



GRAYBILL, LANSCH & VINZANI, LLC

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March 22, 2018

Attorney General Gordan MacDonald
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

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CONSUMER PROTECTION

Re: Notification of Data Security Incident

Dear Attorney General MacDonald:

I represent West Creek Financial, Inc., a Virginia corporation (“West Creek”) and am writing to the Office of the Attorney General pursuant to N.H. Rev. Stat. Ann. § 359-C:20(I)(b) regarding a data security incident that occurred between February 1, 2018 and February 27, 2018 (the “Incident Period”).

What Happened:

During the Incident Period, West Creek was the victim of an unauthorized person or persons (the “Perpetrator”) gaining access to West Creek’s computer systems that resulted in the compromise of certain customer information, including personal and financial information. West Creek learned of the incident on February 27, 2018 and was able to shut down access and eliminate the threat by February 28, 2018. In total, the personal information of three (3) New Hampshire residents was accessed by the Perpetrator.

What Information Was Involved:

Given the nature of the breach and the unauthorized access gained, West Creek believes that the following categories of information were accessible by the Perpetrator: first and last names, dates of birth, driver’s license or government issued ID numbers, address, telephone numbers, email addresses, employer, income, and financial account information. To West Creek’s knowledge, none of the personal information potentially accessed has been used by the Perpetrator.

What West Creek is Doing in Response:

Upon becoming aware of the unauthorized access, West Creek immediately took steps to cease access, including contacting the Federal Bureau of Investigations cybercrimes unit, which has opened an investigation. West Creek is cooperating fully in that investigation.



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Moreover, West creek has notified all New Hampshire residents affected and is offering twelve months of free credit monitoring through Experian. A copy of the notification sent to the affected New Hampshire residents is attached for your records.

In order to ensure similar incidents do not occur in the future, West Creek has implemented increased and continuous monitoring of all its internal systems for access and use. West Creek is also increasing its defenses against future intrusions and further maximizing the security of its IT infrastructure and computer systems. West Creek is committed to protecting its customers' information and has undertaken to review and revise its data protections policies as well.

If you have any questions or require additional information, please contact me at the number above or email address.

Sincere Regards,

GRAYBILL, LANSCHÉ & VINZANI, LLC

A handwritten signature in black ink, appearing to read 'Jeff McMahan, Jr.', written in a cursive style.

Jeffrey D. McMahan, Jr.

Enclosure



PO Box 5518
Glen Allen, VA 23058

[Date]

[Insert Recipient's Name]
[Insert Address]
[Insert City, State, Zip]

RE: Important Security Notification
Please read this entire letter.

Dear [Insert customer name]:

West Creek values your business and respects the privacy of your information, which is why we are contacting you regarding a data security incident that has occurred between February 1 and February 27, 2018, at which point the incident was discovered. This incident involved unauthorized persons potentially having access to your name, date of birth, address, the last four digits of your social security number, driver's license or government identification card number, telephone, bank account information, debit card information, and other identifying information ("Personal Information"). As a result, your Personal Information may have been potentially exposed to others. Please be assured that we have taken every step necessary to address the incident.

Your Personal Information may have been accessed by an individual or individuals who gained unauthorized access to West Creek's records through stolen login information. Rest assured that the proper authorities and law enforcement, including the Federal Bureau of Investigations, have been contacted. If a police report has been filed in your state, you have the right to request a copy of that report. West Creek has secured its records, reset access to these accounts, validated ownership of the accounts, and taken remedial measures to stop the data security incident giving rise to this notice, as well as preventing further data security incidents in the future.

In addition, you have the right to place a security freeze on your credit report. If you have been a victim of identity theft, and you provide the credit reporting agency with a valid police report, the security freeze is free of charge. In all other cases, a credit reporting agency may charge you up to \$5.00 each to place, temporarily lift, or permanently remove a security freeze.

To place a security freeze on your credit report, you must send a written request to each of the three major consumer reporting agencies: Equifax (www.equifax.com); Experian (www.experian.com); and TransUnion (www.transunion.com) by regular, certified or overnight mail at the addresses below:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348

(888) 766-0008

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
(888) 397-3742

TransUnion Security Freeze
Fraud Victim Assistance Department
P.O. Box 2000
Chester, PA 19022-2000
(888) 909-8872

In order to request a 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, provide the addresses where you have lived over the prior five years;
- 5) Proof of current address such as a current utility bill or telephone bill;
- 6) A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.);
- 7) If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft; and
- 8) If you are not a victim of identity theft, include payment by check, money order, or credit card (Visa, MasterCard, American Express or Discover only). Do not send cash through the mail.

West Creek values your privacy and deeply regrets that this incident occurred. West Creek is conducting a thorough review of the potentially affected records, including cooperating with the FBI to discover the identity of and, if warranted, prosecution of, the individuals responsible for this incident. West Creek has implemented additional security measures designed to protect your privacy and to allow you to monitor and take an active role in protecting your personal information. Specifically, West Creek has partnered with Experian to offer twelve (12) months of Experian's IdentityWorks program at no cost to you. It is important for West Creek and yourself to remain vigilant in protecting against fraud and identity theft, so please review account statements, utilize free credit reports, and take advantage of Experian's IdentityWorks program.

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. 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 offer 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. You will also find self-help tips and information about identity protection at this site.

While Identity Restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorksSM as a complimentary one-year membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: [date]** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: **[URL]**
- Provide your **activation code: [code]**

If you have questions about the product, need assistance with identity restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-890-9332 by **[enrollment end date]**. Be prepared to provide engagement number **[engagement number]** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

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, Equifax and Transunion files 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™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information.

We sincerely apologize for this incident and regret any inconvenience it may cause you. Should you have questions or concerns regarding this matter, please do not hesitate to contact us at 844-937-8275.

Sincerely,

[Signed by appropriate executive - president, CEO or VP HR]

* Offline members will be eligible to call for additional reports quarterly after enrolling

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions