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ATTORNEYS AT LAW

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APR 23 2018

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CONSUMER PROTECTION  
1275 Drummers Lane, Suite 302  
Wayne, PA 19087

April 19, 2018

**VIA U.S. 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 General MacDonald:

We represent Strategic Analysis, Inc. ("Strategic Analysis"), 4075 Wilson Blvd., Suite 200, Arlington, VA 22203, and are writing to notify your office of an incident that may affect the security of personal information relating to one (1) New Hampshire resident. The investigation into this event is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Strategic Analysis does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

**Nature of the Data Event**

On November 23, 2017, Strategic Analysis received indications of suspicious activity involving certain systems in our IT infrastructure. Strategic Analysis promptly launched an internal investigation and engaged cybersecurity forensic firms to assist in assessing the potential security event and to secure any potentially affected accounts, systems, and data. During the course of the investigation, we became aware of unauthorized access to a number of Strategic Analysis accounts, systems, and data beginning April 20, 2015 and continuing through January 16, 2018.

**Notice to New Hampshire Resident**

On April 19, 2018, Strategic Analysis will provide written notice of this incident to all affected individuals, which includes one (1) New Hampshire resident. Written notice was provided in substantially the same form as the letter attached here as *Exhibit A*.

Attorney General Gordon J. MacDonald

April 19, 2018

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### **Other Steps Taken and to Be Taken**

With guidance from and in coordination with our outside cybersecurity forensic firms, we have worked diligently and responsibly to secure our accounts, systems and data. We confirmed the actions taken to respond to this event were successful and our accounts, systems and data were secure on March 23, 2018 and Strategic Analysis accounts, systems and data were not subject to unauthorized access as of January 16, 2018.

Strategic Analysis is providing all potentially affected individuals access to one (1) free year of credit and identity monitoring services, including identity restoration services, through AllClear ID, and has established a dedicated hotline for potentially affected individuals to contact with questions or concerns regarding this incident. Additionally, Strategic Analysis is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud, including 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. Strategic Analysis is also providing written notice of this incident to other state regulators as necessary.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 267-930-4799.

Very truly yours,



Sian Schafle of

MULLEN COUGHLIN LLC

SMS: ngo  
Enclosure

# **EXHIBIT A**



00001  
JOHN Q. SAMPLE  
1234 MAIN STREET  
ANYTOWN US 12345-6789

April 19, 2018

**Re: Notice of Data Breach**

Dear John Sample,

We write to inform you of unauthorized access to a number of Strategic Analysis, Inc. (“SA”) accounts, systems, and data that may affect the security of some of your personal information (the “security event”). We take this security event very seriously and are providing you with information and access to resources so that you can better protect your personal information from potential misuse, should you feel it is appropriate to do so.

**What Happened?** On November 23, 2017, SA received indications of suspicious activity involving certain systems in our IT infrastructure. SA promptly launched an internal investigation and engaged cybersecurity forensic firms to assist in assessing the potential security event and to secure any potentially affected accounts, systems, and data. During the course of the investigation, we became aware of unauthorized access to a number of SA accounts, systems, and data beginning April 20, 2015 and continuing through January 16, 2018.

**What Information Was Involved?** We identified that the data that could have been subject to unauthorized access includes your **Bank Account Number and Routing Number**. We have not received any evidence that your information has been subject to misuse by any unauthorized individuals. SA will be notifying certain state regulators, as required by law.

**What We Are Doing.** With guidance from and in coordination with our outside cybersecurity forensic firms, we have worked diligently and responsibly to secure our accounts, systems and data. We confirmed the actions taken to respond to this event were successful and our accounts, systems and data were secure on March 23, 2018 and SA accounts, systems and data were not subject to unauthorized access as of January 16, 2018.

As an added precaution, we are also offering you access to one (1) year of credit monitoring and identity theft restoration services through AllClear ID at no cost to you. The cost of this service will be paid for by SA.

**What You Can Do.** Please review the enclosed “Steps You Can Take to Protect Your Information.” You can also enroll to receive the free credit monitoring and identity theft protection services we are offering.



