



December 14, 2023

VIA ELECTRONIC MAIL

Attorney General John Formella
Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301
Email: DOJ-CPB@doj.nh.gov

Re: Notice of Data Security Incident

Dear Attorney General Formella:

Constangy, Brooks, Smith & Prophete, LLP represents Wianno Club, a historic club located in Osterville, Massachusetts, in connection with a recent data security incident described in greater detail below. The purpose of this letter is to notify you of the incident in accordance with New Hampshire's data breach notification statute.

Nature of the Security Incident

On or around May 26, 2023, Wianno Club experienced a network disruption in its digital environment. In response, Wianno Club immediately took steps to secure the environment and launched an investigation with the assistance of a leading computer forensics firm to determine what happened and whether sensitive or personal information may have been accessed or acquired during the incident. As a result of the investigation, Wianno Club identified that a limited amount of data may have been accessed or acquired without authorization. Wianno Club then engaged an independent team to conduct a comprehensive review of all potentially affected data, and on October 13, 2023, that review determined that the personal information of certain Wianno Club employees and members was potentially affected. Wianno Club then worked diligently to identify contact information to effectuate notification to these individuals, which was completed on December 4, 2023.

The information affected varied between individuals but may have included

. Please note that we have no current evidence to suggest misuse or attempted misuse of personal information involved in the incident.

Number of New Hampshire Residents Involved

On December 14, 2023, Wianno Club notified thirteen (13) New Hampshire residents of this data security incident via U.S. First-Class Mail. A sample copy of the notification letter sent to the impacted individuals is included with this correspondence.

Steps Taken to Address the Incident

In response to the incident, Wianno Club is providing individuals with information about steps that they can take to help protect their personal information, and, out of an abundance of caution, it is also offering individuals complimentary credit monitoring and identity protection services through IDX. Additionally, to help reduce the risk of a similar future incident, Wianno Club has implemented additional technical security measures throughout the environment.

Contact Information

Wianno Club remains dedicated to protecting the information in its control. If you have any questions or need additional information, please do not hesitate to contact me at

Sincerely,

Laura K. Funk
Partner
CONSTANGY, BROOKS, SMITH & PROPHETE,
LLP

Enclosure: Sample Notification Letter



Return to IDX
4145 SW Watson Ave
Suite 400
Beaverton, OR 97005

<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

December 14, 2023

Re: Notice of Data <<Variable Text 1 – Subject Line>>

Dear <<First Name>> <<Last Name>>,

We are writing to inform you of a recent data security incident experienced by Wianno Club that may have involved your personal information. At Wianno Club, we take the privacy and security of all information within our possession very seriously. This is why we are notifying you of the incident, providing you with steps you can take to help protect your personal information, and offering you the opportunity to enroll in complimentary credit monitoring and identity protection services.

What Happened. On or around May 26, 2023, Wianno Club experienced a network disruption in its digital environment. We immediately took steps to secure the environment and launched an investigation with the assistance of a leading computer forensics firm to determine what happened and whether sensitive or personal information may have been accessed or acquired during the incident. As a result of the investigation, we identified that a limited amount of data may have been accessed or acquired without authorization. Wianno Club then engaged an independent team to conduct a comprehensive review of all potentially affected data, and on October 13, 2023, that review determined that the personal information of certain Wianno Club employees and members was potentially affected. We then worked diligently to identify contact information to effectuate notification to these individuals, which was completed on December 4, 2023.

What Information Was Involved. The information involved may have included , <<Variable Text – Data Elements>>. **Please note that we have no current evidence to suggest the misuse or attempted misuse of the personal information.** Nonetheless, out of an abundance of caution, we are notifying you of this incident and offering resources to help you protect your personal information.

What We Are Doing. As soon as Wianno Club learned of the incident, we took the measures described above and implemented additional security features to reduce the risk of a similar incident occurring in the future. We have also communicated with the Federal Bureau of Investigation and the Department of Homeland Security regarding the incident and will cooperate with any investigations they may conduct. We are also providing you with information about steps you can take to help protect your personal information.

Additionally, we are offering you the opportunity to enroll in credit monitoring and identity protection services through IDX by ZeroFox at no cost to you. The IDX services, which are free to you upon enrollment, include <<12/24>> months of credit and CyberScan dark web monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

What You Can Do. Please review this letter carefully, along with the guidance included with this letter about additional steps you can take to protect your information. In addition, we encourage you to enroll in the credit monitoring and identity theft protection services we are offering through IDX at no cost to you. To receive credit monitoring services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

You can enroll in the IDX identity protection services by calling 1-833-903-3648 or going to <https://app.idx.us/account-creation/protect> or scanning the QR image and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 9:00 a.m. to 9:00 p.m. Eastern Time. Please note the deadline to enroll is March 14, 2024.

