

RECEIVED

JAN 18 2022

CONSUMER PROTECTION

NEW HAMPSHIRE  
JAN 18 2022 9:21 AM



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Suite 5600  
Seattle, WA 98104-7097  
+1 206 839 4300  
orrick.com

January 11, 2022

**By Mail**

Consumer Protection and Antitrust Bureau  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

Melanie D. Phillips

E mphillips@orrick.com  
D +1 206 839 4323  
F +1 206 839 4301

RE: Notice of Data Security Event Relating to New Hampshire Residents

Dear Attorney General Formella:

On December 9, 2021, Venafi detected a security event involving unauthorized third-party access to a single Venafi email account. Venafi immediately terminated the unauthorized access to the account. Additionally, an investigation was immediately commenced with assistance from forensics experts to determine what happened and what information was affected. Based on Venafi's investigation, a phishing email resulted in unauthorized access to a single team member's email account between November 8 and December 9, 2021. There is no evidence that any other Venafi accounts or systems were impacted. The incident does not affect and is unrelated to any Venafi products, services, or customers.

While its investigation is ongoing, Venafi has identified a total of three New Hampshire residents whose personal information was impacted. The type of information impacted varies, but may include name, personal information (such as contact or employment), Social Security number, financial account number, or financial account routing number.

Venafi began notifying New Hampshire residents on January 8, 2022 and is offering two years of free credit monitoring services provided by Experian. A sample of the individual notice is attached hereto.

Venafi has reported the event to law enforcement, enhanced its phishing controls, and reinforced its internal security training programs and plans.



January 11, 2022

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If your office requires any further information in this matter, please contact me at 206-839-4323 or [mphillips@orrick.com](mailto:mphillips@orrick.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Melanie Phillips".

Melanie Phillips  
Cybersecurity Associate  
Orrick, Herrington, & Sutcliffe, LLP



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

To Enroll, Please Visit:  
<https://www.experianidworks.com/credit>  
 Activation Code: ABCDEFGHI  
 Or Call:  
 1-833-671-0412  
 Engagement Number:

H3616-L01-0000001 T00001 P001 \*\*\*\*\*SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 GENERAL  
 APT ABC  
 123 ANY STREET  
 ANYTOWN, ST 12345-6789



January 8, 2022

**Re: Notice of Security Event**

Dear Sample A. Sample,

I'm writing to inform you of a security event that involved some of your personal information. Please read this notice carefully, as it contains information about the event, including the data impacted that belongs to you, as well as important information about the free credit monitoring and identity theft protection services Venafi is making available to you.

**What Happened?**

Venafi, Inc. ("Venafi," "we," or "our") recently identified and responded to a phishing event concerning a *single* team member that resulted in unauthorized access to that team member's email account between November 8 and December 9, 2021. It was determined that the team member's email account contained some of your personal information.

When Venafi discovered the issue, we immediately terminated the unauthorized access to the account, further enhanced our phishing controls, and reinforced our internal security training programs and plans. Venafi worked with external cybersecurity experts to investigate the event to determine what happened, what data was impacted, and to whom the data belonged. We also reported this event to law enforcement.

There is no evidence that any other Venafi accounts or systems were impacted. *The incident does not affect and is unrelated to any Venafi products, services, or customers.*

**What Information Was Involved?**

We determined that attachments containing some of your personal information were in the email account that was subject to unauthorized access, including the following: name, [Elements].

Venafi has worked with external cybersecurity experts to investigate potential avenues for misuse. At this time, Venafi has no evidence that information related to this event is being marketed on the dark web.

**What Venafi Is Doing**

Venafi is committed to safeguarding your personal information and is continually strengthening our security programs.

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We have arranged for you to receive two years of Experian's IdentityWorks, which provides you with identity detection and resolution of identity theft, including Experian credit reporting, credit monitoring, identity restoration, and identity theft insurance.

### **What You Can Do**

We recommend that you enroll in the free services from Experian by enrolling online at <https://www.experianidworks.com/credit> by following the enclosed instructions or calling Experian's customer care team at (833) 671-0412. Please be prepared to provide Engagement Number upon calling. Experian representatives are available Monday through Friday from 6 a.m. to 8 p.m. PT and Saturday through Sunday from 8:00 a.m. - 5:00 p.m. PT.

Remain alert to threats of identity theft or fraud. You can do this by regularly reviewing and monitoring your financial statements and credit reports for any unauthorized activity. If you ever suspect that you are the victim of identity theft or fraud, you should contact the company that maintains the account on your behalf or your local police.

As this incident highlights, a single click by one person can adversely affect others. Given the continuing escalation of cybersecurity attacks, be vigilant and remain alert for "phishing" emails. Avoid clicking on suspicious links. Remember that bad actors often impersonate persons or parties you know—they act like they know you or are a company that you may do business with—and will request that you click on a link so that they can gain access to your system or information.

### **For More Information**

You will find detailed instructions for enrollment on the enclosed document. Also, you will need to reference the Activation Code or Engagement Number located at the top of this letter when calling or enrolling online, so please do not discard this letter.

