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CONSUMER PROTECTION

October 10, 2019

Anjali C. Das
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Anjali.Das@wilsonelser.com

Attorney General Gordon MacDonald
Office of the Attorney General
33 Capitol Street
Concord, NH 03302

Re: Data Security Incident

Dear Attorney General MacDonald:

We represent Worcester Community Housing Resources, Inc. ("WCHR"), located in Worcester, Massachusetts, with respect to a potential data security incident described in more detail below. WCHR takes the security and privacy of the information in its control very seriously and has taken steps to prevent a similar incident from occurring in the future.

1. Nature of the security incident.

WCHR is a non-profit organization that maintains affordable housing opportunities for low- to moderate-income households throughout the Worcester community. On July 2, 2019, WCHR discovered that an unknown individual potentially gained access to one of its employee's email accounts. WCHR immediately prevented any further unauthorized access to the account by changing the employee's email credentials. WCHR then commenced an investigation with the assistance of an independent computer forensic company to determine the nature and extent of the unauthorized access. The investigation concluded on July 31, 2019. WCHR determined that the incident affected the email accounts of five (5) WCHR employees. WCHR then searched for personal information in the affected email accounts and discovered individuals' names in combination with their Social Security numbers. No financial account information was involved in this incident. WCHR has no evidence of misuse of anyone's personal information.

2. Number of New Hampshire residents affected.

A total of two (2) New Hampshire residents were potentially affected by this incident. In total, eighty-four (84) individuals are being notified. Notification letters were mailed on October 10, 2019. A sample copy of the notification letter is included with this letter.

55 West Monroe Street, Suite 3800 • Chicago, IL 60603 • p 312.704.0550 • f 312.704.1522

Albany • Allentown • Austin • Baltimore • Beaumont • Boston • Chicago • Dallas • Denver • Edwardsville • Garden City • Hartford • Houston • Indiana • Kentucky
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3. Steps taken.

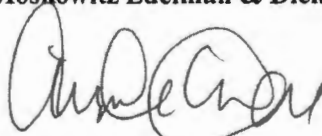
WCHR takes the security and privacy of the information in its control very seriously and has taken steps to prevent a similar event from occurring in the future, as well as to protect the privacy and security of potentially impacted individuals' information. This includes adding security protocols for two factor authentication, revising our Written Information Security Policy (WISP), and engaging a computer technology firm to supervise both the revisions and daily security for our system. WCHR also offered potentially impacted individuals with identity theft restoration and credit monitoring services for twelve (12) months at no cost through ID Experts.

4. Contact information.

WCHR remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at Anjali.Das@wilsonelser.com or (312) 821-6164.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP



Anjali C. Das

Enclosure.

WORCESTER COMMUNITY HOUSING RESOURCES, INC.

11 Pleasant Street, Suite 300, Worcester, MA 01609
508.799.0322 ▪ fax 508.799.7771
www.wchr.org ▪ Lender NMLS ID: 13635

To Enroll, Please Call:
1-800-939-4170
Or Visit:
<https://app.myidcare.com/account-creation/protect>

Enrollment Code:
<<XXXXXXXXXX>>

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

<<Date>>

Dear <<First Name>><<Last Name>>:

We are writing to inform you of a data security incident involving the Worcester Community Housing Resources that may have resulted in unauthorized access to some of your personal information, including your Social Security number. We take the privacy and protection of your personal information very seriously. Your trust is a top priority at Worcester Community Housing Resources, and we deeply regret any inconvenience this may cause. This letter contains information about what happened, steps we have taken and resources we are making available to you to protect your identity.

On July 2, 2019, we discovered an unknown individual potentially gained access to one of our employee's email accounts. It appears that our employee may have been the victim of an email phishing campaign. Upon discovering the incident, our IT department immediately prevented any further unauthorized access to the account by changing the employee's email credentials. We also retained an independent computer forensic firm to assist us with an investigation. On August 16, 2019, the investigation concluded that the incident was limited to five employee email accounts, and that no other systems or servers were impacted. We have no evidence that any emails and associated personal data was in fact stolen or misused.