***For More Information.*** We understand that you may have questions about this event that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-855-865-6892.

Sincerely,

A handwritten signature in black ink, appearing to read "Lindsay Samora", followed by a horizontal flourish.

Lindsay Samora  
President and CEO  
Strategic Analysis, Inc. (SA)

## **STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION**

### **Enroll in Credit Monitoring**

**CODE: Redemption Code**

As an added precaution, we have arranged to have AllClear ID protect your identity for one (1) year at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next one (1) year.

**AllClear Identity Repair:** This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-865-6892 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

**AllClear Fraud Alerts with Credit Monitoring:** This service offers the ability to set, renew, and remove 90-day fraud alerts on your credit file to help protect you from credit fraud. In addition, it provides credit monitoring services, a once annual credit score and credit report, and a \$1 million identity theft insurance policy. For a child under 18 years old, AllClear ID ChildScan identifies acts of fraud against children by searching thousands of public databases for use of your child's information. To enroll in this service, you will need to provide your personal information to AllClear ID. You may sign up online at [enroll.allclearid.com](http://enroll.allclearid.com) or by phone by calling 1-855-865-6892 using the following redemption code: Redemption Code.

Please note: Following enrollment, additional steps are required by you in order to activate your phone alerts and fraud alerts, and to pull your credit score and credit file. Additional steps may also be required in order to activate your monitoring options.

### **Monitor Your Accounts**

**Credit Reports.** We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your personal account statements and monitoring your free credit reports for suspicious activity and to detect errors. 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. Contact information for the credit reporting agencies can be found below.

**Fraud Alerts.** At no charge, you can also have the three major credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it requires creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below:

Equifax  
P.O. Box 105069  
Atlanta, GA 30348  
1-800-525-6285  
[www.equifax.com](http://www.equifax.com)

Experian  
P.O. Box 2002  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com](http://www.experian.com)

TransUnion  
P.O. Box 2000  
Chester, PA 19016  
1-800-680-7289  
[www.transunion.com](http://www.transunion.com)

**Security Freeze.** You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft, and you provide the credit bureau with a valid police report, it cannot charge you to place, lift, or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. Fees vary based on where you live, but commonly range from \$3 to \$15. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. In order to request a security freeze, you will need to supply your full name, address, date



of birth, Social Security number, current address, all addresses for up to five previous years, email address, a copy of your state identification card or driver's license, and a copy of a utility bill, bank or insurance statement, or other statement proving residence. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze  
P.O. Box 105788  
Atlanta, GA 30348  
1-800-685-1111  
[www.freeze.equifax.com](http://www.freeze.equifax.com)

Experian Security Freeze  
P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/freeze/](http://www.experian.com/freeze/)

TransUnion  
P.O. Box 2000  
Chester, PA 19016  
1-888-909-8872  
[www.transunion.com/  
credit-freeze/place-credit-freeze](http://www.transunion.com/credit-freeze/place-credit-freeze)

**Additional Information.** You can further educate yourself regarding identity theft, security freezes, fraud alerts, and the steps you can take to protect yourself against identity theft and fraud by contacting the Federal Trade Commission or your state Attorney General, as well as the credit reporting agencies listed above. 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); and TTY: 1-866-653-4261. The Federal Trade Commission encourages those who discover that their information has been misused to file a complaint with them. Instances of known or suspected identity theft should be reported to law enforcement, the Federal Trade Commission, and your state Attorney General. This letter to you regarding this incident has not been delayed as the result of a law enforcement investigation.

**For Maryland residents**, the Maryland 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). Strategic Analysis is located at 4075 Wilson Boulevard, Suite 200, Arlington, Virginia 22203.

**For North Carolina residents**, the North Carolina Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; by phone 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 Rhode Island 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 two (2) Rhode Island residents are potentially impacted by this incident. You have the right to file and obtain a police report if you ever experience identity theft or fraud. Please note that, in order to file a crime report or incident report with law enforcement for identity theft, you may be asked to provide some kind of proof that you have been a victim.

**For New Mexico residents**, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act: the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from a violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf), or by writing to the Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington.