



STATE OF NH
DEPT OF JUSTICE
2020 NOV 20 AM 10:05

ATTORNEYS AT LAW
321 NORTH CLARK STREET
CHICAGO, IL 60654-5313
312.832.4500 TEL
312.832.4700 FAX
WWW.FOLEY.COM

atantleff@foley.com
312.832.4367

CLIENT/MATTER NUMBER
123172-0110

November 19, 2020

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

Re: Notification Pursuant to N.H. Rev. Stat. § 359-C:19 *et seq.*

Dear Attorney General MacDonald:

We are writing on behalf of our client, WillScot Mobile Mini Holdings Corp. (“WillScot”), to notify you of a breach of security involving the personal information of twenty-three (23) New Hampshire residents.

NATURE OF THE UNAUTHORIZED DISCLOSURE

On November 10, 2020, WillScot discovered, on that same day, that its Human Resources Department inadvertently attached a spreadsheet containing sensitive employee information relating to the benefits open enrollment process for the company. This email was sent to Mobile Mini managers. WillScot deleted all copies of the email and related attachments from recipients’ inboxes and computers within minutes of the message being delivered.

Based on its investigation, WillScot has no evidence to suggest that any sensitive employee information was accessed or used without authorization or for an improper purpose. The information involved in this incident includes employees’ full names, home addresses, dates of birth, Social Security numbers, and Member IDs associated with their health insurance.

STEPS WE ARE TAKING RELATED TO THE INCIDENT

WillScot will mail a notification to the potentially affected New Hampshire residents on November 20, 2020. Enclosed is a sample copy of the notice that will be sent to those individuals.

Out of an abundance of caution, WillScot will provide the potentially affected New Hampshire residents with credit monitoring and identity protection services through Experian, at no charge for a period of twenty-four (24) months, and will also set up a dedicated support line that will be staffed to answer any questions individuals may have about this incident or the services available to them.

In response to this incident, WillScot is retraining its workforce on email security best practices and investigating other software solutions to help avoid an event like this from happening in the future.

BOSTON
BRUSSELS
CHICAGO
DETROIT

JACKSONVILLE
LOS ANGELES
MADISON
MIAMI

MILWAUKEE
NEW YORK
ORLANDO
SACRAMENTO

SAN DIEGO
SAN FRANCISCO
SILICON VALLEY
TALLAHASSEE

TAMPA
TOKYO
WASHINGTON, D.C.

November 19, 2020
Page 2

If you have any further inquiries concerning this notification, please do not hesitate to contact me.

Sincerely

A handwritten signature in blue ink, consisting of a large, stylized initial 'A' followed by a long horizontal stroke.

Aaron K. Tantleff
Foley & Lardner LLP

Encl: Sample Notification Letter



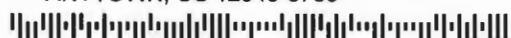
Return Mail Processing
 PO Box 589
 Claysburg, PA 16625-0589

November 20, 2020

F9851-L01-0000001 P003 T00017 *****ALL FOR AADC 123



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



NOTICE OF DATA BREACH

Dear Sample A Sample:

At WillScot Mobile Mini Holdings Corp. (“WillScot”), we value and respect the privacy of your information, which is why, as a precautionary measure, we are writing to inform you of a recent security incident that may have involved your personal information and share some steps that you can take to help protect yourself.

WHAT HAPPENED?

On November 10, 2020, we discovered, on that same day, that our Human Resources Department inadvertently attached a spreadsheet containing sensitive employee information relating to the benefits open enrollment process for the company. This email was sent to Mobile Mini managers. We deleted all copies of the email and related attachments from recipients’ inboxes and computers within minutes of the message being delivered. Based on our investigation, we have no evidence to suggest that any sensitive employee information was accessed or used without authorization or for an improper purpose.

WHAT INFORMATION WAS INVOLVED?

The information involved in this incident includes your full name, home address, date of birth, Social Security number, and the Member ID associated with your health insurance.

WHAT WE ARE DOING

In response to this incident, we are retraining our workforce on email security best practices and are investigating other software solutions to potentially help us avoid an event like this from happening in the future. Although we have no evidence of actual misuse of any of your information, we are notifying you out of an abundance of caution. To help relieve concerns and restore confidence following this incident, we have arranged for you to enroll, at no cost to you, in credit monitoring and identity protection services for two (2) years through Experian®. You may sign up for these services by following the instructions in the “What You Can Do” section below.

WHAT YOU CAN DO

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 (866) 888-6339. 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 Identity Restoration support is available to you for two (2) years 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.

0000001



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 two-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: 02/28/2021** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code: XXXXXXXXX**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (866) 888-6339 by 02/28/2021. Be prepared to provide engagement number, [REDACTED], as proof of eligibility for the identity restoration services by Experian.

Additional details regarding your 24-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. (*Offline members will be eligible to call for additional reports quarterly after enrolling.)
- **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****: Provides coverage for certain costs and unauthorized electronic fund transfers. (**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.)

Please also review the enclosed "Other Important Information" document included with this letter for further steps you can take to protect your information, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file. It is also recommended that you remain vigilant for incidents of fraud and identity theft by reviewing your account statements and monitoring your credit reports for unauthorized activity. If you discover any suspicious or unusual activity on your accounts, you should promptly notify the financial institution or company with which your account is maintained.

FOR MORE INFORMATION

For further information and assistance, please call our dedicated incident response line at (866) 888-6339 between 6:00 a.m. – 8:00 p.m. Pacific Time (Monday through Friday) and 8:00 am - 5:00 pm Pacific Time (Saturday and Sunday).

