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January 27, 2020

Via email – attorneygeneral@doj.nh.gov
Attorney General Gordon MacDonald
Office of the Attorney General
33 Capitol Street
Concord, NH 03302
attorneygeneral@doj.nh.gov

To Attorney General MacDonald:

We represent Rainbow Finance, LLC (“Rainbow”) with respect to a data security incident involving the potential exposure of certain personally identifiable information (“PII”) described in more detail below. Rainbow is a financial institution that offers small loan financing exclusively for dealers and distributors of Rainbow Cleaning Systems. Rainbow is committed to answering any questions you may have about the data security incident, its response, and steps taken to prevent a similar incident in the future.

1. Nature of security incident.

On November 27, 2019, Rainbow learned that a former employee of Rainbow used log-in credentials to an external portal utilized by Rainbow for its internal business processes and viewed PII without authorization. Upon discovery, Rainbow disabled the former employee’s access to the portal, changed passwords, and terminated the employee. Rainbow reported the incident to law enforcement and continues to work with authorities. Rainbow engaged independent computer forensic experts to assist with its investigation into the incident and the former employee’s conduct. The forensic investigation confirmed that the former employee used log-in credentials, username and password, to access the external portal and search the portal for PII without authorization or a proper purpose. The external portal is used by Rainbow to run background checks in order to underwrite and offer loans to dealers and distributors who are applying for financing related to Rainbow Cleaning Systems.

Rainbow worked with forensic investigators to determine what personal information may have been improperly accessed by the former employee, and to identify contact information for impacted individuals. The review concluded on January 8, 2020, at which time Rainbow

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determined that PII such as name, address, Social Security number, driver's license number, and financial account information may have been accessed and/or downloaded.

2. Number of residents affected.

Two (2) New Hampshire residents may have been affected and were notified of the incident. A notification letter was sent to the potentially affected individuals on January 24, 2020 via regular mail (a copy of the form notification letter is enclosed).

3. Steps taken relating to the incident.

Rainbow took steps to address this incident and prevent a similar incident in the future. Rainbow will be retraining its staff on the Fair Credit Reporting Act ("FCRA") and the appropriate uses and disclosures of PII. Rainbow will be restricting access to the external portal. Rainbow will also be conducting a full review of its security protocols to confirm the appropriate controls are in place to protect PII. Rainbow is assisting law enforcement with their investigation. Affected individuals were offered 12 months of credit monitoring and identity protection services through ID Experts.

4. Contact information.

Rainbow takes the security of the information in its control seriously and is committed to ensuring the information in its control is appropriately protected. If you have any questions or need additional information, please do not hesitate to contact me at mventrone@clarkhill.com or (312) 360-2506.

Very truly yours,

CLARK HILL



Melissa K. Ventrone
Partner

Enclosure



C/O ID Experts
10300 SW Greenburg Rd. Suite 570
Portland, OR, 97223

To Enroll, Please Call:
1-800-939-4170
Or Visit:
<https://app.myidcare.com/account-creation/protect>
Enrollment Code:
[XXXXXXXXXX]

<<First Name>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip>>

January 24, 2020

Notice of Data Security Incident

Dear <<First Name>> <<Last Name>>,

We wanted to let you know about a data security incident recently experienced by Rainbow Finance, LLC (“Rainbow”) that may have impacted your personal information. Rainbow is a financial institution that offers small loan financing for dealers and distributors of Rainbow Cleaning Systems and may have access to your personal information through an external portal, which is used to run background checks and obtain credit reports for underwriting purposes. Rainbow takes the privacy and security of your information seriously, and we sincerely apologize for any concern or inconvenience this may cause you. This letter contains information about steps you can take to protect your information and resources we are making available to help you.

What happened?

Rainbow recently learned that a former employee of Rainbow may have accessed and/or downloaded your personal information without authorization through an external portal utilized by Rainbow for its internal business processes. As soon as we learned about this incident, we engaged independent computer forensic experts to assist us with our investigation and determine what information may have been improperly accessed. We reported the incident to law enforcement and continue to work with authorities. The employee that accessed your information without authorization has been disciplined in accordance with our disciplinary policy.

