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MAR 15 2019

CONSUMER PROTECTION

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March 11, 2019

***INTENDED FOR ADDRESSEE(S) ONLY  
VIA U.S. 1<sup>st</sup> CLASS MAIL***

Attorney General Gordon J. MacDonald  
Office of the New Hampshire Attorney General  
Attn: Security Breach Notification  
33 Capitol Street  
Concord, NH 03301

**Re: Notice of Data Event**

Dear Attorney General MacDonald:

We represent Stair Galleries & Restoration Inc. ("Stair Galleries") located at 549 Warren Street, Hudson, NY 12534-2801. And are writing to notify your office of an incident that may affect the security of some personal information relating to five (5) New Hampshire residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Stair Galleries does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

**Nature of the Data Event**

On or about October 23, 2018, Stair Galleries became aware of suspicious activity relating to one of its employee email accounts, including rules set up in the email account to delete certain email messages that were not set up by the valid user. Stair Galleries immediately changed the email account password, reported the incident to local law enforcement, and began working with an outside computer forensics investigator to determine the nature and scope of the issue. On November 5, 2018, Stair Galleries' investigation determined the employee email account was subject to intermittent unauthorized login activity by an unknown actor(s) between June 5, 2018 and October 23, 2018.

Based upon that finding, a thorough review of the data contents of the email account was performed to identify individuals whose protected personal information was stored therein at the time of the unauthorized access. Because the review identified many individuals whose address was not present within the email account data contents, Stair Galleries then undertook a lengthy search of its internal

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records to locate the missing addresses so that notice could be provided to all affected individuals. While the type of protected personal information may vary by individual, the types of information impacted for New Hampshire residents includes the following: name, Social Security Number, credit card number and financial account information.

### **Notice to New Hampshire Residents**

On or about March 11, 2019 Stair Galleries began providing written notice of this incident to affected individuals, including five (5) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

### **Other Steps Taken and To Be Taken**

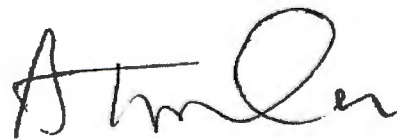
Upon discovering the event, Stair Galleries moved quickly to investigate and respond to the incident, assess the security of Stair Galleries systems, and notify potentially affected individuals. Stair Galleries is also working to implement additional safeguards and training to its employees. Stair Galleries is providing access to credit monitoring services for two (2) years, through TransUnion to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Stair Galleries is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Stair Galleries is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. Stair Galleries is notifying other state regulators where required.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4801.

Very truly yours,



Alexander T. Walker of  
MULLEN COUGHLIN LLC

ATW:ncl  
Enclosure

# **EXHIBIT A**

# STAIR

549 Warren St.  
Hudson, NY 12534

3/11/19

[FIRST NAME] [LAST NAME]  
[STREET ADDRESS 1]  
[STREET ADDRESS 2]  
[CITY], [STATE] [ZIPE CODE]

## RE: Notice of Data Breach

Dear [FIRST NAME] [LAST NAME],

Stair Galleries & Restoration Inc. (“Stair”) is writing to notify you of a recent data security incident that may impact the security of your personal information. Stair writes to advise you of our investigation and the steps we have taken in response to this incident as well as steps you can take to protect your personal information should you feel it is appropriate to do so.

**What Happened?** Beginning on October 23, 2018, Stair became aware of suspicious activity relating to one of its employee email accounts, including rules set up in the email account to delete certain email messages that were not set up by the valid user. We immediately changed the email account password, reported the incident to local law enforcement, and began working with an outside computer forensics investigator to determine the nature and scope of the issue. On November 5, 2018, our investigation determined the employee email account was subject to intermittent unauthorized login activity by an unknown actor(s) between June 5, 2018 and October 23, 2018.

**What Information Was Involved?** Because the investigation was unable to rule out that email messages or email file attachments stored in the email account were subject to unauthorized viewing or download by the unknown actor(s), we conducted a thorough review of the contents of the email account to identify sensitive personal information it contained. Our review to identify all impacted individuals was recently completed. We determined the following types of your personal information were stored within the impacted email account and could have been subject to unauthorized access: [DATA ELEMENTS].

