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CONSUMER PROTECTION

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February 28, 2022

Via Regular U.S. Mail

Consumer Protection Bureau
Office of the New Hampshire Attorney General
33 Capitol Street
Concord, NH 03301

Re: Vantage Builders, Inc. – Data Security Incident

Dear Sir or Madam:

We represent Vantage Builders, Inc. ("Vantage") located in Waltham, Massachusetts. This submission is provided pursuant to N.H. Rev. Stat. Ann. § 359-C:20(I)(b), which requires notice to your office in the event of a breach in the security of personal information affecting residents of the State of New Hampshire.

On February 22, 2022, Vantage was a victim of a data security incident. Vantage discovered the incident that same day and learned it involved unauthorized acquisition of certain Vantage employees' 2021 W-2 tax forms. Vantage immediately commenced an investigation that included partnering with cyber security incident specialists. While the investigation into the incident is ongoing, Vantage is providing impacted employees notice of the event and resources to protect against fraud or misuse of personal information. The types of personal information impacted include the employee' name and Social Security number and other sensitive information such as their address and 2021 earnings.

On or about February 28, 2022, Vantage began providing written notice of the incident via U.S. regular mail to the impacted individuals. A sample copy of the mailed written notification letter is attached as Exhibit "A", for your records. Vantage provided notification to four (4) New Hampshire residents. We note that on the evening of February 22, 2022, Vantage did provide employees whom it had contact information for, with informal email notice of the incident and access to credit monitoring.

Vantage's notification to impacted employees includes a brief description of the incident, encouragement not to wait to file 2021 tax returns, resources from the IRS on how to prevent fraudulent tax returns, encouragement to remain vigilant for incidents of fraud or misuse, and

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Office of the Attorney General
February 28, 2022
Page 2

encouragement to file a report with law enforcement, their state attorney general, and/or the Federal Trade Commission in the event that fraud or misuse is discovered. Vantage also enclosed information including instructions on how to place a fraud alert and/or security freeze, contact information for the major consumer reporting bureaus, state-specific regulator contact information, and other steps individuals may take to protect their information should they find it appropriate to do so. Vantage is offering all employees two (2) years of credit monitoring and identity restoration services at no charge from Epiq (through Experian). The services include single bureau daily credit reporting, continuous identity monitoring, account activity alerts, and \$1 Million in identity theft insurance with no deductible.

Upon discovering the incident Vantage commenced an investigation that included partnering with cyber security incident specialists to take immediate steps to mitigate the potential harm from the incident. Vantage reported the incident to the IRS, the state tax authorities, and the FBI. Vantage notified all impacted employees and is notifying other state regulators as required.

I believe this provides your office with all the information necessary for your purposes and to comply with New Hampshire law. However, if anything further is needed, please contact me directly.

Respectfully,

FREEMAN MATHIS & GARY, LLP

/s/ Nicholas Jajko

Nicholas Jajko

Exhibit “A”



204 Second Avenue
Waltham, MA 02451

February 23, 2022

VIA regular mail



Dear [REDACTED]:

At Vantage Builders, Inc. ("Vantage") we take the confidentiality, privacy, and security of employee information seriously. This communication is a follow-up to our prior communications notifying you that Vantage discovered it was a victim of a data security incident. Please read this letter carefully.

What Happened

On February 22, 2022, Vantage was a victim of a data security incident. We discovered the incident that same day and learned it involved unauthorized acquisition of certain Vantage employees' 2021 W-2 tax forms. Vantage immediately commenced an investigation that included partnering with cyber security incident specialists. While our investigation into the incident is ongoing, we are providing impacted employees notice of the event and resources to protect against fraud or misuse of personal information.

What Information Was Involved

You are receiving this notification because your name and Social Security number were visible on your W-2. Other sensitive information such as your address and 2021 earnings with Vantage was also contained on the form. While we have received no reports of misuse of information at this time, we encourage you to review and to take advantage of the resources we are offering you.

What We Are Doing

We commenced an investigation that included partnering with cyber security incident specialists to take immediate steps to mitigate the potential harm from this incident. We have reported the incident to the IRS, the state tax authorities, and the FBI. We are providing you with the attached resources to help protect your personal information. We are also reporting this to state regulators, as necessary.

What You Can Do

To safeguard your information from potential misuse, we have partnered with Epiq to provide you with two (2) years of credit monitoring and identify restoration services at no charge to you. Go to www.equifax.com/activate. Enter your unique Activation Code of [REDACTED] then click "Submit" and follow these 4 steps:

1. **Register:**

Complete the form with your contact information and click "Continue".

