## **Notice to the New Hampshire Residents**

On or about July 14, 2016, PMI is notifying the 36 potentially affected New Hampshire residents of the incident. Enclosed is a sample of the notification letter that will be sent to the New Hampshire residents via United States first-class mail.

In addition, PMI has established a call center 888-246-1970 that customers can contact between the hours of 9:00 AM and 9:00 PM Eastern Time to ask questions and to receive further information regarding the incident. PMI has arranged to offer one (1) year of complimentary credit monitoring through Equifax to the affected New Hampshire residents.

## **Contact Information**

Please contact me if you have any questions or if I can provide you with any further information concerning this matter. Thank you.

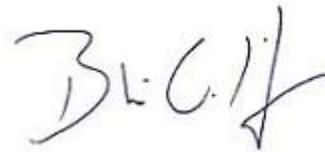
VEDDER PRICE.

Office of the Attorney General

July 13, 2016

Page 3

Sincerely,

A handwritten signature in black ink, appearing to read "Blaine C. Kimrey". The signature is stylized with a large initial "B" and a long, sweeping flourish at the end.

Blaine C. Kimrey

cc: PMI



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

<<mail id>>  
<<Name1>>  
<<Address1>>  
<<Address2>>  
<<City>><<State>><<Zip>>

<<Date>>

Dear <<Name 1>>,

Project Management Institute (“PMI”) is committed to the privacy of our customers and the security of their information. As part of this commitment, we are providing you this notice regarding an information security incident that could affect you.

### **What Happened**

PMI was informed on June 14, 2016, that one of its vendors, Comnet Marketing Group, Inc. (“Comnet”), had been the victim of an intrusion of its computer systems. An unauthorized user gained administrative access to Comnet’s systems on April 23-24, 2016, and issued commands to delete all the data housed on Comnet’s servers. That data may have included certain PMI customer credit card information that Comnet had collected on behalf of PMI. Comnet did not discover any evidence indicating that the credit card data was accessed or acquired by an unauthorized user or that the unauthorized user intended to steal data. But Comnet has been unable to definitively rule out any unauthorized access to or acquisition of data. Thus, PMI provides this notice out of an abundance of caution.

### **What Information Was Involved**

The information potentially at risk included your name, postal mailing address, email address, phone number, credit card number, CVV code, and expiration date.

### **What We Are Doing**

**Investigation.** Comnet has referred this matter to appropriate law enforcement, and Comnet’s investigation regarding the potential responsible parties is ongoing.

**Mitigation.** We have hired Equifax to provide, at no cost to you, credit monitoring services. The details for opting in to these services is set forth below.

**Protection Against Further Harm.** No intrusion of PMI’s computer systems occurred during this incident and your information is no longer contained in or accessible via Comnet’s systems. Additionally, PMI has terminated its relationship with Comnet, and Comnet no longer serves as a vendor for PMI.

### **What You Can Do**

Although we do not have any evidence that your information was accessed or misused as a result of this computer security incident, your information may be at risk. To help protect you, we have partnered with Equifax® to provide its Credit Watch Gold identity theft protection product for one year at no charge to you. A description of this product is provided in the attached material, which also contains instructions about how to enroll (including your personal activation code). If you choose to take advantage of this product, it will provide you with a notification of any changes to your credit information, up to \$25,000 Identity Theft Insurance Coverage and access to your credit report. You must complete the enrollment process by October 31, 2016. We urge you to consider enrolling in this product, at our expense, and reviewing the Additional Resources enclosed with this letter.

Remain vigilant for any unauthorized use of your credit card information. We suggest that you review your credit card account statements and monitor your credit reports, which you can obtain for free from the three credit reporting agencies listed below. If you feel your credit card information may have been compromised, consider contacting your credit card company and having its cancel your current card and reissue a new card. If you suspect incidents of identity theft, you should notify local law enforcement and/or your state attorney general. We are also contacting the following credit report companies regarding the computer security incident:

Equifax  
P.O. Box 105788  
Atlanta, GA 30348  
(800) 525-6285  
www.equifax.com

Experian  
P.O. Box 9554  
Allen, TX 75013  
(888) 397-3742  
www.experian.com

TransUnion  
Fraud Victim Asst. Div.  
P.O. Box 6790  
Fullerton, CA 92834  
(800) 680-7289  
www.transunion.com

### **For More Information**

If you have questions and concerns please contact our toll free number, 888-246-1970 between the hours of 9:00 AM and 9:00 PM Eastern Time. Additionally, for more information about avoiding identity theft, you can contact the Federal Trade Commission at 600 Pennsylvania Ave. N.W., Washington, D.C. 20580, 1-877-ID-THEFT, [consumer.ftc.gov](http://consumer.ftc.gov). Residents of Maryland may also obtain information about avoiding identity theft from the Maryland Office of the Attorney General, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, [www.oag.state.md.us](http://www.oag.state.md.us). Residents of North Carolina may also obtain information about avoiding identity theft from the North Carolina Attorney General's Office, 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, [www.ncdoj.gov](http://www.ncdoj.gov).

