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DEPT OF JUSTICE
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March 22, 2021

VIA OVERNIGHT MAIL

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

Re: *Incident Notification*

Dear Attorney General MacDonald:

We are writing on behalf of our client, Solairus Aviation (“Solairus”), to notify you of a security incident.

On December 23, 2020, Solairus was notified by a third-party vendor, Avianis, of unauthorized access to Avianis’s Microsoft Azure cloud hosting platform that is used to host their flight scheduling and tracking system. Solairus immediately began working with Avianis, their in-house technical team, and their outside legal counsel to determine what happened, the scope of data that was potentially accessed, and what steps can be taken to further safeguard Avianis’s systems and better protect Solairus’s data. The investigation determined that an unauthorized third-party accessed some of the data in Avianis’s cloud storage environment. Solairus reviewed the data and, on February 5, 2021, identified five New Hampshire residents’ names, passport numbers, and credit or debit card numbers in the impacted data.

Beginning on March 16, 2021, Solairus began mailing notification letters via United States Postal Service First Class Mail to the five residents in accordance with N.H. Rev. Stat. Ann. § 359-C:20.¹ A copy of the notification letter is enclosed. Solairus will also be providing substitute notice via a posting on the Solairus website and via press release. Solairus also provided a telephone number for potentially affected individuals to call with any questions they may have about the incident. To help prevent something like this from happening in the future, Avianis has taken steps

¹ This report does not waive Solairus’s objection that New Hampshire lacks personal jurisdiction over it related to any claims that may arise from this incident.

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to enhance their existing security program including implementing multiple layers of protective measures, ensuring that they follow best practices in the security of data storage, and are re-educating staff in proper handling of sensitive data.

Sincerely,

A handwritten signature in black ink that reads "M. Scott Koller". The signature is written in a cursive style with a large, prominent "M" and "K".

M. Scott Koller

Partner

Enclosure(s)



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

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country >>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

Solairus recognizes the importance of protecting the information we maintain. We are writing to inform you of an incident that may have involved some of your information. This letter summarizes the incident, measures we have taken, and steps you can take in response.

What Happened?

On December 23, 2020, we were notified by a third-party vendor of an unauthorized intrusion into the vendor's Microsoft Azure cloud hosting platform that is used to host our flight scheduling and tracking system. We immediately began working with the vendor, our in-house technical team, and our outside legal counsel to determine what happened, the scope of data that was potentially accessed, and what steps can be taken to further safeguard the vendor's systems and better protect our data. The investigation determined that an unauthorized third party accessed some of our data in the vendor's cloud storage.

What Information Was Involved?

We completed a review of the files in the impacted cloud storage and determined that a document contained your <<b2b_text_1(DataElements)>>.

What We Are Doing.

Upon being notified of the unauthorized access, we worked with our vendor to ensure that they made changes to their system to prevent the unauthorized party from further accessing their systems. To help prevent something like this from happening in the future, our vendor has taken steps to enhance their existing security program including implementing multiple layers of protective measures, ensuring that they follow best practices in the security of data storage, and are re-educating staff in proper handling of sensitive data.

What You Can Do.

While we have no indication that your information has been misused, we wanted to notify you of this incident and remind you that it is always advisable to remain vigilant for signs of unauthorized activity by reviewing your financial account statements. If you see charges or activity you did not authorize, we suggest that you contact the provider immediately. For more information on some additional steps you can take in response, please see the additional information provided in the following pages.

For More Information.

If you have any questions, please call 1-855-515-1652, Monday through Friday, from 8:00 a.m. to 5:30 p.m. Central Time.

We regret the inconvenience or concern this incident may cause you. Every member of the Solairus community is important to us, and we want to assure you that we value your security and privacy. We know you place your trust in us, and we will never take that trust for granted.

Sincerely,

Dan Drohan
Chief Executive Officer
Solairus Aviation

John King
President
Solairus Aviation

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

Fraud Alerts and Credit or Security Freezes:

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, www.transunion.com
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com

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 bureau will provide you with 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.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

Additional information for residents of the following states:

Solairus Aviation is located at 201 1st Street #307, Petaluma, CA 94952 and can be contacted at (707) 775-2760.

Connecticut: You may contact and obtain information from your state attorney general at: *Connecticut Attorney General's Office*, 165 Capitol Ave, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag

District of Columbia: You may contact and obtain information from your attorney general at: *Office of the Attorney General for the District of Columbia*, 441 4th Street NW, Washington, DC 20001, 1-202-727-3400, www.oag.dc.gov

Maryland: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us

New York: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

North Carolina: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov

Summary of Your Rights Under the Fair Credit Reporting Act: The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street NW, Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- 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 reports to be provided to employers.
- You may limit "prescreened" offers of credit and insurance you get based on information in your credit report.
- You have a right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.