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RECEIVED

MAY 28 2019

May 22, 2019

CONSUMER PROTECTION

NH Department of Justice  
Gordon J. MacDonald, Attorney General  
33 Capitol Street  
Concord, NH 03301

**Re: Notification of Data Security Incident**

Dear Attorney General Gordon J. MacDonald:

Be advised that the undersigned and this law firm have been retained to represent Redtail Technology, Inc. in connection with the recent data security incident described below. Redtail is located at 3131 Fite Cir, Sacramento, CA 95827 and provides customer relationship management services to various financial advisors.

On March 4, 2019, Redtail discovered that its misconfigured logging systems inadvertently captured a small subset of personal information that it stored for advisors via various integrations and retained the data in a debug log file that was accessible to Internet users. The information in the debug file contained personal information such as first and last names, physical addresses, dates of birth, and Social Security numbers. Redtail is uncertain as to when this compromise began. Redtail will notify 56 New Hampshire residents of this incident.

Redtail regularly updates and strengthens its systems and processes to help prevent unauthorized access in coordination with ongoing vulnerability and penetration testing; and will continue to exercise vigilance to help safeguard personal data in its custody. Redtail has implemented a more rigid server deployment workflow as well as implemented active scanning software to alert it of any possible issues in its environments. Since the time the code related to the exposure was introduced, Redtail has also implemented a code review process so that every line of code a developer writes is reviewed and approved by another developer.

Redtail will provide notification to affected individuals on May 24, 2019, via U.S. mail and has partnered with LifeLock, a Symantec company, to make available at no cost to affected individuals for one year its LifeLock Defender™ Preferred solution to adults affected by this incident and its LifeLock Junior™ solution to minors affected by this incident. The LifeLock Defender™ Preferred solution includes one year of credit monitoring and identity theft protection services.

A sample copy of each notice sent to the New Hampshire residents is enclosed.



Respectfully,

**Spencer Fane, LLP**

By:

  
Shawn E. Tunja, Partner

Enclosures:  
Notice of Data Breach



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

<<Date>> (Format: Month Day, Year)

## Notice of Data Breach

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

We are writing to inform you of an incident that affected Redtail Technology that involved your personal information. You may not recognize Redtail Technology. Redtail Technology provides customer relationship management services for financial advisor groups; and in your case, <<FINANCIAL ADVISOR GROUP>> initially collected information about you that is stored in our system. We sincerely apologize and deeply regret that this incident has occurred.

### What Happened?

On March 4, 2019, we discovered that our logging systems inadvertently captured a small subset of personal information that we store for advisors and retained the data in a debug log file that was accessible to Internet users. We are working hard and increasing our efforts to help safeguard your personal data that is in our custody and protect it from future incidents.

### What Information Was Involved?

The debug file contained information such as first and last names, physical addresses, dates of birth, and Social Security numbers. You are receiving this letter because your personal information was contained in the debug file.

### What We Are Doing.

Redtail Technology values your privacy and the trust you and the advisors place in us. We regularly update and strengthen our systems and processes to help prevent unauthorized access in coordination with ongoing vulnerability and penetration testing. We will continue to exercise vigilance to help safeguard your data with us.

We have partnered with LifeLock, a Symantec company, to make available at no cost to you for one year its LifeLock Defender™ Preferred solution. As you may know, LifeLock is an industry leader in providing credit and identity theft monitoring and remediation services and products. Their incident response team has extensive experience in assisting people who have sustained an unintentional exposure of their personal information.

LifeLock Defender™ Preferred is specifically designed to protect your personal information as well as your financial standing and personal identity. In the event that you are impacted by this incident, LifeLock will take all steps necessary to respond to, remediate, and rectify the situation.