Sincerely,

Project Management Institute

By: Mark Emery  
Director of Integrated Services



Activation Code: <<Code>>

About the Equifax Credit Watch™ Gold identity theft protection product

Equifax Credit Watch will provide you with an “early warning system” to changes to your credit file. Note: You must be over age 18 with a credit file in order to take advantage of the product.

Equifax Credit Watch provides you with the following key features and benefits:

- Comprehensive credit file monitoring and automated alerts of key changes to your **Equifax** credit report
- Wireless alerts and customizable alerts available (available online only)
- Access to your Equifax Credit Report™
- Up to \$25,000 in identity theft insurance with \$0 deductible, at no additional cost to you †
- Live agent Customer Service 7 days a week from 8 a.m. to 3 a.m. to assist you in understanding the content of your Equifax credit information, to provide personalized identity theft victim assistance, and help initiate an investigation of inaccurate information.
- 90 day Fraud Alert placement with automatic renewal functionality\* (available online only)

**How to Enroll: You can sign up online or over the phone**

To sign up online for **online delivery** go to [www.myservices.equifax.com/gold](http://www.myservices.equifax.com/gold)

1. Welcome Page: Enter the Activation Code provided at the top of this page in the “Activation Code” box and click the “Submit” button.
2. Register: Complete the form with your contact information (name, gender, home address, date of birth, Social Security Number and telephone number) and click the “Continue” button.
3. Create Account: Complete the form with your email address, create a User Name and Password, check the box to accept the Terms of Use and click the “Continue” button.
4. Verify ID: The system will then ask you up to four security questions to verify your identity. Please answer the questions and click the “Submit Order” button.
5. Order Confirmation: This page shows you your completed enrollment. Please click the “View My Product” button to access the product features.

To sign up for **US Mail delivery**, dial 1-866-937-8432 for access to the Equifax Credit Watch automated enrollment process. Note that all credit reports and alerts will be sent to you via US Mail only.

1. Activation Code: You will be asked to enter your enrollment code as provided at the top of this letter.
2. Customer Information: You will be asked to enter your home telephone number, home address, name, date of birth and Social Security Number.
3. Permissible Purpose: You will be asked to provide Equifax with your permission to access your credit file and to monitor your file. Without your agreement, Equifax cannot process your enrollment.
4. Order Confirmation: Equifax will provide a confirmation number with an explanation that you will receive your Fulfillment Kit via the US Mail (when Equifax is able to verify your identity) or a Customer Care letter with further instructions (if your identity can not be verified using the information provided). Please allow up to 10 business days to receive this information.

Directions for placing a Fraud Alert

A fraud alert is a consumer statement added to your credit report. This statement alerts creditors of possible fraudulent activity within your report as well as requests that they contact you prior to establishing any accounts in your name. Once the fraud alert is added to your credit report, all creditors should contact you prior to establishing any account in your name. To place a fraud alert on your credit file, visit: [https://www.alerts.equifax.com/AutoFraud\\_Online/jsp/fraudAlert.jsp](https://www.alerts.equifax.com/AutoFraud_Online/jsp/fraudAlert.jsp) or you may contact the Equifax auto fraud line at 1-877-478-7625, and follow the simple prompts. Once the fraud alert has been placed with Equifax, a notification will be sent to the other two credit reporting agencies, Experian and Trans Union, on your behalf.

† 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. This product is not intended for minors (under 18 years of age)

\* The Automatic Fraud Alert feature made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC

## Perry, Cynthia D

---

**From:** Thayer, Mary  
**Sent:** Wednesday, July 13, 2016 3:42 PM  
**To:** Perry, Cynthia D  
**Subject:** FW: Notification of cybersecurity incident for Project Management Institute  
**Attachments:** PMI - 7.13 NH letter - FINAL.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**From:** Cawelti, Jennifer  
**Sent:** Wednesday, July 13, 2016 3:38 PM  
**To:** Thayer, Mary  
**Subject:** FW: Notification of cybersecurity incident for Project Management Institute

**From:** Clark, Bryan [<mailto:bclark@vedderprice.com>]  
**Sent:** Wednesday, July 13, 2016 3:26 PM  
**To:** AttorneyGeneral  
**Cc:** Kimrey, Blaine C.  
**Subject:** Notification of cybersecurity incident for Project Management Institute

Please see the attached notification of cybersecurity incident on behalf of Project Management Institute. A hard copy will follow via FedEx.

Sincerely,

Bryan Clark

**Bryan K. Clark**, Associate

**VedderPrice**<sup>SM</sup>

T +1 312 609 7810

Assistant: Christina Kim +1 312 609 7830

[web](#) | [email](#) | [offices](#) | [biography](#)

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

CONFIDENTIALITY NOTE: This e-mail is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this e-mail message is not the intended recipient, or the employee or agent responsible for delivery of the message to the intended recipient, you are hereby notified that any dissemination,

distribution or copying of this communication is prohibited. If you have received this e-mail in error, please notify us immediately by telephone at (312) 609-5038 and also indicate the sender's name. Thank you.

Vedder Price P.C. is affiliated with Vedder Price LLP, which operates in England and Wales and with Vedder Price (CA), LLP which operates in California.