

March 24, 2021

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Via electronic-mail: [DOJ-CPB@doj.nh.gov](mailto:DOJ-CPB@doj.nh.gov); [AttorneyGeneral@doj.nh.gov](mailto:AttorneyGeneral@doj.nh.gov)

**Attorney General Gordon McDonald**

Consumer Protection Bureau  
Office of the Attorney General  
33 Capitol Street  
Concord, New Hampshire 03302

Notice of Data Breach

**Re: Our Client : TradeSource, Inc.**  
**Matter : Data Security Incident on December 27, 2020**  
**Wilson Elser File # : 23367.00001**

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Dear Attorney General McDonald:

We represent TradeSource, Inc. (“TSI”), located in Warwick, Rhode Island, with respect to a data security incident described in more detail below. TSI takes the security and privacy of the information in its control seriously, and has taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the security breach, what information may have been compromised, the number of New Hampshire residents being notified, and the steps that TSI has taken in response to this incident. We have also enclosed hereto a sample of the notification made to the potentially impacted individuals, which includes an offer of free credit monitoring.

1. Nature of the Security Incident

On December 27, 2020, TSI detected a data security incident occurring on its network environment. This incident may have resulted in the exposure of personal information. Although we have found no evidence that any information has been specifically accessed for misuse, it is possible that the potentially impacted individuals’ full name, mailing address, birthdate, and social security number could have been exposed as a result of this unauthorized activity.

As of this writing, TSI has not received any reports of related identity theft since the date of the incident (December 27, 2020 to present).

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## 2. Number of New Hampshire Residents Affected

A total of eight hundred fifty-two (852) residents of New Hampshire were potentially affected by this security incident. Notification letters to these individuals were mailed on March 22, 2021, by first class mail. A sample copy of the notification letter is included with this letter.

## 3. Steps Taken

Upon detecting this incident, TSI moved quickly to initiate a response, which included engaging third-party cybersecurity and IT specialists to secure TSI's network environment and conduct a comprehensive investigation into the incident. TSI has been working with law enforcement to help respond to this incident. TSI has reviewed and altered its policies and procedures relating to the security of its systems and servers, as well as its information life cycle management.

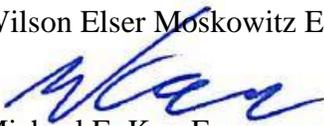
Although TSI is not aware of any evidence of misuse of personal information, TSI extended to all potentially impacted individuals an offer for free credit monitoring and identity theft protection through IDX. This service will include at least 12 months of credit monitoring, along with a fully managed id theft recovery service, should the need arise.

## 4. Contact Information

TSI 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 Michael.Kar@WilsonElser.com or 212.915.5535.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP



Michael E. Kar, Esq.

Copy: Wilson Elser LLP  
Attn: Robert Walker, Esq.

Enclosure: *Sample Notification Letter*



C/O IDX  
P.O Box 989728  
West Sacramento, CA 95798-9728

To enroll in free credit monitoring, call:  
(833) 416-0858

Or Visit: <https://app.idx.us/account-creation/protect>

Enrollment Code: <<Enrollment Code>>

**Via First-Class Mail**

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

<<Date>>

Notice of Data Breach

Dear <<FirstName>> <<LastName>>,

TradeSource, Inc. (“TradeSource”) specializes in staffing for skilled construction industry personnel. We are writing in order to inform you of an incident that may have exposed your sensitive personal information. We take the security of your personal information seriously and want to provide you with information and resources you can use to protect your information.

What Happened and What Information was Involved?:

TradeSource experienced a data security incident on December 27, 2020. Upon detection, we immediately took steps to secure our environment, investigate and determine the nature of the incident, as well as enhance our network security measures.

A comprehensive investigation was done to identify any instances of sensitive data compromise. Due to the compromise of our network, TradeSource has arranged for notification of all individuals whose information could have been exposed during the data security incident.

Accordingly, this letter serves to notify you that it is possible that your full name, mailing address, birthdate, and social security number could have been exposed to an unauthorized third-party. We maintained this information on our system for standard employment, payroll, and benefits administration purposes.

As of this writing, TradeSource has not received any reports of related identity theft since the date of the incident.

What We Are Doing:

Upon detecting this incident, we moved quickly to initiate our incident response, which included conducting an investigation with the assistance of third-party forensic specialists and confirming the security of our network environment. We have reported this incident to law enforcement. We have reviewed and altered our policies and procedures relating to the security of our systems and servers, as well as our information life cycle management.

We value the safety of your personal information and are therefore offering credit monitoring and identity theft protection services through IDX. IDX’s services include: at least 12 months of credit monitoring and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

What You Can Do:

We encourage you to contact IDX with any questions and to enroll in **free credit monitoring** through IDX services by calling (833) 416-0858 or going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided above. IDX is available Monday through Friday 9 am – 9pm Eastern Time. Please note the deadline to enroll is **June 22, 2021**.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

Enclosed with this letter is additional information regarding the resources available to you, and the steps that you can take to further protect your personal information.

For More Information:

We recognize that you may have questions not addressed in this letter. If you have additional questions, please call IDX services at (833) 416-0858.

TradeSource, Inc. values the security of the personal data that we protect, and please accept my sincere apology that this incident occurred.

Sincerely,

A handwritten signature in cursive script that reads "Kevin J. Donovan".

Kevin J. Donovan  
Secretary

With enclosure.

## Additional Information

**Credit Reports:** 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.

**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:

<b>Equifax Security Freeze</b> P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 <a href="https://www.equifax.com/personal/credit-report-services/credit-freeze/">https://www.equifax.com/personal/credit-report-services/credit-freeze/</a>	<b>Experian Security Freeze</b> P.O. Box 9554 Allen, TX 75013 1-888-397-3742 <a href="http://www.experian.com/freeze/center.html">www.experian.com/freeze/center.html</a>	<b>TransUnion Security Freeze</b> P.O. Box 160 Woodlyn, PA 19094 1-800-909-8872 <a href="http://www.transunion.com/credit-freeze">www.transunion.com/credit-freeze</a>
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**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));
- TransUnion (<https://www.transunion.com/fraud-alerts>); 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 located above.

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

**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 the Attorney General.

**FTC and Attorneys General:** You can 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, the Federal Trade Commission, or your state Attorney General.

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), TTY: 1-866-653-4261. The Federal Trade Commission also

encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement. This notice has not been delayed by law enforcement.

**For Maryland residents**, the Attorney General can be contacted 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).

**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](http://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 North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and [www.ncdoj.gov](http://www.ncdoj.gov).

**For New York residents**, the Attorney General may be contacted at Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, and <https://ag.ny.gov/>.

**For Rhode Island residents**, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 02903, [www.riag.ri.gov](http://www.riag.ri.gov), and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident.