



MULLEN  
COUGHLIN<sub>LLC</sub>

STATE OF NH  
DEPT OF JUSTICE

2017 MAR -7 AM 11:36

Sian Schafle  
Office: 267-930-4799  
Fax: 267-930-4771  
Email: [sschafle@mullen.law](mailto:sschafle@mullen.law)

1275 Drummers Lane, Suite 302  
Wayne, PA 19087

March 3, 2017

**VIA U.S. MAIL**

Attorney General Joseph Foster  
Office of the New Hampshire Attorney General  
Attn: Security Breach Notification  
33 Capitol Street  
Concord, NH 03301

**Re: Notice of Data Event**

Dear Attorney General Foster:

Our office represents VT Group ("VT"), 14111 Park Meadow Drive, Suite 130, Chantilly, VA 20151. We are writing to provide you with notice of an event that may impact the security of personal information relating to eight (8) New Hampshire residents. By providing this notice, VT Group does not waive any rights or defenses regarding the applicability of New Hampshire law, applicability of the New Hampshire data event notification statute, or personal jurisdiction.

**Background**

On October 4, 2016, VT Group was informed by the FBI that its network may have been accessed by an unauthorized third party. VT immediately began an investigation to determine the scope of the potential access and to determine what, if any, data was affected. While the investigation is ongoing, VT's investigation concluded that employee personal information may have been accessible to the unknown intruder. While we are unaware of any malicious or fraudulent misuse of the information at this point, the investigation was unable to conclusively rule out unauthorized access.

While the investigation is ongoing, it has determined that employees' payroll information may have been accessed. Payroll information includes employees' name, address, Social Security number, direct deposit banking information and compensation data. This incident also may have affected any listed dependents or beneficiaries of VT Group employees.

### **Notice to New Hampshire Residents**

While the investigation is ongoing, VT Group has determined that the personal information of eight (8) New Hampshire may have been affected by this incident. On or about March 7, 2017, VT Group is mailing written notice of this incident to the individuals whose information may have been accessible, in substantially the same form as the letter attached hereto as *Exhibit A*.

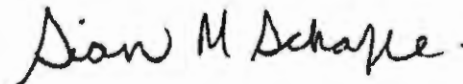
### **Other Steps Taken and To Be Taken**

VT Group takes the security of its employees' information seriously. In addition to the steps taken above, VT Group continues to work with data security experts to ensure the future security of data stored on its network. VT Group is also offering all affected individuals access to 24 months of complimentary credit monitoring and identity restoration services with Kroll, and is providing these individuals with helpful information on how to protect against identity theft and fraud. In addition to providing notice of this incident to your office, VT Group is providing notice of this incident to other regulators and consumer reporting agencies where required. VT Group is also notifying entities pursuant to contract.

### **Contact Information**

Should you have any questions regarding this notification of other aspects of this event, please contact us at 267-930-4799.

Very truly yours,



Sian Schafle of  
MULLEN COUGHLIN LLC

SS:hp  
Enclosure

# Exhibit A



STATE OF NH  
DEPT OF JUSTICE  
2017 MAR -7 AM 11:36

<<MemberFirstName>> <<MemberMiddleName>> <<MemberLastName>> <<Date>> (Format: Month Day, Year)  
<<Address1>>  
<<Address2>>  
<<City>>, <<State>> <<ZipCode>>

## Re: Notice of Data Breach

Dear <<MemberFirstName>> <<MemberLastName>>,

VT Group ("VT") is writing to alert you to an incident that may affect the security of your personal information. We have no evidence of actual unauthorized use of your personal information, however, out of an abundance of caution, we are providing this notice to ensure that you are aware of the incident so that you may take steps to protect your information should you feel it is appropriate to do so.

**What Happened?** On October 4, 2016, VT Group was notified by the FBI that its network may have been subject to access by an unknown third party. VT immediately began an investigation to determine the scope of the potential access and to determine what, if any, data was affected. While the investigation is ongoing, we have concluded that some of your personal information was accessible to the unknown intruder. While we are unaware of any malicious or fraudulent misuse of your information, we have been unable to conclusively rule out unauthorized access to the data.

