

**RECEIVED**

**OCT 26 2018**

**CONSUMER PROTECTION**

October 22, 2018

**Kevin M. Scott**  
312.821.6131 (direct)  
Kevin.Scott@wilsonelser.com

**Attorney General Joseph A. Foster**  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03302

Re: Data Security Incident

Dear Attorney General Foster:

We represent Strategic Risk Solutions (“SRS”), located in Concord, Massachusetts and other locations, with respect to a potential data security incident described in more detail below. SRS takes the security and privacy of the information in its control very seriously, and has taken steps to prevent a similar incident from occurring in the future.

**1. Nature of the security incident.**

On April 4, 2018, SRS received a phishing email that was designed to obtain login credentials of the recipient of the email. On April 5, 2018, the same employee received a spoofed email, purportedly from SRS’ President, asking the employee to execute a wire transfer. The employee called the President of SRS and, thereby thwarted the attempted wire transfer fraud. Later on April 5, 2018, a number of phishing emails were sent from the same employee’s account.

SRS conducted an extensive investigation to determine what, if any, information was potentially compromised. On May 14, 2018 SRS learned from forensic investigators that two of its employee email accounts were potentially compromised as a result of the phishing email received on April 4, 2018. SRS then conducted a review of all the documents and materials that could have been accessed and determined that some of the documents and materials included personally identifiable information requiring notification to the affected individuals.

**2. Number of New Hampshire residents affected.**

A total of three (3) New Hampshire residents may have been potentially affected by this incident. Notification letters to these individuals were mailed on October 22, 2018, by first class mail. A sample copy of the notification letter is included with this letter.

**3. Steps taken.**

SRS has taken steps to prevent the likelihood of a similar event from occurring in the future, and to protect the privacy and security of potentially impacted individuals’ information. This includes implementing new



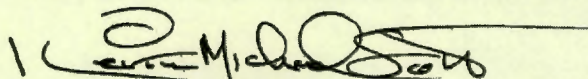
security technologies around SRS' most sensitive systems and data and improving its ability to detect and respond to external attacks of its data network, as well as enhanced employee data security training. SRS provided potentially affected individuals with identity theft restoration and credit monitoring services for 12 months at no cost to the individual, through Kroll.

**4. Contact information.**

SRS remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at [Kevin.Scott@wilsonelser.com](mailto:Kevin.Scott@wilsonelser.com) or (312) 821-6131.

Very truly yours,

**Wilson Elser Moskowitz Edelman & Dicker LLP**

  
Kevin M. Scott

Enclosure.





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

<<MemberFirstName>> <<MemberMiddleName>> <<MemberLastName>> <<Suffix>>  
<<Address1>>  
<<Address2>>  
<<City>> <<State>> <<ZipCode>>

Dear <<MemberFirstName>> <<MemberLastName>>,

As a precautionary measure, we are notifying you about a data security incident that may involve your personal information.

On April 5, 2018, we discovered suspicious activity on an employee's email account. We immediately investigated the activity and discovered possible unauthorized access to a limited number of our employees' email accounts. We retained forensic experts to further investigate what information could have been obtained during the unauthorized access. After a comprehensive review, we discovered that some of your personal information may have been contained within the email contents that were potentially at risk during the incident. This information may have included your name, address, date of birth and Social Security number. We have no evidence of misuse of anyone's personal information; nonetheless, we are proactively notifying you out of an abundance of caution.

To help relieve concerns following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultations, and Identity Theft Restoration.

Visit [krollbreach.idMonitoringService.com](http://krollbreach.idMonitoringService.com) to activate and take advantage of your identity monitoring services.

*You have until January 20, 2019 to activate your identity monitoring services.*

Membership Number: <<Member ID>>

To receive credit services by mail instead of online, please call 1-844-263-8605. Additional information describing your services is included with this letter.

We assure you that we are taking every step possible to prevent a similar event from occurring in the future. These steps include changing the passwords of the affected email accounts and increasing the security components of our policies and procedures.

The attached also provides information on steps you can take to protect your personal information. If you have any questions, please call 1-866-775-4209, Monday through Friday, from 9:00 a.m. to 6:30 p.m., Eastern Time.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Berry', is written over a light gray rectangular background.

Andrew Berry  
COO & Managing Director



## Additional Important Information

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### For residents of Hawaii, Michigan, Missouri, Virginia, Vermont, and North Carolina:

It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

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### For residents of Illinois, Iowa, Maryland, Missouri, North Carolina, Oregon, and West Virginia:

It is required by state laws to inform you that you may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com), or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

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### For residents of Iowa:

State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

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### For residents of Oregon:

State laws advise you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

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### For residents of Maryland, Rhode Island, Illinois, and North Carolina:

You can obtain information from the Maryland and North Carolina Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

#### Maryland Office of the Attorney General

Consumer Protection Division  
200 St. Paul Place  
Baltimore, MD 21202  
1-888-743-0023  
[www.oag.state.md.us](http://www.oag.state.md.us)

#### Rhode Island Office of the Attorney General

Consumer Protection  
150 South Main Street  
Providence RI 02903  
1-401-274-4400  
[www.riag.ri.gov](http://www.riag.ri.gov)

#### North Carolina Office of the Attorney General

Consumer Protection Division  
9001 Mail Service Center  
Raleigh, NC 27699-9001  
1-877-566-7226  
[www.ncdoj.com](http://www.ncdoj.com)

#### Federal Trade Commission

Consumer Response Center  
600 Pennsylvania Ave, NW  
Washington, DC 20580  
1-877-IDTHEFT (438-4338)  
[www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)

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### For residents of Massachusetts:

It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft

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### For residents of all states:

**Fraud Alerts:** You can place fraud alerts with the three credit bureaus by phone and online with Equifax ([https://assets.equifax.com/assets/personal/Fraud\\_Alert\\_Request\\_Form.pdf](https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf)) or Experian (<https://www.experian.com/fraud/center.html>). A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

**Monitoring:** You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

**Security Freeze:** You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

#### Equifax Security Freeze

P.O. Box 105788  
Atlanta, GA 30348  
[www.freeze.equifax.com](http://www.freeze.equifax.com)  
800-525-6285

#### Experian Security Freeze

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

#### TransUnion (FVAD)

P.O. Box 2000  
Chester, PA 19022  
[freeze.transunion.com](http://freeze.transunion.com)  
800-680-7289

More information can also be obtained by contacting the Federal Trade Commission listed above.





## TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services<sup>1</sup> 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'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

### **Web Watcher**

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

### **Public Persona**

Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you'll receive an alert.

### **Quick Cash Scan**

Quick Cash Scan monitors short-term and cash-advance loan sources. You'll receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.

### **\$1 Million Identity Fraud Loss Reimbursement**

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

### **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 can dig deep to uncover the scope of the identity theft, and then work to resolve it.

<sup>1</sup> Kroll's activation website is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.