Sincerely,



Hezron Lopez
Chief Human Resources Officer
WillScot Mobile Mini Holdings Corp.

OTHER IMPORTANT INFORMATION

Contact information for the three nationwide credit reporting agencies:

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111

Experian, PO Box 2104, Allen, TX 75013, www.experian.com, 1-888-397-3742

TransUnion, PO Box 2000, Chester, PA 19022, www.transunion.com, 1-800-888-4213

Free Credit Report. We recommend that you remain vigilant for incidents of fraud and identity theft by reviewing your account statements and monitoring your credit reports for unauthorized activity. If you discover any suspicious or unusual activity on your accounts, you should promptly notify the financial institution or company with which your account is maintained. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting agencies. To order your annual free credit report please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's (FTC) website at www.consumer.ftc.gov) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

Fraud Alert. You have the right to place an initial or extended "fraud alert" on your file at no cost by contacting any of the three nationwide credit reporting agencies identified above. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert displayed on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. If you are a victim of identity theft and have filed an identity theft report with law enforcement, you may want to consider placing an extended fraud alert, which lasts for 7 years, on your credit file.

Security Freeze. You have the right to place, lift, or remove a "security freeze" on your credit report, free of charge. 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. Under federal law, you cannot be charged to place, lift, or remove a security freeze.

You must place your request for a freeze with each of the three (3) major consumer reporting agencies listed above. To place a security freeze on your credit report, you may send a written request by regular, certified or overnight mail at the addresses below. You may also place a security freeze through each of the consumer reporting agencies' websites or over the phone, using the contact information above and below:

Equifax Security Freeze
1-800-349-9960

<https://www.equifax.com/personal/credit-report-services/>

Experian Security Freeze
1-888-397-3742

<https://www.experian.com/freeze/center.html>

TransUnion Security Freeze
1-888-909-8872

<https://www.transunion.com/credit-freeze>

In order to request a security freeze, you will need to provide some or all of the following information to the credit reporting agency, depending on whether you do so online, by phone, or by mail (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. 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.

The credit reporting agencies have one (1) business day after receiving your request by toll-free telephone or secure electronic means, or up to three (3) business days after receiving your request by mail, to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with a unique personal identification number (PIN) or password (or both) that can be used by you to authorize the removal or lifting of the security freeze. It is important to maintain this PIN/password in a secure place, as you will need it to lift or remove the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, or to lift a security freeze for a specified period of time, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to the credit reporting agencies and include proper identification (name, address, and Social Security number) and the PIN or password provided to you when you placed the security freeze as well as the identity of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have one (1) business day after receiving your request by toll-free telephone or secure electronic means, or three (3) business days after receiving your request by mail, to lift the security freeze for those identified entities or for the specified period of time.

0000001



To remove the security freeze, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to each of the three (3) credit bureaus and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have one (1) business day after receiving your request by toll-free telephone or secure electronic means, or three (3) business days after receiving your request by mail, to remove the security freeze.

Federal Trade Commission and State Attorneys General Offices. If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the FTC, proper law enforcement authorities and/or your state attorney general. You may also contact these agencies for information on how to prevent or avoid identity theft and to obtain additional information about fraud alerts and security freezes. You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (438-4338).

- **For California Residents:** You may also wish to review the information provided by the California Attorney General at <https://oag.ca.gov/idtheft>.
- **For Iowa Residents:** You are advised to report suspected incidents of identity theft to law enforcement or the Iowa Attorney General's Office at Office of the Attorney General of Iowa, Consumer Protection Division, Hoover State Office Building, 1305 East Walnut Street, Des Moines, IA 50319, www.iowaattorneygeneral.gov. Telephone: 1- 515-281-5926 or 1-888-777-4590.
- **For Maryland Residents:** You may obtain information about avoiding identity theft from the Maryland Attorney General's Office: Office of the Attorney General of Maryland, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, <https://www.marylandattorneygeneral.gov/Pages/IdentityTheft/default.aspx>. Telephone: 1-410-576-6491 or 1-888-743-0023.
- **For New Mexico Residents:** You have rights pursuant to the Fair Credit Reporting Act ("FCRA"), such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the FCRA, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the FCRA not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the FCRA. We encourage you to review your rights pursuant to the FCRA by visiting www.consumerfinance.gov/f/201504_cfbp_summary_your-rights-under-fcra.pdf, or by writing Consumer Response 30-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.
- **For New York Residents:** You may obtain additional information about security breach response and identity theft prevention and protection from the New York State Office of the Attorney General at <https://ag.ny.gov/> or by calling 1-800-771-7755; the New York State Police at <http://troopers.ny.gov/> or by calling 1-518-457-6721; and/or the New York Department of State at <https://www.dos.ny.gov> or by calling 1-800-697-1220.
- **For North Carolina Residents:** You may obtain additional information about preventing identity theft provided by the North Carolina Attorney General at <https://ncdoj.gov/protecting-consumers/identity-theft/>, by calling 1-877- 566-7226, or writing to 9001 Mail Service Center, Raleigh, NC 27699.
- **For Oregon Residents:** You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General at <https://doj.state.or.us>, by calling (877) 877-9392, or writing to Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096.
- **For Rhode Island Residents:** You have the right to file and obtain a copy of any police report. You also have the right to request a security freeze as described above. You may contact the Rhode Island Attorney General at <http://www.riag.ri.gov>, by calling 401-274-4400, or by writing to 150 South Main Street, Providence RI 02903. There is one Rhode Island resident potentially impacted by this incident.