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June 3, 2021

VIA EMAIL

Consumer Protection Bureau
Office of the Attorney General of New Hampshire
33 Capitol Street
Concord, NH 03301
(603) 271-3643
DOJ-CPB@doj.nh.gov

Re: Notice of Data Breach

Dear Sir or Madam:

We represent the Supplemental Income 401(k) Plan (“the Plan”), a multi-employer ERISA-covered retirement plan. The mailing address of the Plan is 420 Virginia Street, Suite 2-B, Vallejo, CA 94590. We are writing to notify you on behalf of our client of a data security incident that occurred at one of the Plan’s third party administrators (the “Administrator”) and potentially affected the personal information of residents of New Hampshire. This notice may be supplemented upon any further investigation. By providing this notice, the Plan does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the relevant state statute, or personal jurisdiction.

Background: The Plan was recently notified by the Administrator that it was the victim of a likely phishing attack that resulted in the compromise of a single email account at the Administrator. After conducting a review of the incident, the Administrator confirmed that a third party gained unauthorized access to the email account beginning around March 22, 2021 and the unauthorized access was shut off on April 21, 2021. The review also determined that the email account included files containing certain personal information.

A leading forensic firm was retained to assist in conducting a review of the incident to determine the nature and scope of the unauthorized access. The firm also reviewed the affected email account to determine the nature of any personal information contained therein. The personal information at issue for New Hampshire residents includes name, address, date of birth, Social Security number, account balance, enrollment date, and contribution amounts. The Plan has taken additional security monitoring measures to help further protect against this type of incident going forward.

Notice to New Hampshire Residents: We have determined that the number of New Hampshire residents potentially affected by this security incident is 1. The Plan intends to begin mailing notice to the impacted individual on June 4, 2021. Written notice to individuals is being provided in substantially the same form as the letter attached here as Exhibit A. Please note that we reserve the right to update the draft letter.

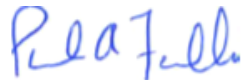
CONFIDENTIAL

Other Steps Taken and To Be Taken: The Plan is taking action to provide assistance to potentially affected individuals, even though it currently has no evidence of any misuse of or fraudulent activity relating to anyone's personal information as a result of this incident. The Plan is providing individuals whose personal information was potentially affected by this incident with access to credit monitoring services for 24 months through Experian at no cost to the individuals.

Additionally, the Plan is providing impacted individuals with guidance on how to better protect against identity theft and fraud. These measures include advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. The Plan is also providing individuals with information on how to place a fraud alert and security freeze on their 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 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.

Contact Information: Should you have any questions regarding this notification or other aspects of the data security incident, please contact us at (212) 218-5558 or pferrillo@seyfarth.com.

Very truly yours,



Paul Ferrillo
Seyfarth Shaw LLP

EXHIBIT A

May [], 2021

<first name, middle name, last name, suffix>
<address1>
<address2>
<city, state, postal code>

Notice of Data Breach

Hello <first name, middle name, last name, suffix>,

We are writing on behalf of the Supplemental Income 401(k) Plan (hereafter referred to as “We” or “the Plan”) to advise you of an incident that occurred at a third party Plan administrator (the “Administrator”) that affects some of your personal information. Please read below for additional information about the matter and for additional details on steps you can take to help protect yourself.

What Happened? The Administrator became aware and notified the Plan that it was the victim of a likely phishing attack resulting in the compromise of a single email account at the Administrator. After conducting a review of the incident, the Administrator confirmed that a third party gained unauthorized access to the email account beginning around March 22, 2021 and the unauthorized access was shut off on April 21, 2021. The email account included files containing certain personal information.

What Information Was Involved? The personal information in the impacted account included your name, address, date of birth, Social Security number, account balance, enrollment date, and contribution amount. At this time, we are not aware of any fraudulent activity relating to your personal information as a result of this incident.

What We Are Doing. After the Administrator became aware of the incident, a leading third-party forensic firm was retained to conduct a review of the incident and determine the nature and scope of the unauthorized access. The Plan has taken additional security monitoring measures to help further protect against this type of incident going forward.

Although we are not aware of any identity theft as a result of this incident, as an added precaution we are offering a complimentary 24-month membership of Experian’s IdentityWorksSM at no cost to you. Additional details of the Experian IdentityWorksSM service are provided in Appendix A. Please note that you must enroll to take advantage of this free service and we encourage you to do so.

What You Can Do. As always, we recommend that you remain vigilant for incidents of fraud and identity theft, including by carefully reviewing your account records for suspicious or unauthorized activity and monitoring your free credit reports. For more information on how you can help protect yourself, please review the enclosed *Steps You Can Take to Help Protect Against Identity Theft and Fraud* in Appendix B.

For More Information. We understand that you may have questions about this incident that may not be addressed in this letter. If you have additional questions, or need assistance, please call 1-800-560-3243 Monday through Friday between 8:00 a.m. to 6:00 p.m. Eastern Standard Time.

The security of your personal information is a priority for the Plan, and we sincerely regret any inconvenience or concern caused by this incident.

