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February 19, 2019

Attorney General Gordon MacDonald
Office of the New Hampshire Attorney General
33 Capitol Street
Concord, NH 03301

Re: The Richards Group – Incident Notification

Dear Attorney General MacDonald:

McDonald Hopkins PLC represents The Richards Group. I am writing to provide notification of an incident at The Richards Group that may affect the security of personal information of approximately twenty-two (22) New Hampshire residents. The Richards Group's investigation is ongoing and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, The Richards Group does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

The Richards Group recently learned that one of its employees was the victim of an email phishing attack resulting in unauthorized access to the employee's email box from April 17, 2018 to October 1, 2018. Upon learning of the issue, The Richards Group commenced a prompt and thorough investigation. As part of its investigation, The Richards Group has been working very closely with external data privacy and cybersecurity professionals experienced in handling these types of incidents. After an extensive forensic investigation and manual email review, The Richards Group discovered on January 3, 2019 that the impacted email account that was accessed contained some of the affected residents' personal information. The information included the affected residents' full names and one or more of the following: Social Security numbers, driver's license numbers or state identification numbers, and/or bank account information. Not all of the affected residents' had their Social Security numbers impacted by this incident.

To date, The Richards Group is not aware of any instances of identity fraud as a direct result of this incident. Nevertheless, out of an abundance of caution, The Richards Group wanted to make you (and the affected residents) aware of the incident and explain the steps that it is taking to help safeguard the affected residents against identity fraud. The Richards Group has provided the affected residents with written notice of this incident commencing on February 15, 2019, in substantially the same form as the letter attached hereto. The Richards Group offered the affected residents whose Social Security numbers were impacted a complimentary

one-year membership with a credit monitoring service. The affected residents whose bank account information was impacted were advised to contact their financial institutions to inquire about steps to take to protect their accounts. The Richards Group advised the affected residents about the process for placing a fraud alert and/or security freeze on their credit files and obtaining free credit reports. The affected residents were provided with the contact information for the consumer reporting agencies and the Federal Trade Commission.

At The Richards Group, safeguarding personal information is a top priority. The Richards Group is committed to maintaining the privacy of personal information in its possession and has taken many precautions to safeguard it. The Richards Group continually evaluates and modifies its practices and internal controls to enhance the security and privacy of personal information.

Should you have any questions regarding this notification, please contact me at (248) 220-1354 or jgiszczak@mcdonaldhopkins.com. Thank you for your cooperation.

Sincerely,

James J. Giszczak

Encl.

The Richards Group

48 Harris Place
Brattleboro, VT 05302

IMPORTANT INFORMATION
PLEASE REVIEW CAREFULLY

[redacted]

[redacted]

Dear [redacted]

I am writing with important information regarding a recent security incident. The privacy and security of the personal information we maintain is of the utmost importance to The Richards Group ("Richards Group"). As such, we wanted to provide you with information about the incident, explain the services we are making available to you, and let you know that we continue to take significant measures to protect your information.

What Happened?

We recently learned that a Richards Group employee was the victim of an email phishing attack resulting in unauthorized access to the employee's email box from April 17, 2018 to October 1, 2018.

What We Are Doing.

Upon learning of the issue, we commenced a prompt and thorough investigation. As part of our investigation, we have been working very closely with external data privacy and cybersecurity professionals experienced in handling these types of incidents. After an extensive forensic investigation and manual email review, we discovered on January 3, 2019 that the impacted email account that was accessed contained some of your personal information. To date, we are not aware of any instances of identity fraud as a direct result of this incident. Nevertheless, out of an abundance caution, we want to make you aware of the incident.

What Information Was Involved?

The impacted email account that was accessed contained some of your personal information, including your full name and Social Security number, and may have also contained your driver's license number or state identification number.

What You Can Do.

To protect you from potential misuse of your information, we are offering a complimentary one-year membership of Experian IdentityWorks℠ Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.

This letter also provides other precautionary measures you can take to protect your personal information, including placing a fraud alert and/or security freeze on your credit files, and/or obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis.

For More Information.

Please accept our apologies that this incident occurred. We are committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices and internal controls to enhance the security and privacy of your personal information.

If you have any further questions regarding this incident, please call [redacted] at [redacted]. [redacted] available Monday through Friday, [redacted].

Sincerely,

[redacted]

– OTHER IMPORTANT INFORMATION –

1. Enrolling in Complimentary 12-Month Credit Monitoring.

To help protect your identity, we are offering a **complimentary** one-year membership of Experian IdentityWorks[SM] Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: [redacted] (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: [redacted]
3. PROVIDE the **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 [redacted]. Be prepared to provide engagement number [redacted] as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **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.
- **Experian IdentityWorks ExtendCARE[TM]:** 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.

Activate your membership today at [redacted]
or call [redacted] to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to [redacted] for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at [redacted].

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

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). 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.

2. Placing a Fraud Alert on Your Credit File.

Whether or not you choose to use the complimentary 12 month credit monitoring services, we recommend that you place an initial 90-day "fraud alert" on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

Equifax
P.O. Box 105069
Atlanta, GA 30348
www.equifax.com
1-800-525-6285

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

TransUnion LLC
P.O. Box 2000
Chester, PA 19016
www.transunion.com
1-800-680-7289

3. Consider Placing a Security Freeze on Your Credit File.

If you are very concerned about becoming a victim of fraud or identity theft, you may request a "security freeze" be placed on your credit file, at no charge. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by contacting all three nationwide credit reporting companies at the numbers below and following the stated directions or by sending a request in writing, by mail, to all three credit reporting companies:

Equifax Security Freeze
PO Box 105788
Atlanta, GA 30348
https://www.freeze.equifax.com
1-800-349-9960

Experian Security Freeze
PO Box 9554
Allen, TX 75013
http://experian.com/freeze
1-888-397-3742

TransUnion Security Freeze
P.O. Box 2000
Chester, PA 19016
http://www.transunion.com/securityfreeze
1-888-909-8872

In order to place the security freeze, you'll need to supply your name, address, date of birth, Social Security number and other personal information. 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 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.

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. After you sign up for the credit monitoring service, you may refreeze your credit file.

4. Obtaining a Free Credit Report.

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at **www.annualcreditreport.com**. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

5. Additional Helpful Resources.

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, call your local law enforcement agency and file a police report. 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 by contacting them on the web at www.ftc.gov/idtheft, by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.