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CONSUMER PROTECTION

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December 6, 2019

VIA OVERNIGHT MAIL

Attorney General Gordon MacDonald
New Hampshire Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Incident Notification

Dear Attorney General MacDonald:

We are writing on behalf of our client, TDC Virginia Benefits & Risk Management, Inc. (“TDC”), to notify you of a security incident involving one New Hampshire resident.¹ TDC is a corporate benefits advisor hired by organizations to provide insurance brokerage and consulting services.

TDC’s ongoing investigation into an email incident recently determined that an unauthorized person had obtained access to an email account belonging to a TDC employee for an unknown period of time. Upon first learning of the incident, TDC secured the employee’s email account, launched an investigation to determine the nature and scope of the incident, and a computer security firm was engaged to assist. Due to the nature of the unauthorized access to the account, TDC was unable to determine which specific emails or attachments, if any, may have been viewed by the unauthorized individual. TDC, therefore, conducted a comprehensive review of the emails and attachments in the account.

Through TDC’s analysis of the emails and attachments contained in the employee’s email account, TDC identified information relating to some of its clients’ current or former employees on September 30, 2019. TDC received this information in connection with the insurance brokerage and consulting services it provides. Accordingly, on October 8, 2019, pursuant to N.H. Rev. Stat. § 359-C:20(c), TDC notified its clients of the incident and offered to provide notification to the employees on the clients’ behalf. Beginning today, December 6, 2019, TDC is providing notice to

¹ This notice does not waive TDC’s objection that New Hampshire lacks personal jurisdiction over it regarding any claims related to this incident.

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Denver
Houston Los Angeles New York Orlando Philadelphia Seattle Washington, DC

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one New Hampshire resident whose name and Social Security number were identified in the email account.²

The New Hampshire resident is being notified in substantially the same form as the enclosed letter via U.S. First-Class mail. TDC is offering the individual a complimentary, one-year membership to credit monitoring and identity theft prevention services. TDC has also established a dedicated call center where all individuals may obtain more information regarding the incident.

TDC has taken steps to help prevent a similar incident from occurring in the future, including implementing additional procedures to further expand and strengthen its security processes, and are also providing continued education and training to its employees.

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

Sincerely,



Patrick H. Haggerty
Partner

Enclosure

² TDC is notifying the New Hampshire resident on behalf of the following entity: Christendom Educational Corp.



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

<<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

Dear <<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>,

TDC Virginia Benefits & Risk Management, Inc. ("TDC") is a corporate benefits advisor hired by organizations to provide insurance brokerage and consulting services. To accomplish this function, our clients provide us with necessary data about policy participants. TDC places a high value on maintaining the integrity and security of the data we hold for clients. Regrettably, we write to inform you of a recent incident that may have involved your information, which was provided to TDC by <<ClientDef2(Company Name)>> in connection with the services we provide. This notice describes the incident, outlines the measures we have taken in response, and advises you on steps you can take to further protect your information.

On August 13, 2019, our ongoing investigation into an email incident determined that an unauthorized person had obtained access to an email account belonging to a TDC employee for an unknown period of time. Upon first learning of the incident on August 9, 2019, we secured the employee's email account, launched an investigation to determine the nature and scope of the incident, and engaged a computer security firm to assist. Due to the nature of the unauthorized access to the account, we were unable to determine which specific emails or attachments, if any, may have been viewed by the unauthorized individual. We, therefore, conducted a comprehensive review of the emails and attachments in the account and determined on September 30, 2019 that an email or an attachment contained your <<ClientDef1(Data Impacted)>>.

Although we have no indication that your information has been accessed or misused in any way, out of an abundance of caution, we wanted to advise you of this incident and assure you that we take this very seriously. It is always advisable to remain vigilant by reviewing your account statements and credit reports for any unauthorized activity. As an added precaution, 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, Fraud Consultation, and Identity Theft Restoration.

Visit krollbreach.idMonitoringService.com to activate and take advantage of your identity monitoring services.

You have until **February 24, 2020** to activate your identity monitoring services.

Membership Number: <<Member ID>>

For more information on identity theft prevention and your complimentary one-year membership, please see the additional information provided in this letter.

We apologize for any concern or inconvenience this incident may cause. We want to assure you that we have taken steps to help prevent a similar event from occurring in the future, and to protect the privacy and security of client information. As a result of this incident, we are implementing additional procedures to further expand and strengthen our security processes, and are also providing continued education and training to our employees. If you have questions about this matter please call 1-833-942-1223, Monday through Friday between 9:00 a.m. and 6:30 p.m. Eastern Time.

Sincerely,

Melanie Marks Hitchen
TDC Benefits & Risk Management

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 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, 1-800-685-1111

Experian, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742

TransUnion, PO Box 2000, Chester, PA 19016, 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

Residents of **Maryland, New York, North Carolina, or Rhode Island**, 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

New York Attorney General's Office, The Capitol, Albany, NY 12224, 1-212-416-8433, www.ag.ny.gov

North Carolina Attorney General's Office, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6400 / 1-877-566-7226, www.ncdoj.gov

Rhode Island Attorney General's Office, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov

If you are a resident of **Rhode Island**, note that pursuant to Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze (see Credit Freeze section, below).

If you are a resident of **West Virginia**, you have the right to ask that nationwide consumer reporting agencies place "fraud alerts" in your file to let potential creditors and others know that you may be a victim of identity theft, as described below. You also have a right to place a security freeze on your credit report, as described below.

Fraud Alerts: There are two types of 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 (1) 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 (7) years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies.

Credit Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, so that no new credit can be opened in your name without the use of a PIN that is issued to you when you initiate a freeze. A security freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a security freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a security freeze may delay your ability to obtain credit.

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

TransUnion Security Freeze, PO Box 2000, Chester, PA 19016, www.transunion.com

Equifax Security Freeze, PO Box 105788, Atlanta, GA 30348, www.equifax.com

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.)
2. Social Security number
3. Date of birth
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years
5. Proof of current address such as a current utility bill or telephone bill
6. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.)
7. If you are a victim of identity theft, include a copy of the police report, investigative report, or complaint to a law enforcement agency concerning identity theft

The credit reporting agencies have one business day after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five business days and provide you with a unique personal identification number ("PIN") or password or both that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, or to lift a security freeze for a specified period of time, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to the credit reporting agencies and include proper identification (name, address, and Social Security number) and the PIN or password provided to you when you placed the security freeze as well as the identity of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have one hour after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to each of the three credit bureaus and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have one hour after receiving your request by toll-free telephone or secure electronic means, or three business days after receiving your request by mail, to remove the security freeze.

If your health insurance or medical information was involved, it is also advisable to review the billing statements or explanation of benefits you receive from your health insurer or healthcare provider. If you see charges for services you did not receive, please contact the insurer or provider immediately.

A Summary of Your Rights Under the Fair Credit Reporting Act: The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Here is a summary of your major rights under FCRA. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- 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 reports to be provided to employers.
- You may limit "prescreened" offers of credit and insurance you get based on information in your credit report.

- You have a right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.

*TDC Virginia Benefits & Risk Management
202 West Boscawen Street
Winchester, VA 22601
(540)-723-4911*



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services¹ from Kroll:

Triple Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data at any of the three national credit bureaus—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.

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.

¹ Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge. 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.