**What We Have Done.** We take the security of personal information in our care very seriously. Since discovering this issue, we changed the password of the affected email account and implemented multifactor authentication as part of the login process for all employee email accounts.

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online, three-bureau credit monitoring service (*my*TrueIdentity) for two years provided by TransUnion Interactive, a subsidiary of TransUnion, one of the three nationwide credit reporting companies.

### **How to Enroll: You can sign up online or via U.S. mail delivery**

- To enroll in this service, go to the *my*TrueIdentity website at **www.MyTrueIdentity.com** and, in the space referenced as “Enter Activation Code,” enter the 12-letter Activation Code [ACTIVATION CODE] and follow the three steps to

receive your credit monitoring service online within minutes.

- If you do not have access to the Internet and wish to enroll in a similar offline, paper-based, three-bureau credit monitoring service, via U.S. mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the six-digit telephone passcode **697573** and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and **June 30, 2019**. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

**ADDITIONAL DETAILS REGARDING YOUR 24-MONTH COMPLIMENTARY CREDIT MONITORING SERVICE:**

- Once you are enrolled, you will be able to obtain two years of unlimited access to your TransUnion credit report and credit score.
- The daily three-bureau credit monitoring service will notify you if there are any critical changes to your credit files at TransUnion,<sup>®</sup> Experian,<sup>®</sup> and Equifax,<sup>®</sup> including fraud alerts, new inquiries, new accounts, new public records, late payments, changes of address, and more.
- The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

***What You Can Do.*** You can take advantage of our offer of credit monitoring and identity restoration services. You can also review the enclosed *Steps You Can Take to Protect Against Identity Theft and Fraud*.

***For More Information.*** We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, or need assistance please call Paige Wentworth at 518-751-1000.

We sincerely apologize for this incident and regret any concern or inconvenience this has caused you.

Sincerely,

Colin Stair  
President  
Stair Galleries & Restoration Inc.

## Steps You Can Take to Protect Against Identity Theft and Fraud

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the 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. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

<b>Experian</b> PO Box 9554 Allen, TX 75013 1-888-397-3742 <a href="http://www.experian.com/freeze/center.html">www.experian.com/freeze/center.html</a>	<b>TransUnion</b> P.O. Box 2000 Chester, PA 19016 1-888-909-8872 <a href="http://www.transunion.com/credit-freeze">www.transunion.com/credit-freeze</a>	<b>Equifax</b> PO Box 105788 Atlanta, GA 30348-5788 1-800-685-1111 <a href="http://www.equifax.com/personal/credit-report-services">www.equifax.com/personal/credit-report-services</a>
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As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

<b>Experian</b> P.O. Box 2002 Allen, TX 75013 1-888-397-3742 <a href="http://www.experian.com/fraud/center.html">www.experian.com/fraud/center.html</a>	<b>TransUnion</b> P.O. Box 2000 Chester, PA 19106 1-800-680-7289 <a href="http://www.transunion.com/fraud-victim-resource/place-fraud-alert">www.transunion.com/fraud-victim-resource/place-fraud-alert</a>	<b>Equifax</b> P.O. Box 105069 Atlanta, GA 30348 1-888-766-0008 <a href="http://www.equifax.com/personal/credit-report-services">www.equifax.com/personal/credit-report-services</a>
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Although we have no reason to believe that your personal information has been used to file fraudulent tax returns, you can contact the IRS at [www.irs.gov/Individuals/Identity-Protection](http://www.irs.gov/Individuals/Identity-Protection) for helpful information and guidance on steps you can take to address a fraudulent tax return filed in your name

and what to do if you become the victim of such fraud. You can also visit [www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft](http://www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft) for more information.

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, [www.identitytheft.gov](http://www.identitytheft.gov), 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement. This notice has not been delayed by law enforcement.

**For Maryland residents**, the Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and [www.oag.state.md.us](http://www.oag.state.md.us). **For North Carolina residents**, the Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at [www.ncdoj.gov](http://www.ncdoj.gov). **For Rhode Island residents**, the Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at [www.riag.ri.gov](http://www.riag.ri.gov). A total of 4 Rhode Island residents may be impacted by this incident.