

June 9, 2021

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JUN 14 2021

CONSUMER PROTECTION

**Attorney General Gordon McDonald**  
Office of Attorney General  
33 Capitol Street  
Concord, NH 03301

**Re: Notice of a Security Incident**

Dear Attorney General McDonald,

I am writing to let you know that our client, Transplace Holdings, Inc. (“Transplace”), experienced a security incident that affected the personally identifiable information (“PII”) of some current and former employees and their beneficiaries, including 10 individuals in New Hampshire. We are providing notice to your office pursuant to N.H. Rev. Stat. § 359-C:19, *et seq.*

On February 9, 2021, Transplace observed indications of malware within its network, and immediately engaged Mandiant to perform an investigation. Mandiant reviewed the activity, removed the malware, evaluated Transplace’s systems for signs of compromise, and implemented countermeasures to further strengthen the environment. There were no indications of impact to any PII at that time.

Then, on March 7, 2021, a threat actor claimed to have downloaded files from the company’s network during the cyber attack that may have included personnel records. The impact to PII at that time was unclear; however, out of an abundance of caution, Transplace informed all current employees about the attack on March 18, 2021 (including 2 New Hampshire residents) and supplied complimentary credit monitoring. Transplace then proceeded with its ongoing investigation, led by outside experts, as well as a rigorous review of the network files implicated in the cyber attack, in order to evaluate the potential impact to PII. Given the volume of files (over 300,000), search, review, and analysis of the files took some time to complete. Transplace also reported the incident to federal law enforcement.

The company’s investigation of the incident is now complete. Transplace is not aware of any actual or attempted misuse of personal information as a result of this incident. Furthermore, searches by outside experts did not locate any of the files implicated in the attack online. However, a review of the files that were downloaded during the attack revealed some personnel records that contained names and social security numbers of current and former employees. Accordingly, after completing review of the files and identifying contact information of affected individuals, we supplied notice under operative state law to those individuals on June 8, 2021, and are also providing notice to your office as well. A copy of the notice to individuals is enclosed as Exhibit A. All individuals were offered complimentary credit monitoring and identity protection services through Experian.

Transplace has implemented additional network controls designed to improve its cyber resiliency, such as: expanding the coverage of its endpoint monitoring tool (FireEye HX); implementing "jump hosts" to restrict direct administrative login to the company's server environment; implementing multi-factor authentication for VPN access and Mimecast; replacing or rebuilding compromised or potentially compromised systems; creating an elevated account model to separate standard use accounts from administrative accounts; implementing credential harvesting counter-measures (e.g., restricting admin mode, disabling credential caching); implementing Privileged Access Management (PAM) for critical systems; implementing Local Administrator Password Solution (LAPS) in the company's server and workstation environments; performing an audit of existing service accounts; and implementing RMS (encryption) on critical internal file shares.

Please do not hesitate to let me know if you have any questions or would like additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah Glover". The signature is fluid and cursive, with the first name "Sarah" being more prominent than the last name "Glover".

Sarah Glover

Enclosure

Return Mail Processing  
PO Box 589  
Claysburg, PA 16625-0589

June 8, 2021



G5175-L0B-0000002 T00001 P001 \*\*\*\*\*AUTO\*\*MIXED AADC 159  
SAMPLE A. SAMPLE - L0B GENERAL  
APT ABC  
123 ANY ST  
ANYTOWN, ST 12345-6789



**Re: Notice of Security Incident**

Dear Sample A. Sample:

We hope this letter finds you well. We are writing to let you know about a security incident at Transplace that involved the personal information we have on file for you. We are not aware of any actual or attempted misuse of your personal information as a result of this incident. However, we want to make sure that you are aware of what happened so that you can take the appropriate precautions you feel are needed to protect your identity. We have enclosed information on several identity protection resources.

**What Happened?**

We learned on March 7, 2021 that personnel records were downloaded from our network without authorization. We have been working with law enforcement and outside experts to investigate how this happened. We are unable to confirm with available forensic evidence whether the files containing your information were actually viewed by anyone outside of our organization. Searches by our experts did **not** locate any of these files online, and we have **no** other indication that your information has been misused.

**What Information Was Available?**

Personnel records that included your name and social security number.

**What We Are Doing**

We are committed to protecting the information we maintain here at Transplace. We've installed additional security monitoring tools, implemented new processes, and will continue to focus on improving the cyber-resiliency and security posture of our company.

**What You Can Do**

The enclosed Identity Protection Reference Guide includes information on general steps you can take to monitor and protect your personal information. We are also offering one year of complimentary credit monitoring and identity protection services from Experian. Please refer to the enclosed information to subscribe to this service.



We are sorry this happened, and for the inconvenience this may cause you. If you have any questions, please reach out to our dedicated assistance team at (888) 829-6549, Monday through Friday from 8 am – 10 pm Central, or Saturday or Sunday from 10 am – 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number B013568.

Sincerely,

Transplace Human Resources

## IDENTITY PROTECTION REFERENCE GUIDE

**1. Review your Credit Reports.** We recommend that you monitor your credit reports for any activity you do not recognize. Under federal law, you are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To order your free annual credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com), call toll-free (877) 322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's ("FTC") website at [www.ftc.gov](http://www.ftc.gov) and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. The three credit bureaus provide free annual credit reports only through the website, toll-free number or request form.

