

STATE OF NH  
DEPT OF JUSTICE

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**Akin Gump**

STRAUSS HAUER & FELD LLP

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October 20, 2016

Attorney General Joseph Foster  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

Dear Attorney General Foster:

Akin Gump Strauss Hauer & Feld, LLP represents SOS International ("SOSi"). I write to provide notification concerning an incident in which the personal information of one (1) New Hampshire resident, who is an independent contractor of SOSi, was viewed or downloaded by an unauthorized person.

SOSi entered into a series of contracts with interpreters to provide services in support of a prime contract held by SOSi. Beginning in mid-August 2016, SOSi began using the Egnyte™ file-sharing platform to facilitate renewing and extending these contracts. On September 20, 2016, SOSi discovered that, on or after September 13, 2016, some SOSi independent contractors were accidentally provided a link that could be used to access and download contract extension paperwork that had been submitted by other SOSi independent contractors who also provided interpreter services in support of the same prime contract.

SOSi immediately began an investigation. SOSi's investigation revealed that some contract interpreters had in fact accessed or downloaded contract extension paperwork that had been submitted by other contract interpreters and which contained personal information. Specifically, SOSi's investigation revealed that personal information of one (1) New Hampshire resident was viewed or downloaded by an unauthorized person during this incident. Personal information of this individual New Hampshire resident that was compromised during this incident included name, mailing address, phone number, email address, and Social Security number.

SOSi acted quickly to remediate this incident. On the same day that SOSi discovered this incident, SOSi removed the relevant Egnyte™ folder and all of its contents (including the personal information of the New Hampshire resident) from the platform. SOSi has also taken steps to enhance the security on all Egnyte™ folders containing sensitive information, as well as

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to reduce the likelihood of similar incidents in the future. Additionally, SOSi is providing one year of identity monitoring for this individual New Hampshire resident.

SOSi provided the New Hampshire resident with written notice of this incident commencing on October 18, 2016. Please find a copy of the notice provided to the New Hampshire resident attached to this letter.

Should you have any additional questions, please contact me at 202-887-4220 or [jsklein@akingump.com](mailto:jsklein@akingump.com).

Sincerely,



Jo-Ellyn Sakowitz Klein

Enclosure



<<MemberFirstName>> <<MemberLastName>> <<Date>> (Format: Month Day, Year)  
<<Address1>>  
<<Address2>>  
<<City>>, <<State>> <<Zip Code>>

### **Notice of Data Breach**

Dear <<MemberFirstName>> <<MemberLastName>>,

We are writing to tell you about a data incident involving personal information that was included in contract extension paperwork that you submitted to SOSi. We take the protection and proper use of your information very seriously. For this reason, we are contacting you directly to explain the circumstances of the incident.

#### **What happened?**

As you know, SOSi entered into a series of contracts with interpreters to provide services in support of a prime contract held by SOSi. Beginning in mid-August 2016, SOSi began using the Egnyte™ file-sharing platform to facilitate renewing and extending these contracts. In September 2016, SOSi experienced a data incident involving the Egnyte™ file-sharing platform, in which personal information contained in contract materials uploaded to an Egnyte™ folder by some SOSi independent contractors may have been accessed or downloaded from Egnyte™ by other SOSi independent contractors.

Specifically, on or after September 13, 2016, some SOSi independent contractors were accidentally provided a link that could be used to access and download contract extension paperwork that had been submitted by other SOSi independent contractors who also provided interpreter services in support of the same prime contract. SOSi's investigation revealed that some contract interpreters had in fact accessed or downloaded contract extension paperwork that had been submitted by some other contract interpreters. Unfortunately, our investigation has indicated that your contract extension paperwork may have been accessed or downloaded by other SOSi contract interpreters during this incident.

#### **What information was involved?**

This incident involved the contract extension paperwork that you submitted to SOSi in September 2016. Any personal information contained in the contract extension paperwork you completed and uploaded at that time, using a link provided by SOSi, was exposed in this data incident. These documents included your full name, your street address, your phone number, <<ClientDef1(Breach Details Variable Text)>> and your email address.

#### **What we are doing.**

SOSi discovered this problem on September 20, 2016, and that same day SOSi removed the relevant Egnyte™ folder and all of its contents (including your contract extension paperwork) from the platform. SOSi has also taken steps to enhance the security on all Egnyte™ folders containing sensitive information, as well as to reduce the likelihood of similar incidents in the future.