If you already have a myEquifax account, click the 'Sign in here' link under the "Let's get started" header.

Once you have successfully signed in, you will skip to the Checkout Page in Step 4

2. **Create Account:**

Enter your email address, create a password, and accept the terms of use.

3. **Verify Identity:**

To enroll in your product, we will ask you to complete our identity verification process.

4. **Checkout:**

Upon successful verification of your identity, you will see the Checkout Page.

Click 'Sign Me Up' to finish enrolling.

You're done!

The confirmation page shows your completed enrollment.

Click "View My Product" to access the product features.

We also encourage you to file your 2021 tax return as soon as possible, if you have not already done so. You can contact the IRS at <http://www.irs.gov/Individuals/Identity-Protection> for helpful information and guidance on steps you can take to prevent a fraudulent tax return from being filed in your name and what to do if you become the victim of such fraud. You can also visit <https://www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft> for more information. If you become aware of a fraudulent tax return filed in your name or you are instructed to do so by the IRS, you should file the IRS Form 14039, Identity Theft Affidavit, with a paper copy of the return, and mail according to the instructions. A copy of this form can be found at <https://www.irs.gov/pub/irs-pdf/f14039.pdf> or <https://www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft>.

You may also visit <https://www.irs.gov/newsroom/taxpayer-guide-to-identity-theft> to contact the IRS's Identity Protection Specialized Unit (IPSU) at 800-908-4490. IPSU employees are available to answer questions about identity theft and resolve any tax account issues that resulted from identity theft. NOTE: The IRS does not initiate contact with taxpayers by email to request personal or financial information. This includes any type of electronic communication, such as text messages and social media channels.

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

For More Information

We are very sorry for any concern or inconvenience this incident has caused or may cause you, and we encourage you to take advantage of the services being offered. If you have any other questions or concerns that you would like to discuss, please contact me directly at 781-895-3270 Ext.211.

Sincerely,

Peter Cusson

Peter Cusson
Chief Financial Officer
Vantage Builders, Inc.

ADDITIONAL STEPS TO HELP PROTECT PERSONAL INFORMATION

Review personal account statements and credit reports. We recommend that you remain vigilant by reviewing personal account statements and monitoring credit reports to detect any errors or unauthorized activity. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months. If you discover any suspicious items, you should report any incorrect information on your report to the credit reporting agency. The names and contact information for the credit reporting agencies are:

Equifax
1-888-298-0045
P.O. Box 105069
Atlanta, GA 30348
www.equifax.com

Experian
1-888-397-3742
P.O. Box 9554
Allen, TX 75013
www.experian.com

TransUnion
1-800-680-7289
P.O. Box 2000
Chester, PA 19022
www.transunion.com

Report suspected fraud. You have the right to file a police report if you ever 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 some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You should report suspected incidents of identity theft to local law enforcement, your state's Attorney General, and/or the Federal Trade Commission.

Place a Fraud Alert. Consumers have the right to place a fraud alert on their credit file at no cost. A fraud alert tells businesses that check your credit that they should check with you before opening a new account. Initial fraud alerts are for one year and identity theft victims can get an extended fraud alert for up to seven years. If you choose to place a fraud alert, we recommend you do this after activating your credit monitoring. To place a fraud alert, contact the nationwide consumer reporting agencies by phone or online using the above contact information. For more information about placing a fraud alert, please visit <https://www.consumer.ftc.gov/articles/0275-place-fraud-alert>.

Place a Security Freeze. Security freezes, also known as credit freezes, restrict access to your credit file, making it harder for identity thieves to open new accounts in your name. You can freeze and unfreeze your credit file for free. You also can get a free freeze for your children who are under 16. And if you are someone's guardian, conservator or have a valid power of attorney, you can get a free freeze for that person, too. To place a security freeze, contact the nationwide consumer reporting agencies by phone or online using the contact information above. If you request a freeze online or by phone, the agency must place the freeze within one business day. For more information, about placing a security freeze, please visit <https://www.consumer.ftc.gov/articles/0497-credit-freeze-faqs>.

Obtain additional information about the steps you can take to avoid identity theft from the following entities:

- **Rhode Island Residents:** Office of the Rhode Island Attorney General may be contacted at 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, and (401) 274-4400. There are five (5) known Rhode Island residents impacted by this incident.
- **All U.S. Residents:** The Identity Theft Clearinghouse, Federal Trade Commission may be contacted at 600 Pennsylvania Avenue, NW Washington, DC 20580, www.consumer.ftc.gov, or 1-877-IDTHEFT (438-4338).