

**WILSON  
SONSINI**

RECEIVED

Wilson Sonsini Goodrich & Rosati  
Professional Corporation

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ALLISON J. BENDER  
Email: [ajbender@wsgr.com](mailto:ajbender@wsgr.com)  
Direct dial: 202-791-8028

June 9, 2021

**VIA FEDEX**

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

Re: Notice of Data Security Incident

Dear Attorney General MacDonald,

I write on behalf of my client, WideOrbit LLC, located at 1160 Battery Street, Suite 300, San Francisco, CA 94111 ("WideOrbit"), to inform you of a recent event that may affect the security of personal information of two New Hampshire residents, who are current employees of WideOrbit.

WideOrbit discovered a data security incident affecting an email account of one of its employees. Upon discovery of this security incident, WideOrbit engaged third-party cybersecurity experts to aid in its investigation, and worked to safely restore systems in a manner that protected the security of information on its systems. WideOrbit sells advertising management software for media companies. WideOrbit contacted the FBI and will cooperate in any law enforcement investigation.

WideOrbit's investigation identified evidence of unauthorized activity in the employee's email account, including potentially unauthorized acquisition of emails and email attachments containing sensitive personal information. While the investigation is ongoing, WideOrbit does not know if sensitive personal information about the New Hampshire residents contained in these emails and email attachments was in fact accessed.

On or about June 10, 2021, pursuant to N.H. Rev. Stat. Ann. § 359-C:20, WideOrbit will begin mailing notification letters, in the same or substantially similar form as enclosed herein, to New Hampshire residents, which will include an offer of complimentary credit monitoring and fraud protection services for a period of twelve months.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

A handwritten signature in cursive script that reads "Allison J. Bender". The signature is written in black ink and is positioned above the printed name.

Allison J. Bender

Enclosure

# WIDEORBIT

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

To Enroll, Please Call:

(866) 362-1769

Or Visit:

<https://www.experianidworks.com/credit>

Activation Code: ABCDEFGHI

Engagement # ENGAGE#



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SAMPLE A. SAMPLE - L03

APT ABC

123 ANY ST

ANYTOWN, ST 12345-6789



June 10, 2021

## Notice of Data Breach

Dear Sample A. Sample:

### What Happened

This letter is to inform you that WideOrbit LLC ("WideOrbit") discovered a data security incident affecting an email account of one of our employees. Upon discovery of this incident, we engaged third-party cybersecurity experts to aid in our investigation. We also informed law enforcement and will cooperate in any investigation they may pursue. Our investigation to-date identified evidence that, on July 1, 2020, an employee clicked on an attachment in a phishing email, which resulted in unauthorized activity to that employee's email account by an unknown third party who may have been able to access that mailbox from approximately July 1, 2020 to approximately November 26, 2020. We have determined that the mailbox contained information about you during that time period; however, we have not been able to determine whether that information about you was actually viewed, accessed or acquired by the unknown third party.

### What Information Was Involved

The information contained in this employee's mailbox included personal information regarding current and former employees of WideOrbit, current and former contractors, and current and former employees' spouses and dependents.

The information about you contained in the mailbox includes the following:

- Contact information, such as your name, email address, and mailing address
- [EXTRA2]
- [EXTRA3]
- [EXTRA4]
- [EXTRA5]
- [EXTRA6]
- [EXTRA7]
- [EXTRA8]

0000003



Say hello to a Wider World™

G5264-L03

## What We Are Doing

We take the security of our personnel data very seriously. We are taking steps to investigate this incident and enhance our security program to help prevent similar incidents from happening in the future, including providing additional training to our workforce around phishing campaigns and security best practices, reviewing and updating our data retention and handling practices, and considering additional tools and software to further harden our environment.

In addition, we are offering identity theft protection services through Experian, a data breach and recovery services expert. Experian's IdentityWorks™ is available at no cost to you for [EXTRA1].

Experian IdentityWorks™ can help you protect your identity in the following ways:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.<sup>1</sup>
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents 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.
- **Up to \$1 Million Identity Theft Insurance<sup>2</sup>:** Provides coverage for certain costs and unauthorized electronic fund transfers.