Additionally, to help relieve concerns and restore confidence following this incident, SOSi has secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Identity monitoring services for which you are eligible to enroll include Credit Monitoring, a Current Credit Report, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Theft Insurance, Identity Consultation, and Identity Restoration.

Visit [krollbreach.idMonitoringService.com](http://krollbreach.idMonitoringService.com) to enroll and take advantage of your identity monitoring services.

Membership Number: <<Member ID>>

To receive credit services by mail instead of online, please call 1-844-263-8605. Additional information describing these services is included with this letter.

**What you can do:**


Please review the enclosed "Additional Resources" section included with this letter. This section describes additional steps you can take to help protect yourself, 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.

**For more information.**

If you have questions, please call 1-866-775-4209, Monday through Friday from 8:00 a.m. to 5:00 p.m. Central Time. Please have your membership number ready.

Protecting your information is important to us. We trust that the services we are offering to you demonstrate our continued commitment to the security of your information.

Sincerely,



Stephen Iwicki  
Vice President, Intelligence Solutions Group

## ADDITIONAL RESOURCES

### Contact information for the three nationwide credit reporting agencies is:

**Equifax**, PO Box 740241, Atlanta, GA 30374, [www.equifax.com](http://www.equifax.com), 1-800-685-1111

**Experian**, PO Box 2104, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742

**TransUnion**, PO Box 2000, Chester, PA 19022, [www.transunion.com](http://www.transunion.com), 1-800-888-4213

**Free Credit Report.** It is recommended that you remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring your credit report for 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 agencies.

To order your annual free credit report please visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at **1-877-322-8228**.

You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's ("FTC") website at [www.consumer.ftc.gov](http://www.consumer.ftc.gov)) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

### **For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents:**

You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

**Fraud Alert.** You may place a fraud alert in your file by calling one of the three nationwide credit reporting agencies above. 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.

**Security Freeze.** You have the ability 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 may be able to use an online process, an automated telephone line, or a written request to any of the three credit reporting agencies listed above. 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. The credit reporting agencies may charge a fee to place a freeze, temporarily lift it or permanently remove it. The fee is waived if you are a victim of identity theft and have submitted a valid investigative or law enforcement report or complaint relating to the identity theft incident to the credit reporting agencies. (You must review your state's requirement(s) and/or credit bureau requirement(s) for the specific document(s) to be submitted.)

**For Massachusetts residents:** The fee for each placement of a freeze, temporary lift of a freeze, or removal of a freeze is \$5.

**Federal Trade Commission and State Attorneys General Offices.** 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 home state. You may also contact these agencies for information on how to prevent or avoid identity theft.

You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, [www.ftc.gov/bcp/edu/microsites/idtheft/](http://www.ftc.gov/bcp/edu/microsites/idtheft/), 1-877-IDTHEFT (438-4338).

**For Maryland residents:** You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, [www.oag.state.md.us](http://www.oag.state.md.us), 1-888-743-0023.

**For North Carolina residents:** You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, [www.ncdoj.gov](http://www.ncdoj.gov), 1-877-566-7226.

### **Reporting of identity theft and obtaining a police report.**

**For Iowa residents:** You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

**For Massachusetts residents:** You have the right to obtain a police report if you are a victim of identity theft.

**For Oregon residents:** You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.



## TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services<sup>1</sup> from Kroll:

### **Triple Bureau Credit Monitoring and a TransUnion Credit Report.**

You'll receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll investigator, who can help you determine if it's an indicator of identity theft.

### **Web Watcher**

Web Watcher monitors internet sites where criminals buy, sell, and trade personal information. You'll be promptly notified if evidence of your identity information being traded or sold is discovered.

### **Public Persona**

Public Persona monitors public record databases for names, aliases, and addresses that are associated with your Social Security number. If information is found, an alert email is sent..

### **Quick Cash Scan**

Quick Cash Scan monitors thousands of short-term and cash-advance loan sources. You'll receive an alert when a loan is reported, and you can call a Kroll investigator for more information.

### **\$1 Million Identity Theft Insurance**

Reimburses you for out-of-pocket expenses totaling up to \$1 million in legal costs for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

### **Identity Consultation**

You have unlimited access to consultation with a dedicated licensed investigator at Kroll. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

### **Identity Restoration**

If you become a victim of identity theft, an experienced licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and will do most of the work for you. Your investigator can dig deep to uncover all aspects of the identity theft, and then work to resolve it.

<sup>1</sup> Kroll's activation website is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.