**What Information Was Involved?** While our investigation is ongoing, we have evidence that your payroll information may have been accessed. Information potentially affected includes your name, address, Social Security number, and direct deposit banking information. This incident also may have affected any dependents or beneficiaries you may have listed with VT. A separate notification letter will be sent to those individuals if their information was impacted.

**What is VT Doing?** Upon being contacted by the FBI regarding the evidence of unauthorized access into our network, we engaged a network security and data privacy expert to investigate the incident and to help us take steps to better protect our network. We have worked with the FBI to coordinate our investigation with theirs and to ensure consistency of findings. We are also taking steps to increase network security within our environment and to better secure our employees' data.

In addition to the steps taken above, we are providing you with additional information on how to better protect against identity theft and fraud. We have secured the services of Kroll to provide identity monitoring at no cost to you for two (2) years. 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. More information regarding these services can be found on the enclosed Privacy Safeguards. To enroll in the services being offered to you:

- Visit [kroll.idMonitoringService.com](http://kroll.idMonitoringService.com) to activate and take advantage of your identity monitoring services.
- When you activate, you must use your unique Membership Number: <<Member ID>>
- You have until June 9, 2017 to activate your identity monitoring services.
- Additional information describing your services is included with this letter.

**What Can You Do?** You can review the additional information included in the attached Privacy Safeguards on how to better protect against identity theft and fraud. You can also enroll to receive the complimentary access to two free years of credit monitoring and identity restoration services with Kroll.

**For More Information.** We are very sorry for any inconvenience or concern this incident causes you. The security of your information is a priority to us. Should you have any questions about the content of this letter or ways you can better protect yourself from the possibility of identity theft, please call our dedicated assistance line at 1-855-656-6594 between 8:00 am and 5:00 pm CST, Monday through Friday, excluding major holidays.

We want to assure you that we continue to take appropriate actions to protect the privacy and security of your information.

Sincerely,

A handwritten signature in black ink that reads "Wm R. Willets". The signature is written in a cursive style with a large, stylized initial "W".

William R. Willets  
Vice President, Human Resources  
VT Group

## PRIVACY SAFEGUARDS

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for two (2) years. Your identity monitoring services include:

### Credit Monitoring through TransUnion

You'll receive alerts when there are changes to your credit data—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 investigator, 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 will do most of the work for you. Your investigator can dig deep to uncover all aspects of the identity theft, and then work to resolve it.

You may take action directly to protect against possible identity theft or financial loss. We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports and explanation of benefits forms for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
P.O. Box 105069	P.O. Box 2002	P.O. Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19022-2000
800-525-6285	888-397-3742	800-680-7289
<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>

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised 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. If you have been a victim of identity theft, and you provide the credit bureau with a valid police report, it cannot charge you to place, list or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files.

To find out more on how to place a security freeze, you can use the following contact information:

<b>Equifax Security Freeze</b>	<b>Experian Security Freeze</b>	<b>TransUnion</b>
P.O. Box 105788	P.O. Box 9554	PO Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19022-2000
1-800-685-1111	1-888-397-3742	1-888-909-8872
(NY residents please call 1-800-349-9960)	<a href="http://www.experian.com/freeze/center.html">www.experian.com/freeze/center.html</a>	<a href="http://www.transunion.com/securityfreeze">www.transunion.com/securityfreeze</a>
<a href="http://www.freeze.equifax.com">http://www.freeze.equifax.com</a>		

You can further educate yourself regarding identity theft, and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue, NW, Washington, DC 20580, [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft), 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC. You can also further educate yourself about placing a fraud alert or security freeze on your credit file by contacting the FTC or your state's Attorney General. **For North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, (919) 716-6400, [www.ncdoj.gov](http://www.ncdoj.gov). **For Maryland residents**, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, (888) 743-0023, [www.oag.state.md.us](http://www.oag.state.md.us). **For Rhode Island residents**, the Attorney General's office can be contacted at <http://www.riag.ri.gov/index.php>, [consumers@riag.ri.gov](mailto:consumers@riag.ri.gov) or (401) 274-4400. A total of 2 Rhode Island residents may be affected by this incident. This notification was not delayed by a law enforcement investigation.