

# BakerHostetler

## Baker & Hostetler LLP

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January 26, 2022

### VIA E-MAIL (DOJ-CPB@DOJ.NH.GOV)

Attorney General John Formella  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

*Re: Incident Notification*

Dear Attorney General Formella:

This is a supplemental notice for Star Group, L.P. (“Star”) related to an incident for which Star first notified nine New Hampshire residents and this office on October 22, 2021. Since that time, Star completed its investigation and identified an additional 69 New Hampshire residents to be notified. In total, 78 New Hampshire residents will be notified. This incident relates to the Star self-insured health plan (the “Plan”) that provides certain benefits to eligible employees. The Plan is a “covered entity,” as that term is defined under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”).

Star identified a data security incident that resulted in the encryption of certain systems within the Star environment. Star immediately took actions to address the incident and restore operations, contacted law enforcement, and began an investigation with the assistance of an outside cybersecurity firm. The investigation determined that an unauthorized person obtained access to the Star systems between July 15, 2021 and July 17, 2021, and accessed information maintained on the Star systems. On August 24, 2021, Star discovered that the information accessed by the unauthorized person included documents relating to Star’s group health plan, including the name and Social Security number of nine New Hampshire residents. On October 22, 2021, Star notified the New Hampshire residents and notified this office.

Star continued its investigation and identified an additional 47 New Hampshire residents whose names and Social Security numbers were found in group health plan documents accessed by the unauthorized person. Beginning on November 10, 2021, those New Hampshire residents were mailed notice letters. A sample copy of the notification letter is enclosed Star offered the New

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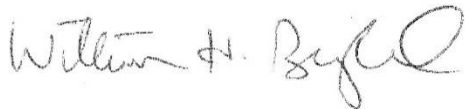
Hampshire residents complimentary one-year memberships to credit monitoring and identity theft protection services through Experian.

Star subsequently continued its investigation and on January 7, 2022, determined that further documents related to the group health plan were accessed by the unauthorized person, including the name and Social Security number of 22 additional New Hampshire residents. Beginning on January 26, 2022, Star is providing written notice to the additional New Hampshire residents via First Class U.S. Mail in accordance with HIPAA (45 CFR §§ 160.103 and 164.400 *et seq.*).<sup>1</sup> A sample copy of the notification letter is enclosed. Star is offering the New Hampshire residents complimentary one-year memberships to credit monitoring and identity theft protection services through Experian. Star has also established a dedicated call center where individuals may obtain more information regarding the incident.

To reduce the risk of a similar incident occurring in the future, Star took steps to enhance its existing network security protocols and enabled technical protections and monitoring tools on its systems.

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

Sincerely,

A handwritten signature in cursive script that reads "William H. Berglund".

William H. Berglund  
Counsel

Enclosure

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<sup>1</sup> Star Group is notifying your office of the incident in accordance with N.H. Rev. Stat. Ann. § 359-C:20.



<<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>>,

At Star Group, L.P. (“Star”), we understand the importance of protecting the information we maintain. We are writing to inform you of an incident that involved some of your information. This notice explains the incident, measures we have taken, and some steps that you may consider taking in response.

We identified a security incident that resulted in the encryption of certain systems within the Star environment. We immediately took actions to address the incident and restore operations. We also contacted law enforcement and began an investigation with the assistance of an outside cybersecurity firm. Our investigation determined that an unauthorized person obtained access to the Star systems between July 15, 2021 and July 17, 2021, and accessed information maintained on the Star systems. Over the past several months, we have been working to determine the extent of the access and specifically which documents were involved and their content. Although this review is ongoing, on August 24, 2021, we discovered that the information accessed by the unauthorized person included documents relating to Star’s group health plan. At this point in our review, it has been determined that the documents included some of your information, including your name and Social Security number, and may have contained one or more of the following: your address, date of birth, and health insurance information, such as member identification number, and plan selection information.

We wanted to notify you of this incident and assure you that we take it very seriously. We recommend that you remain vigilant for signs of unauthorized activity by reviewing any statements that you receive relating to your health insurance. If you identify any charges or activity that you did not authorize, please contact us immediately. Out of an abundance of caution, we have secured the services of Experian® IdentityWorks<sup>SM</sup> Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection support focused on immediate identification and resolution of identity theft. IdentityWorks is completely free to you and we understand that enrolling in this program will not hurt your credit score. For more information, including instructions on how to activate your complimentary one-year membership to IdentityWorks and additional steps you can take to help protect your information, please see the pages that follow this letter.

Star sincerely regrets that this incident occurred and apologizes for any inconvenience this may cause you. To help prevent something like this from happening again, and to further protect health plan data, we took steps to enhance our existing network security protocols, and enabled technical protections and monitoring tools on our systems. If you have any questions, please call 1-855-551-1668, Monday through Friday, from 9:00 a.m. to 6:30 p.m. Eastern Time, excluding major U.S. holidays.

Sincerely,

A handwritten signature in black ink that reads "Jeff Woosnam".

Jeff Woosnam  
President and CEO

## Activate IdentityWorks In Three Easy Steps

1. ENROLL by: <<b2b\_text\_6(Enrollment Deadline)>> (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: <https://www.experianidworks.com/3bcredit>
3. PROVIDE the **Activation Code**: <<Activation Code s\_n>>

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **877-288-8057** by <<b2b\_text\_6(Enrollment Deadline)>>. Be prepared to provide engagement number <<b2b\_text\_1(Engagement Number)>> as proof of eligibility for the identity restoration services by Experian.

### ADDITIONAL DETAILS REGARDING YOUR 12 MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **Experian credit report at sign-up:** See what information is associated with your credit file. Daily credit reports are available for online members only.\*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance\*\*:** Provides coverage for certain costs and unauthorized electronic fund transfers.

**Activate your membership today at <https://www.experianidworks.com/3bcredit>  
or call 877-288-8057 to register with the activation code above.**

**What you can do to protect your information:** There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration) for this information. If you have any questions about IdentityWorks, 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 877-288-8057

\* Offline members will be eligible to call for additional reports quarterly after enrolling.

\*\* The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

## 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](http://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](http://www.equifax.com), 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, [www.transunion.com](http://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](http://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](http://www.experian.com)
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, [www.transunion.com](http://www.transunion.com)
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, [www.equifax.com](http://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.

Star Group, L.P. can be contacted via mail at 9 West Broad Street, Suite 310, Stamford, CT 06902, or by phone at (203) 328-7310.

***Additional information for residents of the following states:***

**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](http://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> or *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](http://www.ncdoj.gov)