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July 12, 2013

VIA OVERNIGHT DELIVERY

Office of the New Hampshire Attorney General
Consumer Protection and Anti-Trust Bureau
33 Capitol Street
Concord, NH 03301

Attention: James Boffetti, Bureau Chief

Re: Incident Notification

Dear Mr. Boffetti:

St. Mary's Bank ("St. Mary's") is a state-chartered community based credit union regulated by the New Hampshire Banking Department.

On May 26, 2013, our client, St. Mary's, discovered malware on an employee workstation computer. An analysis by a nationally recognized computer security consulting firm found that the malware was designed to capture information as it appeared on individual computer screens and could have been introduced into 23 workstation computers beginning in February, 2013. As soon as the malware was discovered, St. Mary's brought in independent security experts to analyze its entire computer system and isolate and eliminate the malware using the most sophisticated computer security tools available.

Even though St. Mary's found no evidence that sensitive information, such as names, addresses, social security numbers, account information, or transaction records, was acquired by an unauthorized individual, out of an abundance of caution, St. Mary's is offering individuals who may have been affected one year of complimentary credit monitoring and identity theft protection services through Experian. St. Mary's is also providing call center support for those affected.

James Boffetti, Bureau Chief
July 12, 2013
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To help prevent something like this from happening in the future, St. Mary's continues to further enhance its information security measures.

St. Mary's conducted a thorough investigation of the incident and is notifying approximately 115,775 New Hampshire residents as soon as possible. *See* N.H. REV. STAT. § 359-C:20(I)(a). The mailing commenced on July 12, 2013. As a state-chartered credit union regulated by the New Hampshire Banking Department and a financial institution subject to the Gramm-Leach-Bliley Act, St. Mary's is required to maintain procedures for responding to a breach of security, and notification to New Hampshire residents is being provided in compliance with these procedures. *See* N.H. REV. STAT. §§ 359-C:20(V); *see also* 15 U.S.C. §§ 6801–6809. Moreover, St. Mary's has been working with the New Hampshire Banking Department during its investigation. *See* N.H. REV. STAT. § 394-B:3.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,



Theodore J. Kobus III

Enclosure

cc: Glenn A. Perlow
Bank Commissioner
State of New Hampshire Banking Department
53 Regional Drive
Concord, New Hampshire 03301

cc: Ronald H. Covey, Jr.
President, CEO
St. Mary's Bank
200 McGregor Street
Manchester, NH 03102



St. Mary's Bank

July 12, 2013

##92906-LV1-0123456 T-0012 *****5-DIGIT 1234

SAMPLE A SAMPLE



APT ABC

123 ANY ST

ANYTOWN, US 12345-6789



Dear Sample A Sample:

St. Mary's Bank values the trust you place in us, and we are committed to protecting the security and confidentiality of your personal information.

Regrettably, we are writing to inform you that on May 26, 2013, we discovered malicious software (known as "malware") on some of our individual employee workstation computers. An analysis by a nationally recognized computer security consulting firm found that the malware was designed to capture information as it appeared on individual computer screens and could have been introduced into some workstation computers beginning in February 2013. As soon as we discovered the malware, we brought in independent computer security experts to analyze our entire computer system and isolate and eliminate the malicious software using the most sophisticated computer security tools available.

We have found no evidence that sensitive information, such as names, addresses, social security numbers, account information, or transaction records, was acquired by any unauthorized individual. However, out of an abundance of caution, we are offering you a free one-year membership in ProtectMyID Alert™ from Experian®. This service will provide you with credit monitoring capabilities and in-depth assistance in identity theft protection. ProtectMyID Alert is completely free to you, and enrolling in this program will not hurt your credit score. Unfortunately, due to privacy laws, we are not able to enroll you directly. **For more information on identity theft prevention and ProtectMyID Alert, including instructions on how to activate your complimentary one-year membership, please see the additional information provided on the reverse of this letter.**

We have received no reports of unusual activity in any of our member accounts related to this malware, but we recommend that you carefully review your account statements for any sign of unauthorized activity and report it to us immediately. In addition, even though we have found no evidence that any information sufficient to access an online account was acquired, we recommend that you change your online banking passwords as an additional precaution.

We deeply regret the inconvenience this may cause you. To help prevent something like this from happening in the future, St. Mary's continues to further enhance its information security measures. If you have any questions, please call 1-877-216-3862 Monday through Friday between 9:00 a.m. and 7:00 p.m. Eastern Time. When prompted, please enter the following 10-digit reference code:

Sincerely,

Ronald H. Covey, Jr.
President, CEO

St. Mary's Bank ♦ The Nation's First Credit Union

200 McGregor St., Manchester, NH 03102

www.stmarysbank.com

92906-LV1

ProtectMyID Alert Enrollment Information

1. **You Must Enroll By: October 31, 2013**
2. **ProtectMyID Web Site:** <http://www.protectmyid.com/redeem> or call 1-877-371-7902 to enroll
3. **Your Activation Code:**

Once your ProtectMyID Alert membership is activated, your credit report will be monitored daily for 50 leading indicators of identity theft. You'll receive timely Credit Alerts from ProtectMyID Alert on any key changes in your credit report which could include new inquiries, new credit accounts, medical collections and changes to public records.

ProtectMyID Alert provides you with powerful identity protection that will help detect, protect and resolve potential identity theft. In the case that identity theft is detected, ProtectMyID Alert will assign a dedicated U.S.-based Identity Theft Resolution Agent who will walk you through the process of fraud resolution from start to finish for seamless service.

Your complimentary One-Year ProtectMyID Alert membership includes:

- **Credit Report:** A free copy of your Experian credit report
- **Daily Credit Monitoring:** Alerts you of suspicious activity including new inquiries, newly opened accounts, delinquencies, or medical collections.
- **Identity Theft Resolution:** If you have been a victim of identity theft, you will be assigned a dedicated, U.S.-based Experian Identity Theft Resolution Agent who will walk you through the fraud resolution process, from start to finish.
- **\$1 Million Identity Theft Insurance*:** As a ProtectMyID Alert member, you are immediately covered by a \$1 million insurance policy that can help you cover certain costs including, lost wages, private investigator fees, and unauthorized electronic fund transfers.

Once your enrollment in ProtectMyID Alert is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID Alert, 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 1-877-371-7902.

Even if you choose not to enroll in this program, we recommend you remain vigilant to the possibility of fraud and identity theft over the next 12 to 24 months by reviewing your credit report and credit card, bank, and other financial statements for any unauthorized activity. You may also obtain a copy of your credit report, free of charge, directly from each of the three nationwide credit reporting companies. To order your credit report, free of charge once every 12 months, from each of the three major nationwide credit companies, 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	Experian	TransUnion
PO Box 740256	PO Box 9554	PO Box 6790
Atlanta, GA 30374	Allen, TX 75013	Fullerton, CA 92834
www.equifax.com	www.experian.com	www.transunion.com
1-800-525-6285	1-888-397-3742	1-800-680-7289

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. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
www.ftc.gov/idtheft
1-877-438-4338

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.

* Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of Chartis, Inc. 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.