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July 17, 2020

File No. 34181.434

VIA E-MAIL

Attorney General Gordon MacDonald
Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301
E-mail: DOJ-CPB@doj.nh.gov

Re: Update Regarding Data Security Incident

Dear Attorney General MacDonald:

The purpose of this letter is to provide an update on the data security incident about which we notified you on June 19, 2020 on behalf of our client, STRATA Trust Co. ("STRATA"). After notifying your office of the incident, STRATA identified address information for an additional three individuals whom were determined to be New Hampshire residents. On July 10, 2020, STRATA notified these individuals and offered them complimentary services to assist. The total number of New Hampshire residents who were notified of the incident therefore is 37, and a sample notification letter is reattached here.

Please contact me should you have any questions.

Sincerely,

A handwritten signature in blue ink that reads 'David E. Artman'.

David E. Artman of
LEWIS BRISBOIS BISGAARD & SMITH LLP

DEA:acw

Encl.: Sample Consumer Notification Letter
June 19, 2020 Letter



7901 Woodway Drive
Waco, TX 76712

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

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

Subject: Notice of Data Security Incident

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

I am writing to inform you of a data security incident STRATA Trust Company ("STRATA") recently experienced and which may have involved your personal information. The privacy and security of customer information is of utmost importance to STRATA. That is why I am writing to inform you of this incident, provide you with steps you can take to help protect your personal information, and offer you complimentary identity monitoring services for 12 months.

What Happened? STRATA recently detected unusual activity involving an employee email account. Upon detecting a potential incident, we took immediate steps to contain the incident and launched an investigation to determine whether it involved any unauthorized access to personal information. Our investigation included retaining a digital forensics firm to assist. On May 21, 2020, we determined that your personal information could have been accessed in the incident. This access, if any, may have occurred in early February 2020. We therefore are notifying you of the incident, providing you with steps you can take to help protect your personal information, and offering you complimentary identity monitoring services for 12 months.

What Information Was Involved? The information that may have been affected includes your <<b2b_text_1(ImpactedData)>>.

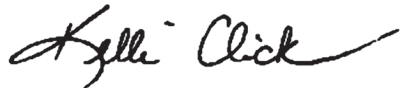
What Are We Doing? As soon as we discovered this incident, we took the measures referenced above. We also implemented enhanced security measures to better safeguard personal information in our possession and to help prevent a similar incident from occurring in the future. Out of an abundance of caution, we are also offering you complimentary identity monitoring services for 12 months through Kroll, an industry leader in identity monitoring services. The specific services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration. Additional information about your services is included with this letter.

What You Can Do? You can follow steps on the following page to help protect your personal information. We recommend that you activate the complimentary services that we are offering for 12 months through Kroll. You can activate the services online by visiting <<IDMonitoringURL>> and using the membership number: <<Member ID>>. To receive identity monitoring services, you must be over the age of 18, have established credit in the United States, have a Social Security number in your name, and have a U.S. residential address associated with your credit file. Please be advised that you must activate your services on or before <<date>>.

For More Information: More information about steps you can take to protect your personal information appears on the following page. If you have questions or need assistance, please call [1-800-877-7777](tel:1-800-877-7777), Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays.

The privacy and security of your personal information is of utmost importance to STRATA, and we regret any worry or inconvenience that this may cause.

Sincerely,

A handwritten signature in black ink that reads "Kelli Click". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Kelli Click
President
STRATA Trust Company

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print this form at <https://www.annualcreditreport.com/cra/requestformfinal.pdf>. You also can contact one of the following three national credit reporting agencies:

TransUnion P.O. Box 1000 Chester, PA 19016 1-800-916-8800 www.transunion.com	Experian P.O. Box 9532 Allen, TX 75013 1-888-397-3742 www.experian.com	Equifax P.O. Box 740241 Atlanta, GA 30374 1-800-685-1111 www.equifax.com	Free Annual Report P.O. Box 105281 Atlanta, GA 30348 1-877-322-8228 annualcreditreport.com
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Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 1 year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: You have the right to put a security freeze on your credit file. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. There is no charge to place, lift or remove the security freeze. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

Federal Trade Commission 600 Pennsylvania Ave, NW Washington, DC 20580 consumer.ftc.gov , and www.ftc.gov/idtheft 1-877-438-4338	Maryland Attorney General 200 St. Paul Place Baltimore, MD 21202 oag.state.md.us 1-888-743-0023	North Carolina Attorney General 9001 Mail Service Center Raleigh, NC 27699 ncdoj.gov 1-877-566-7226	Rhode Island Attorney General 150 South Main Street Providence, RI 02903 http://www.riag.ri.gov 401-274-4400
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You also have certain rights under the Fair Credit Reporting Act (FCRA), including: to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information, as well as others. For more information about the FCRA, and your rights pursuant to the FCRA, please visit http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.

Personal Information of a Minor: You can request that each of the three national credit reporting agencies perform a manual search for a minor's Social Security number to determine if there is an associated credit report. Copies of identifying information for the minor and parent/guardian may be required, including birth or adoption certificate, Social Security card, and government issued identification card. If a credit report exists, you should request a copy of the report and immediately report any fraudulent accounts to the credit reporting agency. You can also report any misuse of minor's information to the FTC at <https://www.identitytheft.gov/>. For more information about Child Identity Theft and instructions for requesting a manual Social Security number search, visit the FTC website: <https://www.consumer.ftc.gov/articles/0040-child-identity-theft>.

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will 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 will have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. 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 Theft Restoration

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



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June 19, 2020

File No. 28759.1283

VIA E-MAIL

Attorney General Gordon MacDonald
Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301
E-Mail: DOJ-CPB@doj.nh.gov

Re: Notice of Data Security Incident

Dear Attorney General MacDonald:

I represent STRATA Trust Company ("STRATA"), located in Austin, Texas, with respect to a data security incident that may have involved personal information for 34 New Hampshire residents. On June 19, 2020, STRATA notified the potentially-affected individuals. The reason I am writing now is to provide formal notice to your office.

STRATA recently detected unusual activity involving an employee email account. Upon detecting this activity, STRATA immediately contained it and launched an investigation, which including retaining a digital forensics firm, to determine whether it involved any unauthorized access to personal information. On May 21, 2020, the investigation determined that personal information for some STRATA customers could have been accessed without authorization in early February 2020. The information varies by individual but may include names, Social Security numbers, or financial account numbers. On June 19, 2020, STRATA notified the potentially-affected individuals and offered them complimentary services to assist, including credit monitoring, fraud consultation, and identity theft restoration services.

Please contact me should you have any questions.

Sincerely,

A handwritten signature in blue ink that reads 'David E. Artman'.

David E. Artman of
LEWIS BRISBOIS BISGAARD & SMITH LLP

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