

# Robinson+Cole

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RECEIVED

DEC 11 2017

Also admitted in Massachusetts

CONSUMER PROTECTION

Sent via first-class mail

December 8, 2017

Attorney General Gordon J. MacDonald  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

## **RE: Breach Notification**

Dear Attorney General MacDonald:

Please be advised that we represent Shamrock Financial Corporation ("Shamrock"). Pursuant to RSA § 359-C:20, we are reporting to you that Shamrock notified six New Hampshire residents of a potential data breach that may have resulted in the unauthorized access of their personal information.

At some point prior to August 2, 2017, as a result of a sophisticated social engineering intrusion, a third party gained access to Shamrock's systems in an attempt to redirect wiring instructions. The intruder's access to Shamrock's systems ceased on August 11, 2017. Based on the circumstances of the intrusion, there is a possibility that the third party had access to customer loan applications, which include name, address, date of birth, Social Security number and financial information. At this time, Shamrock does not have any direct evidence that any personal information of New Hampshire residents was actually accessed or that any information was exfiltrated as a result of the intrusion, but is providing notice to individuals and to your office out of an abundance of caution.

The New Hampshire residents affected by this incident have received the enclosed notice pursuant to RSA § 359-C:20. We are offering the affected individuals credit monitoring at no charge for a period of 12 months.

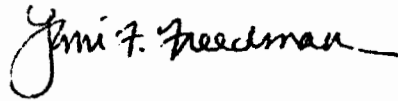
Attorney General Gordon J. MacDonald

12/8/2017

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If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Linn F. Freedman". The signature is written in a cursive style with a long horizontal stroke at the end.

Linn F. Freedman

cc: Commissioner Gerald H. Little  
New Hampshire Banking Department  
53 Regional Drive, Suite 200  
Concord, NH 03301



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**RE: Your personal information**

Dear <<Name 1>>:

Shamrock Financial Corporation (Shamrock) is committed to protecting the privacy and personal information of our customers. We are writing to inform you of a sophisticated social engineering intrusion that began at some time prior to August 2, 2017 and terminated on August 11, 2017. Based on the circumstances of the intrusion, Shamrock believes the third party may have had access to certain customer loan applications, which include name, address, date of birth, Social Security number, and financial information. However, at this time, Shamrock does not have any direct evidence that any of your personal information was actually accessed or that any information was exfiltrated as a result of the intrusion. Upon discovery of this incident, Shamrock immediately took action to contain the intrusion and is working with forensic and other consultants concerning the incident.

While the investigation is still ongoing, at this point, we have no evidence that any of your personal information has been misused. However, based on the circumstances of the intrusion, and out of an abundance of caution, we are taking appropriate precautionary measures to ensure your financial security and help alleviate any concerns you may have.

In order to protect your information, Shamrock is offering you access to free credit monitoring for twelve (12) months through CyberScout. To enroll in this service, visit the website indicated below and enter the enrollment code indicated below.

Website: <https://www.myidmanager.com/> -----

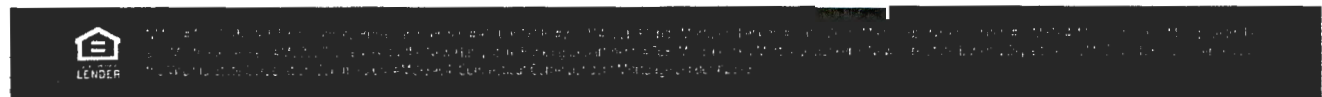
Enrollment Code: <<Enrollment Code>>

Shamrock's credit monitoring offering is similar but not identical to credit monitoring you may have already enrolled in through Equifax as a result of the recent data breach involving Equifax. Shamrock's offering through CyberScout relies on credit information from Experian, not Equifax, however.

If you choose not to use these services, **we strongly urge you to do the following:**

To place a fraud alert or security freeze on your own, you will need to contact one of the three major credit agencies directly at:

**Equifax**  
**1-800-525-6285**  
**P.O. Box 105788**  
**Atlanta, GA 30348**  
**www.equifax.com**



**Experian**  
1-888-397-3742  
P.O. Box 9554  
Allen, TX 75013  
www.experian.com

**Trans Union**  
1-800-680-7289  
Fraud Victim Assistance Department  
P.O. Box 2000  
Chester, PA 19022-2000  
www.transunion.com

A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services.

Please note that if you have been a victim of identity theft, and you provide the credit reporting agency with a valid police report, it cannot charge you to place, lift or remove a security freeze. In all other cases, a credit reporting agency may charge you up to \$5.00 each to place, temporarily lift, or permanently remove a security freeze.

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security Number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
5. Proof of current address such as a current utility bill or telephone bill;
6. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft;
8. If you are not a victim of identity theft, include payment by check, money order, or credit card (Visa, MasterCard, American Express or Discover only). Do not send cash through the mail.

The credit reporting agencies have three (3) business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with a unique personal identification number (PIN) or password, or both that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, you must call or send a written request to the credit reporting agencies by mail and include proper identification (name, address, and social security number) and the PIN number or password provided to you when you placed the security freeze as well as the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have three (3) business days after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must send a written request to each of the three credit bureaus by mail and include proper identification (name, address, and social security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have three (3) business days after receiving your request to remove the security freeze.

Should you wish to obtain a credit report and monitor it on your own, you may obtain free copies of your credit report by visiting [www.annualcreditreport.com](http://www.annualcreditreport.com) or by calling them toll-free at 1-877-322-8228. (Hearing impaired consumers can access their TDD service at 1-877-730-4204.) Upon receipt of your credit report, we recommend that you review it carefully for any suspicious activity.

Please note that you also have the right to obtain a police report filed in regard to this incident. Due to the circumstances of this incident, no police report was filed. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

You can also obtain more information about identity theft and ways to protect yourself from the Federal Trade Commission (FTC), 600 Pennsylvania Avenue, NW, Washington, DC 20580. The FTC has an identity theft hotline: 877-438-4338; TTY: 1-866-653-4261. They also provide information online at [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft).

If you are a Rhode Island resident, you may also wish to contact the Rhode Island Attorney General's Office, Consumer Protection Unit, 150 South Main Street, Providence, Rhode Island 02903, at [consumers@riag.ri.gov](mailto:consumers@riag.ri.gov) or (401) 274-4400. You may also visit their website for more information <http://www.riag.ri.gov/ConsumerProtection/About.php>.

If you have not yet filed your taxes this year, or if you are concerned about tax identity theft, we recommend that you visit the IRS Taxpayer Guide to Identity Theft at <http://www.irs.gov> for more information. If you have not filed your taxes this year, you should consider notifying the IRS that your tax records may be at risk by completing IRS Form 14039 (Identity Theft Affidavit) which can be located at <http://www.irs.gov/pub/irs-pdf/f14039.pdf>. You will need to send Form 14039 to the IRS along with a copy of your valid government-issued identification, such as a Social Security card, driver's license, or passport to the address on the form or by faxing it to 1-855-807-5720.

Detailed below are a few things to keep in mind when filing Internal Revenue Service Form 14039:

- All documents, including your identification, must be clear and legible;
- The identity theft marker will remain on your file for a minimum of three tax cycles;
- Any returns containing your social security number will be reviewed by the IRS for possible fraud; and
- The marker may delay the processing of any legitimate tax returns.

We regret any inconvenience this may cause you. If you have any questions, please call the following number any time Monday through Friday from 9am to 9pm Eastern: 888-396-9593

Sincerely,



Rod Correia  
President