**To activate your membership and get protection at no cost to you:**

1. Go to [www.LifeLock.com](http://www.LifeLock.com) and click on the red **START MEMBERSHIP** button.
2. You will be taken to another page where, below the three protection plan boxes, you can enter the promo code: XXXXXXXXXX and click the **APPLY** button.
3. On the next page, enter your Member ID. (Your Member ID is <<MEMBER ID>>).
4. Click the red **START YOUR MEMBERSHIP** button.
5. You will receive a confirmation email after enrollment (be sure to follow all directions in this email).

**You will have until <<DATE>> to enroll in this service.**

Once you have completed the LifeLock enrollment process, the service will be in effect. Your LifeLock Defender™ Preferred membership includes:

- ✓ LifeLock Identity Alert® System†
- ✓ Live, US-Based Priority Member Support 24/7
- ✓ Stolen Funds Reimbursement up to \$25,000 \*
- ✓ Personal Expense Compensation up to \$25,000 \*
- ✓ Service Guarantee for Lawyers and Experts up to \$1 million \*
- ✓ Identity Restoration Support
- ✓ Annual Three-Bureau Credit Reports & Credit Scores<sup>1</sup>  
The credit scores provided are VantageScore 3.0 credit scores based on Equifax, Experian and TransUnion respectively. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your creditworthiness.
- ✓ Three-Bureau Credit Monitoring<sup>1,2</sup>
- ✓ Address Change Verification
- ✓ Bank Account Takeover Alerts†
- ✓ Dark Web Monitoring
- ✓ Fictitious Identity Monitoring
- ✓ Credit Card, Checking and Savings Account Activity & Application Alerts†

<sup>1</sup> Credit reports, scores and credit monitoring may require an additional verification process and credit services will be withheld until such process is complete.

<sup>2</sup> For LifeLock Defender™ Preferred Three-bureau Credit monitoring, credit monitoring from Experian and TransUnion will take several days to begin.

† LifeLock does not monitor all transactions at all businesses.

\* Indicates features included within the Million Dollar Protection™ Package††† No one can prevent all identity theft.

**What You Can Do.**

We encourage you to take full advantage of this LifeLock offering and remain vigilant in protecting your personal information. We are also providing you with the attached Recommended Steps document that includes steps you may take to help protect your personal information.

**For More Information.**

We value the security and privacy of your information and we apologize for any inconvenience or concern caused by this incident. Our relationship with you, your confidence in our ability to safeguard your personal information, and your peace of mind are very important to us.

If you have any questions or need additional information about this notice, we have set up a dedicated support line through LifeLock, available 24/7/365. Please feel free to give us a call at <<**TOLL FREE NUMBER**>>.

Sincerely,

A handwritten signature in black ink, appearing to read "B. McLaughlin", with a stylized flourish at the end.

Brian McLaughlin, CEO

## Recommended Steps to Help Protect Your Information

It is recommended 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. You should report suspected identity theft to law enforcement, including your state's attorney general and the Federal Trade Commission. If you are a victim of identity theft, you may file a police report with your local law enforcement.

You can obtain information from the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft. The FTC can be reached at:

Federal Trade Commission  
Consumer Response Center  
600 Pennsylvania Ave, NW  
Washington, DC 20580  
1-877-IDTHEFT (438-4338)  
[www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)

**Free Credit Report:** You are entitled to one free copy of your credit report every 12 months from each of the three nationwide credit reporting companies. To obtain your free credit report visit [annualcreditreport.com](http://annualcreditreport.com) or call 1-877-322-8228. You will need to provide your name, address, social security number, and date of birth to verify your identity.

**Fraud Alerts:** You can place fraud alerts with the three major credit bureaus by phone and also via their websites. 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.

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

**Security Freeze:** You also have the right to place a security freeze on your credit report. 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 need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, or regular stamped mail, or by following the instructions found at the websites listed below. 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 must also include 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.