Sincerely,



Melissa Keohane  
Chief Legal and People Officer  
Venafi

## ADDITIONAL DETAILS FOR YOUR TWO-YEAR EXPERIAN IDENTITYWORKS MEMBERSHIP

To activate your membership and start monitoring your personal information, please follow the steps below:

- Ensure that you enroll by: **April 30, 2022** (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your activation code: **ABCDEFGHI**

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 agents are immediately available to help you address credit- and noncredit-related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$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 and would like to discuss how you may be able to resolve those issues, **please reach out to an Experian agent at (833) 671-0412**. 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 this Identity Restoration support 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, as well as self-help tips and information about identity protection, are located at [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration).

\* 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.

## ADDITIONAL INFORMATION ABOUT IDENTITY PROTECTION

To protect against possible fraud, identity theft, or other financial loss, you should always remain vigilant, review your account statements, and monitor your credit reports. Provided below are the names and contact information for the three major U.S. credit bureaus and additional information about steps you can take to obtain a free credit report and place a fraud alert or security freeze on your credit report. If you believe you are a victim of fraud or identity theft, you can contact your local law enforcement agency, your state's Attorney General, or the U.S. Federal Trade Commission ("FTC").

### INFORMATION ON OBTAINING A FREE CREDIT REPORT

U.S. residents are entitled under U.S. law to one free credit report annually from each of the three major credit bureaus. To order, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at +1 (877) 322-8228.

### INFORMATION ON IMPLEMENTING A FRAUD ALERT OR SECURITY FREEZE

You may contact the three major credit bureaus below to place a fraud alert on your credit report. A fraud alert indicates to anyone requesting your credit file that you suspect you are a possible victim of fraud. A fraud alert does not affect your ability to get a loan or credit. Instead, it alerts a business that your personal information might have been compromised and requires that business to verify your identity before issuing you credit. Although this may cause some short delay if you are the one applying for the credit, it might protect against someone else obtaining credit in your name.

In addition to a fraud alert, you may consider placing a security freeze on your credit report. A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit, mortgages, employment, housing, or other services. A credit reporting agency may not charge you to place, temporarily lift, or permanently remove a security freeze.

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To place a fraud alert on your credit report, you must contact one of the credit bureaus below and the other two credit bureaus will automatically add the fraud alert. To place a security freeze on your credit report, you must contact all three credit bureaus below:

Equifax Consumer Fraud Division P.O. Box 740256 Atlanta, GA 30374 +1 (800) 525-6285 <a href="http://www.equifax.com">www.equifax.com</a>	Experian Credit Fraud Center P.O. Box 9554 Allen, TX 75013 +1 (888) 397-3742 <a href="http://www.experian.com">www.experian.com</a>	TransUnion LLC P.O. Box 2000 Chester, PA 19016-2000 +1 (800) 680-7289 <a href="http://www.transunion.com">www.transunion.com</a>
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To request a fraud alert or 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, the addresses where you have lived over those prior five years;
5. Proof of current address such as a current utility bill or telephone bill; and
6. A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, etc.).

You may also contact the FTC for further information on fraud alerts, security freezes, and how to protect yourself from identity theft. The FTC can be contacted at 400 7th St. SW, Washington, DC 20024; telephone +1 (877) 382-4357; or [www.consumer.gov/idtheft](http://www.consumer.gov/idtheft).

### ADDITIONAL RESOURCES

Your state Attorney General may also have advice on preventing identity theft, and you should report instances of known or suspected identity theft to law enforcement, your state Attorney General, or the FTC.

**California Residents:** Visit the California Office of Privacy Protection (<https://oag.ca.gov/privacy>) for additional information on protection against identity theft.

**Iowa Residents:** Office of Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines, Iowa 50319; +1 (515) 281-5164, or [www.iowaattorneygeneral.gov](http://www.iowaattorneygeneral.gov).

**Kentucky Residents:** Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118, Frankfort, Kentucky 40601; +1 (502) 696-5300, or <https://ag.ky.gov/Pages/default.aspx>.

**Maryland Residents:** Office of Attorney General, 200 St. Paul Place, Baltimore, Maryland 21202; +1 (888) 743-0023, or [www.marylandattorneygeneral.gov](http://www.marylandattorneygeneral.gov).

**Massachusetts Residents:** Under Massachusetts law, you have the right to obtain any police report filed in connection to the 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.

**North Carolina Residents:** North Carolina Department of Justice, 9001 Mail Service Center, Raleigh, NC 27699-9001; +1 (919) 716-6400, or [www.ncdoj.gov](http://www.ncdoj.gov).

**New Mexico Residents:** You have rights under the federal Fair Credit Reporting Act ("FCRA"), which governs the collection and use of information pertaining to you by consumer reporting agencies. For more information about your rights under the FCRA, please visit [www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf](http://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf) or [www.ftc.gov](http://www.ftc.gov).

**New York Residents:** Office of the Attorney General, The Capitol, Albany, NY 12224-0341; +1 (800) 771-7755, or [www.ag.ny.gov](http://www.ag.ny.gov).

**Oregon Residents:** Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096; +1 (877) 877-9392 (toll-free in Oregon); +1 (503) 378-4400; or [www.doj.state.or.us](http://www.doj.state.or.us).

**Rhode Island Residents:** RI Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903; +1 (401) 274-4400, or [www.riag.ri.gov](http://www.riag.ri.gov). You may also file a police report by contacting local or state law enforcement agencies.