For More Information. If you have questions about the incident, please call IDX at 1-833-903-3648, Monday through Friday from 9:00 a.m. to 9:00 p.m. Eastern Time. IDX representatives are fully versed on this incident and can answer questions you may have regarding the protection of your personal information.

Please accept our sincere apologies and know that we deeply regret any concern or inconvenience that this may cause you.

Sincerely,

Wianno Club
107 Sea View Ave
Osterville, MA 02655

ADDITIONAL STEPS YOU CAN TAKE TO FURTHER PROTECT YOUR INFORMATION

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and monitoring free credit reports closely for errors and by taking other steps appropriate to protect accounts, including promptly changing passwords. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained for remediation assistance or contact a remediation service provider. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC). You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Ave, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.consumer.ftc.gov, www.ftc.gov/idtheft.

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print this form at <https://www.annualcreditreport.com/cra/requestformfinal.pdf>. You also can contact one of the following three national credit reporting agencies:

- *Equifax*, P.O. Box 740241, Atlanta, GA 30374, 1-800-525-6285, www.equifax.com.
- *Experian*, P.O. Box 9532, Allen, TX 75013, 1-888-397-3742, www.experian.com.
- *TransUnion*, P.O. Box 1000, Chester, PA 19016, 1-800-916-8800, www.transunion.com.

Fraud Alerts: There are two kinds of general fraud alerts you can place on your credit report—an initial alert and an extended alert. You may want to consider placing either or both fraud alerts on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. You may have an extended alert placed on your credit report if you have already been a victim of identity theft and provide the appropriate documentary proof. An extended fraud alert is also free and will stay on your credit report for seven years. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>. Military members may also place an Active-Duty Military Fraud Alert on their credit reports while deployed. An Active-Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment.

Credit or Security Freezes: Under U.S. law, you have the right to put a credit freeze, also known as a security freeze, on your credit file, for up to one year at no cost. The freeze will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit.

You must separately place a security freeze on your credit file with each credit reporting agency. There is no fee to place or lift a security freeze. For information and instructions on how to place a security freeze, contact any of the credit reporting agencies or the Federal Trade Commission identified above. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement. After receiving your freeze request, each credit bureau will provide you with a unique PIN or password. Keep the PIN or password in a safe place as you will need it if you choose to lift the freeze.

A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or via phone, a credit bureau must lift the credit freeze within an hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after receiving your request.

IRS Identity Protection PIN: You can obtain an identity protection PIN (IP PIN) from the IRS that prevents someone else from filing a tax return using your Social Security number. The IP PIN is known only to you and the IRS and helps the IRS verify your identity when you file your electronic or paper tax return. You can learn more and obtain your IP PIN here: <https://www.irs.gov/identity-theft-fraud-scams/get-an-identity-protection-pin>.

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include the right to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, and your rights pursuant to the FCRA, please visit http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state attorney general about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the attorney general in your state.

Additional information:

District of Columbia: The Office of the Attorney General for the District of Columbia can be reached at 400 6th Street, NW, Washington, DC 20001; 202-727-3400; oag@dc.gov

California: California Attorney General can be reached at: 1300 "I" Street, Sacramento, CA 95814-2919; 800-952-5225; <http://oag.ca.gov/>

Massachusetts: Massachusetts Attorney General can be reached at: 1 Ashburton PI Boston, MA 02108; 617-727-8400; <https://www.mass.gov/orgs/office-of-the-attorney-general>

Maine: Maine Attorney General can be reached at: 6 State House Station Augusta, ME 04333; 207-626-8800; <https://www.maine.gov/ag/>

Maryland: Maryland Attorney General can be reached at: 200 St. Paul Place Baltimore, MD 21202; 888-743-0023; oag@state.md.us or IDTheft@oag.state.md.us

North Carolina: North Carolina Attorney General's Office, Consumer Protection Division, can be reached at: 9001 Mail Service Center Raleigh, NC 27699-9001; 877-5-NO-SCAM (Toll-free within North Carolina); 919-716-6000; www.ncdoj.gov

New York: New York Attorney General can be reached at: Bureau of Internet and Technology Resources, 28 Liberty Street, New York, NY 10005; 212-416-8433; <https://ag.ny.gov/>

Rhode Island: Rhode Island Attorney General can be reached at: 150 South Main Street Providence, RI 02903, <http://www.riag.ri.gov>

Texas: Texas Attorney General can be reached at: 300 W. 15th Street, Austin, Texas 78701; 800-621-0508; texasattorneygeneral.gov/consumer-protection/

Vermont: Vermont Attorney General's Office can be reached at: 109 State Street, Montpelier, VT 05609; 802-828-3171; ago.info@vermont.gov