What information was involved?

Rainbow worked with forensic investigators to determine what personal information may have been improperly accessed by the employee, and to identify contact information for impacted individuals. The review concluded on January 8, 2020, and we determined that personal information, such as your name, address, Social Security number, driver’s license number, and financial account information may have been accessed and/or downloaded.

What we are doing?

We want to assure you that we are taking steps to prevent this type of incident from happening in the future. We will be retraining our staff on the Fair Credit Reporting Act (“FCRA”) and the appropriate uses and disclosures of personal information. We will be restricting access to the external portal. We will also be conducting a full review of our security protocols to confirm the appropriate controls are in place to protect personal information. We are also assisting law enforcement with their investigation.

What you can do?

We are offering you a complimentary membership to ID Experts. This product provides you with <<12/24>> months of credit monitoring, identity detection, and resolution of identity theft. Please contact ID Experts with any questions and to enroll in free MyIDCare services by calling 1-800-939-4170 or going to <https://app.myidcare.com/account-creation/protect> and using the Enrollment Code provided above. MyIDCare experts are available Monday through Friday from 9 am - 9 pm Eastern Time. Please note the deadline to enroll is April 24, 2020.

We encourage you to take full advantage of this service offering. Additional information about protecting your identity is included in this letter, 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. It is also a good idea to monitor your credit card and bank statements, as well as your Estimate of Benefits (EOB) for suspicious activity.

For more information:

If you have any questions or concerns, please call 1-800-939-4170 Monday through Friday from 9 am – 9 pm Eastern Time. Your trust is our top priority, and we deeply regret any inconvenience or concern that this matter may cause you.

Sincerely,

Rainbow Finance, LLC

U.S. State Notification Requirements

For residents of Hawaii, Michigan, Missouri, New Mexico, Virginia, Vermont, and North Carolina: It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

For residents of Colorado, Illinois, Iowa, Maryland, Missouri, New Mexico, North Carolina, Oregon, Washington, and West Virginia:

It is required by state laws to inform you that you may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report by contacting any one or more of the following national consumer reporting agencies:

Equifax

P.O. Box 105139
Atlanta, GA 30374
1-800-685-1111
www.equifax.com

Experian

P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion

P.O. Box 6790
Fullerton, CA 92834
1-800-916-8800
www.transunion.com

You may also 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.

For residents of Iowa:

State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon:

State laws advise you to report any suspected identity theft to law enforcement, as well as the Federal Trade Commission.

For residents of Colorado, Maryland, Illinois, North Carolina, and Rhode Island:

You can obtain information from the Maryland, North Carolina, and Rhode Island Offices of the Attorneys General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Maryland Attorney General

Consumer Protection Div.
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
www.oag.state.md.us

North Carolina Attorney General

Consumer Protection Div.
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-566-7226
www.ncdoj.com

Rhode Island Attorney General

Consumer Protection Div.
150 South Main Street
Providence, RI 02903
(401) 274-4400
www.riag.ri.gov

Federal Trade Commission

Consumer Response Center
600 Pennsylvania Avenue,
NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)
www.identityTheft.gov

For residents of Massachusetts:

It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft.

For residents of all states:

Fraud Alerts: You can place fraud alerts with the three credit bureaus at one of the three major credit bureaus by phone and also via each credit bureau's website. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. The contact information for all three credit bureaus is below. As of September 21, 2018, fraud alerts will now last one year, instead of 90 days. Fraud alerts will continue to be free and identity theft victims can still get extended fraud alerts for seven years.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

Security Freeze: 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, each credit reporting agency has a dedicated web page for security freezes and fraud alerts or you can request a freeze by phone or by mail. 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 may also require 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. Effective September 21, 2018, placing a freeze on your credit report is now free for all United States citizens.

It is required by state laws to inform you that you may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze

P.O. Box 105788
Atlanta, GA 30348
www.equifax.com

Experian Security Freeze

P.O. Box 9554
Allen, TX 75013
<http://www.experian.com/freeze>

TransUnion (FVAD)

P.O. Box 2000
Chester, PA 19022
www.transunion.com

More information can also be obtained by contacting the Federal Trade Commission listed above.