You may obtain a security freeze by contacting any one or more of the following national consumer reporting agencies:

<b>Equifax Security Freeze</b>	<b>Experian Security Freeze</b>	<b>TransUnion (FVAD)</b>
P.O. Box 105788	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19022
<a href="http://www.freeze.equifax.com">www.freeze.equifax.com</a>	<a href="http://www.experian.com/freeze">www.experian.com/freeze</a>	<a href="http://freeze.transunion.com">http://freeze.transunion.com</a>
800-525-6285	888-397-3742	800-680-7289

You may obtain information from your state's Attorney General Office about steps you can take to prevent identity theft.

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

**Kentucky Residents:** Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, [www.ag.ky.gov](http://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](http://www.oag.state.md.us/Consumer), Telephone: 1-888-743-0023.

**New Mexico Residents:** You have rights pursuant to the Fair Credit Reporting and Identity Security 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.

North Carolina Residents: Office of the Attorney General of North Carolina, 9001 Mail Service Center  
Raleigh, NC 27699-9001, [www.ncdoj.gov](http://www.ncdoj.gov), Telephone: 1-877-566-7226 or 1-919-716-6400.

Oregon Residents: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, [www.doj.state.or.us/](http://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](http://www.riag.ri.gov), Telephone: 401-274-4400.

All US Residents: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580.



Parent or guardian of <<Client First Name>> <<Client Last Name>>

<<Date>>

(Format: Month Day, Year)

<<Address1>>

<<Address2>>

<<City>>, <<State>> <<Zip Code>>

## Notice of Data Breach

Dear parent or guardian of <<First Name>> <<Last Name >>>,

We are writing to inform you of an incident that affected Redtail Technology that involved the personal information of <<First Name>> <<Last Name >>. You may not recognize Redtail Technology. Redtail Technology provides customer relationship management services for financial advisor groups; and in <<First Name>>'s case, <<FINANCIAL ADVISOR GROUP>> initially collected information about <<First Name>> that is stored in our system. We sincerely apologize and deeply regret that this incident has occurred.

### What Happened?

On March 4, 2019, we discovered that our logging systems inadvertently captured a small subset of personal information that we store for advisors and retained the data in a debug log file that was accessible to Internet users. We are working hard and increasing our efforts to help safeguard the personal data that is in our custody and protect it from future incidents.

### What Information Was Involved?

The debug file contained information such as first and last names, physical addresses, dates of birth, and Social Security numbers. You are receiving this letter because the personal information of <<First Name>> was contained in the debug file.

### What We Are Doing.

Redtail Technology values privacy and the trust you and the various advisors place in us. We regularly update and strengthen our systems and processes to help prevent unauthorized access in coordination with ongoing vulnerability and penetration testing. We will continue to exercise vigilance to help safeguard the data in our custody.

We have partnered with LifeLock, a Symantec company, to make available at no cost to you for one year its LifeLock Junior™ solution. As you may know, LifeLock is an industry leader in providing credit and identity theft monitoring and remediation services and products. Their incident response team has extensive experience in assisting people who have sustained an unintentional exposure of their personal information.

LifeLock Junior™ is specifically designed to protect minors' personal information as well as minors' financial standing and personal identity. In the unlikely event that <<First Name>> is impacted by this incident, LifeLock will take all steps necessary to respond to, remediate and rectify the situation.

**To activate the membership and get protection at no cost to you:**

1. Go to [www.LifeLock.com](http://www.LifeLock.com) and click on the red **START MEMBERSHIP** button.
2. You will be taken to another page where, below the three protection plan boxes, you can enter the promo code: **<<PROMO CODE>>** and click the APPLY button.
3. On the next page, enter the Member ID. (The Member ID is **<<MEMBER ID>>**).
4. Click the red **START YOUR MEMBERSHIP** button.
5. You will receive a confirmation email after enrollment (be sure to follow all directions in this email).