If you see anything in your credit report that you do not understand, call the credit bureau at the telephone number on the report. You should notify the credit bureaus of any inaccuracies in your report, whether due to error or fraud, as soon as possible so the information can be investigated and, if found to be in error, corrected. If there are accounts or charges you did not authorize, immediately notify the appropriate credit bureau by telephone and in writing.

**2. Place Fraud Alerts.** You can place a fraud alert at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. Please note that placing a fraud alert may delay you when seeking to obtain credit. You can learn more about fraud alerts by contacting the credit bureaus or by visiting their websites:

Equifax	Experian	TransUnion
1-800-525-6285	1-888-397-3742	1-800-680-7289
P.O. Box 740241	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30374-0241	Allen, TX 75013	Chester, PA 19022-2000
<a href="http://www.equifax.com">www.equifax.com</a>	<a href="http://www.experian.com">www.experian.com</a>	<a href="http://www.transunion.com">www.transunion.com</a>

It is only necessary to contact one of these bureaus and use only one of these methods. As soon as one of the three bureaus confirms your fraud alert, the others are notified to place alerts on their records as well. You should receive confirmation letters in the mail and will then be able to order all three credit reports, free of charge, for your review.

**3. Place Security Freezes.** By placing a security freeze, someone who fraudulently acquires your personally identifying information will not be able to use that information to open new accounts or borrow money in your name. Federal and state laws prohibit charges for placing, temporarily lifting, or removing a security freeze. Keep in mind that when you place the freeze, you will not be able to borrow money, obtain instant credit, or get a new credit card until you temporarily lift or permanently remove the freeze.



To place a security freeze, you must contact each of the three national credit reporting bureaus listed above and provide the following information: (1) your full name; (2) your social security number; (3) date of birth; (4) the addresses where you have lived over the past two years; (5) proof of current address, such as a utility bill or telephone bill; (6) a copy of a government issued identification card; and (7) if you are the victim of identity theft, include the police report, investigative report, or complaint to a law enforcement agency. If the request to place a security freeze is made by toll-free telephone or secure electronic means, the credit bureaus have one business day after receiving your request to place the security freeze on your credit report. If the request is made by mail, the credit bureaus have three business days to place the security freeze on your credit report after receiving your request. The credit bureaus must send confirmation to you within five business days and provide you with information concerning the process by which you may remove or lift the security freeze.

**4. Monitor Your Account Statements.** We encourage you to carefully monitor your financial account statements, medical provider statements, and insurance statements for fraudulent activity and report anything suspicious to the respective institution or provider.

**5. You can obtain additional information** about the steps you can take to avoid identity theft and more information about fraud alerts and security freezes from the FTC. You may contact the FTC, Consumer Response Center at: 600 Pennsylvania Avenue NW, Washington, DC 20580, [www.consumer.gov/idtheft](http://www.consumer.gov/idtheft), 1-877-IDTHEFT (438-4338), TDD: 1-202-326-2502.

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**Iowa Residents:** You can report suspected identity theft to law enforcement, the FTC, or to the Office of the Attorney General of Iowa, Consumer Protection Division, Hoover State Office Building, 1305 E. Walnut Street, Des Moines, Iowa 50319-0106, 1-888-777-4590, <https://www.iowaattorneygeneral.gov/>.

**Maryland Residents:** You can obtain additional information about identity theft prevention and protection from the Maryland Attorney General, Identity Theft Unit at: 200 St. Paul Place, 25<sup>th</sup> Floor, Baltimore, MD 21202, 1-866-366-8343 or (410) 576-6491, <https://www.marylandattorneygeneral.gov>.

**Massachusetts Residents:** You have a right to file a police report and obtain a copy of your records. You can obtain additional information about identity theft prevention and protection from the Office of Consumer Affairs and Business Regulation, 501 Boylston Street, Suite 5100, Boston, MA 02116, (617) 973-8787, <https://www.mass.gov/service-details/identity-theft>.

**New York Residents:** You can obtain additional information about identity theft prevention and protection from the New York State Attorney General, The Capitol, State Street and Washington Avenue, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov/>.

**North Carolina Residents:** You can obtain additional information about preventing identity theft from the North Carolina Office of the Attorney General, Consumer Protection Division at: 9001 Mail Service Center, Raleigh, NC 27699-9001, (877) 566-7226 (toll-free within North Carolina) or (919) 716-6000, <https://ncdoj.gov/>.

**Oregon Residents:** You can report suspected identity theft to law enforcement, the FTC, or the Oregon Office of the Attorney General at: Oregon Department of Justice, 1162 Court St NE, Salem, OR 97301, 1-800-850-0228, <https://www.doj.state.or.us/>.

## DETAILS REGARDING YOUR EXPERIAN IDENTITYWORKS MEMBERSHIP

Transplace is offering you a one-year, complimentary membership for IdentityWorks<sup>SM</sup>, a product offered by Experian<sup>®</sup>, to help with detection and resolution of identity theft. To activate your membership and start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by: August 31, 2021** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/plus>
- Provide your **activation code** [REDACTED]

If you have questions about the product, need assistance with identity restoration, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian at **(888) 829-6549** by **August 31, 2021**. The call center is open Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays). Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

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 signup:** 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.
- **Internet Surveillance:** Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE<sup>TM</sup>:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance<sup>\*\*</sup>:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at **(888) 829-6549**. 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 (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 this Identity Restoration support is available to you for one year 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](http://www.ExperianIDWorks.com/restoration). You will also find self-help tips and information about identity protection at this site.

\* 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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