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ATTORNEYS AT LAW

RECEIVED
JUN 17 2019
CONSUMER PROTECTION

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June 11, 2019

VIA U.S. MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Attorney General Gordon J. MacDonald:

We represent The Winebow Group, LLC (“Winebow”) located at 4800 Cox Road, Suite 300, Glen Allen, VA 23060, and are writing to notify your office of an incident that may affect the security of some personal information relating to one (1) New Hampshire resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Winebow does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

On or about On February 22, 2019, Winebow became aware of suspicious activity on certain Winebow servers. Winebow immediately launched an investigation which included working with leading third-party forensic investigation firms to determine the nature and scope of the incident. On March 19, 2019, the investigation confirmed that unauthorized access to Winebow’s network as well as one employee email account. Winebow immediately began a thorough manual and programmatic process to determine what sensitive data may have been accessible due to this event. On April 26, 2019, Winebow confirmed the identities of the individuals with information within the accessible folders and the email account as a result of the incident. The information that could have been subject to unauthorized access includes name, address, and Social Security number. The unauthorized access occurred between January 4, 2019 and March 18, 2019.

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Notice to New Hampshire Resident

On or about June 11, 2019, Winebow provided written notice of this incident to all affected individuals, which includes one (1) New Hampshire resident. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

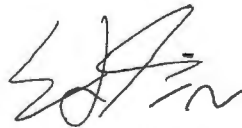
Upon discovering the event, Winebow moved quickly to investigate and respond to the incident, assess the security of Winebow systems, and notify potentially affected individuals. Winebow is also working to implement additional safeguards and training to its employees. Winebow is providing access to credit monitoring services for 24 months, through Kroll, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Winebow is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Winebow is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4776.

Very truly yours,



Edward J. Finn of
MULLEN COUGHLIN LLC

EXHIBIT A



<<Date>> (Format: Month Day, Year)

<<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

Notice of Data Breach

Dear <<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>,

The Winebow Group, LLC (“Winebow”) recently discovered an incident that may affect the security of some of your personal information. We write to provide you with information on the incident, steps Winebow is taking in response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it is appropriate.

What Happened? On February 22, 2019, Winebow became aware of suspicious activity on certain Winebow servers. We immediately launched an investigation, which included working with leading third-party forensic investigation firms, to determine the nature and scope of the event. The investigation confirmed unauthorized access to certain files on Winebow’s network as well as one employee email account. We immediately began a thorough manual and programmatic process to determine what sensitive data may have been accessible due to this event. On April 26, 2019, we confirmed the identities of the individuals who may have had information accessible as a result of the incident. The unauthorized access occurred beginning on January 4, 2019 until March 18, 2019.

What Information Was Involved? We confirmed that your <<ClientDef1(Breach Details Variable Text)>> were contained within the affected folders and email account accessed by the unauthorized actor.

What We Are Doing. Information privacy and security are among our highest priorities. Winebow has strict security measures in place to protect information in our care. Upon learning of this incident, we quickly took steps to confirm the security of our systems. We reset passwords for all relevant Winebow accounts and systems and are reviewing our policies and procedures relating to data security.

In an abundance of caution, we are notifying potentially affected individuals, including you, so that you may take further steps to best protect your personal information, should you feel it is appropriate to do so. We have arranged to have Kroll provide identity monitoring services for 24 months at no cost to you as an added precaution. We are also reporting this event to relevant state regulators.

What You Can Do. Please review the enclosed “Steps You Can Take to Protect Your Information” to learn more about ways to protect personal information. You may also activate the free Credit Monitoring, Fraud Consultation, and Identity Theft Restoration services we are offering.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please contact 1-866-775-4209 (toll free) Monday through Friday, 8:00 a.m. to 5:30 p.m. Central Time.

Winebow takes the privacy and security of personal information seriously. We sincerely regret any inconvenience or concern this incident has caused you.

Sincerely,

Mike Levine,
Sr. Vice President, Chief Information Officer

Steps You Can Take to Protect Your Information

Enroll in Credit Monitoring

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 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.

Visit krollbreach.idMonitoringService.com to activate and take advantage of your identity monitoring services.

You have until **September 8, 2019** to activate your identity monitoring services.

Membership Number: <<Member ID>>

To receive credit services by mail instead of online, please call 1-844-263-8605. Additional information describing your services is included with this letter.

Monitor Your Accounts.

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements and explanation of benefits, and to monitor your credit reports for suspicious activity and to detect error over the next 12 to 24 months. 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 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.

You have the right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian

PO Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion

P.O. Box 2000
Chester, PA 19016
1-800-909-8872
www.transunion.com/credit-freeze

Equifax

PO Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
www.equifax.com/personal/credit-report-services

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Experian

P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/center.html

TransUnion

P.O. Box 2000
Chester, PA 19106
1-800-680-7289
www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax

P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
www.equifax.com/personal/credit-report-services

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported promptly to law enforcement and the relevant financial institution. This notice has not been delayed by law enforcement.

For North Carolina residents, the Attorney General can be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226; 1-919-716-6400; and www.ncdoj.gov.

For Maryland residents, the Attorney General can be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and www.oag.state.md.us. Winebow can be contacted at 4800 Cox Road, Suite 300, Glen Allen, VA 23060.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services¹ from Kroll:

Triple Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data at any of the three national credit bureaus—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 fraud specialist, 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 can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

¹ Kroll's activation website is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari. To receive credit 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.