**You will have until August 15<sup>th</sup>, 2019 to enroll in this service.**

Once you have completed the LifeLock enrollment process, the service will be in effect. The LifeLock Junior™ Preferred membership includes:

- ✓ LifeLock Identity Alert® System†
- ✓ Live, US-Based Priority Member Support 24/7
- ✓ Stolen Funds Reimbursement up to \$25,000 \*
- ✓ Personal Expense Compensation up to \$25,000 \*
- ✓ Service Guarantee for Lawyers and Experts up to \$1 million \*
- ✓ Identity Restoration Support
- ✓ Credit File Detection
- ✓ Dark Web Monitoring
- ✓ Fictitious Identity Monitoring

† LifeLock does not monitor all transactions at all businesses.

\* Indicates features included within the Million Dollar Protection™ Package††† No one can prevent all identity theft.

**What You Can Do.**

We encourage you to take full advantage of this LifeLock offering and remain vigilant in protecting **<<First Name>>**'s personal information. We are also providing you with the attached Recommended Steps document that includes steps you may take on behalf of **<<First Name>>** to help protect **<<First Name>>**'s personal information.

**For More Information.**

We value the security and privacy of **<<First Name>>**'s information and we apologize for any inconvenience or concern caused by this incident. Our relationship with you, your confidence in our ability to safeguard the personal information in our custody, and your peace of mind are very important to us.

If you have any questions or need additional information about this notice, we have set up a dedicated support line through LifeLock, available 24/7/365. Please feel free to give us a call at **<<TOLL FREE NUMBER>>**.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. McLaughlin', with a stylized flourish at the end.

Brian McLaughlin, CEO

## Recommended Steps to Help Protect Your Information

It is recommended 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. You should report suspected identity theft to law enforcement, including your state's attorney general and the Federal Trade Commission. If you are a victim of identity theft, you may file a police report with your local law enforcement.

You can obtain information from the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft. The FTC can be reached at:

Federal Trade Commission  
Consumer Response Center  
600 Pennsylvania Ave, NW  
Washington, DC 20580  
1-877-IDTHEFT (438-4338)  
[www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)

**Free Credit Report:** You are entitled to one free copy of your credit report every 12 months from each of the three nationwide credit reporting companies. To obtain your free credit report visit [annualcreditreport.com](http://annualcreditreport.com) or call 1-877-322-8228. You will need to provide your name, address, social security number, and date of birth to verify your identity.

**Fraud Alerts:** You can place fraud alerts with the three major credit bureaus by phone and also via their websites. 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.

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

**Security Freeze:** You also have the right to place a security freeze on your credit report. 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 need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, or regular stamped mail, or by following the instructions found at the websites listed below. 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 must also include 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.

You may obtain a security freeze by contacting any one or more of the following national consumer reporting agencies:

<b>Equifax Security Freeze</b>	<b>Experian Security Freeze</b>	<b>TransUnion (FVAD)</b>
P.O. Box 105788	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19022
<a href="http://www.freeze.equifax.com">www.freeze.equifax.com</a>	<a href="http://www.experian.com/freeze">www.experian.com/freeze</a>	<a href="http://freeze.transunion.com">http://freeze.transunion.com</a>
800-525-6285	888-397-3742	800-680-7289

You may obtain information from your state's Attorney General Office about steps you can take to prevent identity theft.

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

**Kentucky Residents:** Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, [www.ag.ky.gov](http://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](http://www.oag.state.md.us/Consumer), Telephone: 1-888-743-0023.

**New Mexico Residents:** You have rights pursuant to the Fair Credit Reporting and Identity Security 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.

North Carolina Residents: Office of the Attorney General of North Carolina, 9001 Mail Service Center  
Raleigh, NC 27699-9001, [www.ncdoj.gov](http://www.ncdoj.gov), Telephone: 1-877-566-7226 or 1-919-716-6400.

Oregon Residents: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, [www.doj.state.or.us/](http://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](http://www.riag.ri.gov), Telephone: 401-274-4400.

All US Residents: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580.