## What You Can Do

We encourage you to contact Experian with any questions and to enroll in free identity protection services by calling (866) 362-1769 or going to <https://www.experianidworks.com/credit> and using the Activation Code provided above. Experian representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information. Experian representatives are available Monday through Friday from 6am to 8pm Pacific Time and Saturday and Sunday from 8am to 5pm Pacific Time. Please note the deadline to enroll is August 11, 2021. We encourage you to take full advantage of this service offering. Please also review the enclosed attachment for additional steps you may take.

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<sup>1</sup> Offline members will be eligible to call for additional reports quarterly after enrolling.

<sup>2</sup> 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.

## For More Information

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

Please call (866) 362-1769 for assistance or for any additional questions you may have. Be prepared to provide engagement number ENGAGE# as proof of eligibility for the identity restoration services by Experian.

Sincerely,

HR at WideOrbit LLC

Ph: 415-675-6700

1160 Battery Street  
Suite 300  
San Francisco, CA 94111

(Enclosure)

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G5264-L03

## Recommended Steps to help Protect your Information

**1. Website and Enrollment.** Go to <https://www.experianidworks.com/credit> and follow the instructions for enrollment using your Activation Code provided at the top of the letter.

**2. Activate the credit monitoring** provided as part of your Experian identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, Experian will be able to assist you.

**3. Telephone.** Contact Experian at (866) 362-1769 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity. Be prepared to provide engagement number ENGAGE# as proof of eligibility for the identity restoration services by Experian.

**4. Review your credit reports.** We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. 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](http://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 and have enrolled in Experian identity protection, notify them immediately by calling or by logging into the Experian website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our customer care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an Experian Restoration agent who will work on your behalf to identify, stop and reverse the damage quickly.

You should also know that 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 can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

**5. Place Fraud Alerts** with the three credit bureaus. If you choose to place a fraud alert, we recommend you do this after activating your credit monitoring. You can place a fraud alert at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. The contact information for all three bureaus is as follows:

Equifax Fraud Reporting  
1-866-349-5191  
P.O. Box 105069  
Atlanta, GA 30348-5069  
[www.equifax.com](http://www.equifax.com)

Experian Fraud Reporting  
1-888-397-3742  
P.O. Box 9554  
Allen, TX 75013  
[www.experian.com](http://www.experian.com)

TransUnion Fraud Reporting  
1-800-680-7289  
P.O. Box 2000  
Chester, PA 19022-2000  
[www.transunion.com](http://www.transunion.com)

It is necessary to contact only ONE of these bureaus and use only ONE of these methods. As soon as one of the three bureaus confirms your fraud alert, the others are notified to place alerts on their records as well. You will receive confirmation letters in the mail and will then be able to order all three credit reports, free of charge, for your review. An initial fraud alert will last for one year.

**Please Note: No one is allowed to place a fraud alert on your credit report except you.**

**6. Security Freeze.** By placing a security freeze, someone who fraudulently acquires your personal identifying information will not be able to use that information to open new accounts or borrow money in your name. You will need to contact the three national credit reporting bureaus listed above to place the freeze. Keep in mind that when you place the freeze, you will not be able to borrow money, obtain instant credit, or get a new credit card until you temporarily lift or permanently remove the freeze. There is no cost to freeze or unfreeze your credit files.

**7. You can obtain additional information** about the steps you can take to avoid identity theft from the following agencies. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them.

**California Residents:** Visit the California Office of Privacy Protection ([www.oag.ca.gov/privacy](http://www.oag.ca.gov/privacy)) for additional information on protection against identity theft.

**Iowa Residents:** You may contact law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity theft. This office can be reached at: Office of the Attorney General of Iowa Hoover State Office Building 1305 E. Walnut Street Des Moines, IA 50319, (515) 281-5164, [www.iowaattorneygeneral.gov](http://www.iowaattorneygeneral.gov).

**Oregon Residents:** Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, [www.doj.state.or.us/](http://www.doj.state.or.us/), Telephone: 877-877-9392

**All US Residents:** Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, [www.consumer.gov/idtheft](http://www.consumer.gov/idtheft), 1-877-IDTHEFT (438-4338), TTY: 1-866-653-4261.



FOR THE  
STATE OF  
NEW YORK

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