Sincerely,

Paul Ferrillo

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APPENDIX A

ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

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

You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **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.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for 24 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While Identity Restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorksSM as a complimentary two-year membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information please follow the steps below:

1. Ensure that you **enroll by:** {mm/dd/yyyy} (Your code will not work after this date.)
2. **Visit** the Experian IdentityWorks website to enroll: www.ExperianIdWorks.com/3bplus
3. Provide your **activation code:** {Activation Code}

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 **1-877-890-9332** by [Enrollment End Date]. Be prepared to provide engagement number [DB#####] as proof of eligibility for the Identity Restoration services by Experian.

* 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.

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APPENDIX B**Steps You Can Take to Help Protect Against Identity Theft and Fraud**

Monitor Your Accounts: The Plan encourages you to remain vigilant against incidents of fraud or identity theft. We recommend you review your account statements and monitor your credit reports for any suspicious activity. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting agencies. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit reporting agencies listed below directly to purchase a copy of your credit report.

Equifax

P.O. Box 740241
Atlanta, GA 30374-0241
1-800-525-6285
www.equifax.com

Experian

P.O. Box 9701
Allen, TX 75013-9701
1-888-397-3742
www.experian.com

TransUnion

P.O. Box 1000
Chester, PA 19016-1000
1-800-680-7289
www.transunion.com

When you receive your credit reports, review them carefully. Look for accounts or creditor inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number that is not accurate. If you see anything you do not understand, call the credit reporting agency at the telephone number on the report.

Security Freeze: You have the right to place a "security freeze," also known as a credit freeze, on your credit file. No new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to access your credit report unless you temporarily lift the freeze. Therefore, 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 credit reporting agencies listed below:

TransUnion

P.O. Box 2000 Chester, PA 19016
1-800-909-8872
www.transunion.com/credit-freeze

Experian

PO Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/

Equifax

PO Box 105788 Atlanta, GA
30348-5788
1-800-685-1111
www.equifax.com/personal/credit-report-services/credit-freeze/

You must separately place a credit freeze on your credit file at each credit reporting agency. In order to request a security freeze, you will need to provide the following information:

- Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
- Social Security number;
- Date of birth;

- If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
- Proof of current address, such as a current utility bill or telephone bill;
- A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, etc.);
- If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft;
- Other personal information, as required by the applicable credit reporting agency.

If you request a credit freeze online or by phone, then the credit reporting agencies have one (1) business day after receiving your request to place a credit freeze on your credit file report. If you request a lift of the credit freeze online or by phone, then the credit reporting agency must lift the freeze within one (1) hour. If you request a credit freeze or lift of a credit freeze by mail, then the credit agency must place or lift the credit freeze no later than three (3) business days after getting your request.

Fraud Alerts: You also 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:

Trans Union

P.O. Box 2000 Chester, PA
19106
1-800-680-7289

www.transunion.com/fraud-alerts

Experian

P.O. Box 2002
Allen, TX 75013
1-888-397-3742

www.experian.com/fraud/center.htm

Equifax

P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008

www.equifax.com/personal/credit-report-services/credit-fraud-alerts/

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to your state Attorney General.

Additional information on how to protect your identity: You can also 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, your state Attorney General, or the Federal Trade Commission (FTC). The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (877-438-4338); and 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 also obtain further information on how to file such a complaint by way of the contact information listed above. Instances of known or suspected identity theft should be reported to law enforcement and your state Attorney General.

For District of Columbia Residents: You may also obtain information from the Office of the Attorney General for the District of Columbia.

Office of the Attorney General for the District of Columbia

400 6th Street, NW
Washington, DC 20001
1-202-727-3400
oag@dc.gov

For Iowa Residents: You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

Office of the Attorney General of Iowa

1305 E. Walnut Street
Des Moines, Iowa 50319-0106
1-515-281-5926

For Maryland Residents: You may also obtain information from the Maryland Office of the Attorney General about steps you can take to help prevent identity theft:

Maryland Office of the Attorney General

Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
www.marylandattorneygeneral.gov

For Massachusetts Residents: Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

Under Massachusetts law, you may also place, lift, or remove a security freeze on your credit reports, free of charge. You must place your request for a freeze with each of the three major consumer reporting agencies as detailed above.

For New York Residents: You may also contact the following state agencies for information regarding security breach response and identity theft prevention and protection information:

New York Attorney General's Office

1-800-771-7755
<https://ag.ny.gov/internet/privacy-and-identity-theft/>

New York Department of State Division of Consumer Protection

1-800-697-1220
<https://www.dos.ny.gov/consumerprotection>

For North Carolina Residents: You may also obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office:

North Carolina Attorney General's Office

Consumer Protection Division
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-5-NO-SCAM
www.ncdoj.gov

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 violators. 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, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For Oregon Residents: You are advised to report any suspected identity theft to law enforcement, including the Oregon Attorney General.

Oregon Department of Justice, Office of the Attorney General

1162 Court St. NE
Salem, OR 97301-4096
1-800-850-0228