The employees' accounts contained stored emails that may have included your personal information, such as your name and Social Security number. Although we are not aware that any of your personal information was accessed or taken, we are notifying you on the basis that your personal information may have been contained in the employees' compromised email accounts. We note, however, that the information involved would be limited to information you provided via email.

As a precautionary measure, we are providing you with complimentary resources to help protect your identity. We have secured the services of ID Experts®, the data breach and recovery services expert, to provide you with MyIDCare™. MyIDCare services include: 12 months of Credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, MyIDCare will help you resolve issues if your identity is compromised.

We encourage you to contact ID Experts with any questions and to enroll in free MyIDCare services by calling **1-800-939-4170** or going to **<https://app.myidcare.com/account-creation/protect>**; and using the Enrollment Code provided above. MyIDCare experts are available Monday through Friday from 6 am - 6 pm Pacific Time. Please note the deadline to enroll is January 10, 2020.

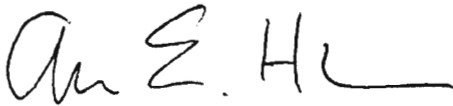
Please also review the enclosed "Additional Important Information" section included with this letter. This section describes additional steps you can take to help protect yourself, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file.

We are committed to ensuring security of all information in our control, and are taking steps to prevent a similar event from occurring in the future. This includes adding security protocols for two factor authentication, revising our Written

Information Security Policy (WISP), and engaging a computer technology firm to supervise both the revisions and daily security for our system.

Please know that the protection of your personal information is a top priority, and we sincerely regret any concern or inconvenience that this matter may cause you. If you have any questions, please do not hesitate to call (508) 799-0322 Monday through Friday from 8:30 AM to 5:00 PM Eastern Time.

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Howarth". The signature is fluid and cursive, with a long horizontal stroke at the end.

Andy Howarth
Director of Development & Financing
Worcester Community Housing Resources



Recommended Steps to help Protect your Information

- 1. Website and Enrollment.** Go to <https://ide.myidcare.com/customending>; and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.
- 2. Activate the credit monitoring** provided as part of your MyIDCare 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, MyIDCare will be able to assist you.
- 3. Telephone.** Contact MyIDCare at 1-800-939-4170 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

Additional Important Information

For residents of Hawaii, Michigan, Missouri, Virginia, Vermont, and North Carolina: It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

For residents of Illinois, Iowa, Maryland, Missouri, North Carolina, Oregon, and West Virginia:

It is required by state laws to inform you that you may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your 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 at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

For residents of Iowa:

State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon:

State laws advise you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of Maryland, Rhode Island, Illinois, and North Carolina:

You can obtain information from the Maryland and North Carolina Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Maryland Office of the Attorney General	Rhode Island Office of the Attorney General	North Carolina Office of the Attorney General	Federal Trade Commission
Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202 1-888-743-0023 www.oag.state.md.us	Consumer Protection 150 South Main Street Providence RI 02903 1-401-274-4400 www.riag.ri.gov	Consumer Protection Division 9001 Mail Service Center Raleigh, NC 27699-9001 1-877-566-7226 www.ncdoj.com	Consumer Response Center 600 Pennsylvania Ave, NW Washington, DC 20580 1-877-IDTHEFT (438-4338) www.ftc.gov/idtheft

For residents of Massachusetts: It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft

For residents of all states:

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with Equifax ([https://assets.equifax.com/assets/personal/Fraud Alert Request Form.pdf](https://assets.equifax.com/assets/personal/Fraud%20Alert%20Request%20Form.pdf)) or Experian (<https://www.experian.com/fraud/center.html>). 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. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, 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. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 www.freeze.equifax.com 800-525-6285	Experian Security Freeze P.O. Box 9554 Allen, TX 75013 www.experian.com/freeze 888-397-3742	TransUnion (FVAD) P.O. Box 2000 Chester, PA 19022 freeze.transunion.com 800-680-7289
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More information can also be obtained by contacting the Federal Trade Commission listed above.