



RECEIVED

JUN 10 2019

CONSUMER PROTECTION

LINN F. FREEDMAN

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Providence, RI 02903-2485
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Also admitted in Massachusetts

Sent via first-class mail

June 6, 2019

Attorney General Gordon MacDonald
Office of the Attorney General
ATTN: Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301

RE: Breach Notification

Dear Attorney General MacDonald:

Please be advised that we now represent ZOLL Services (“ZOLL”) in regard to a security incident. We are new counsel for ZOLL, and we have just become aware that although individuals were notified of this incident on March 18, 2019, your office was inadvertently not notified. Therefore, pursuant to RSA § 359-C:20, we are reporting to you, on behalf of ZOLL, that ZOLL notified four (4) New Hampshire residents of a breach of their personal information.

ZOLL was notified of the security incident on January 24, 2019 by its third-party service provider, Apptix, Inc. (“Apptix”), that Apptix’s vendor, Sonian, Inc. (“Sonian”), had inadvertently left a server port open during a data migration, which may have compromised Sonian’s systems between November 8, 2018 and December 28, 2018; as Apptix’s email archiving vendor, Sonian’s systems contained some of ZOLL’s emails. Based on confirmation from Sonian, ZOLL was not a specific target, but rather the emails of many of Sonian’s clients were exposed. The ZOLL emails affected by this security incident included patients’ first and last names, addresses, dates of birth, medical information and Social Security numbers.

After its own investigation, along with that of its third party forensics firm and Barracuda Networks, Inc.’s¹ internal investigation, ZOLL confirmed on February 20, 2019 that individuals’ data may have been accessed, but could not confirm that any copying or exfiltration of the data occurred, and sent notification letters to those individuals on March 18, 2019.

¹ Please note that Apptix has been acquired by and is now part of Fusion Connect, Inc., and that Sonian is a subsidiary of Barracuda Networks, Inc.
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The New Hampshire residents affected by this incident have received the enclosed notice pursuant to RSA § 359-C:20. ZOLL is offering the affected individuals credit monitoring at no charge for a period of twelve (12) months.

If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Linn F. Freedman". The signature is written in a cursive style with a long horizontal flourish at the end.

Linn F. Freedman

Enclosure

Individual Notification for Medical and SSN



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

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

Dear <<FirstName>> <<LastName>>,

ZOLL recently learned of a data security incident that may impact you. We are writing to notify you of this incident as well as provide you with information on actions ZOLL has taken in response, resources available to you, and steps you can take to protect yourself.

Notice of Data Security Incident

On January 24, 2019, ZOLL was notified of a data security incident involving an external third-party vendor which may have resulted in the exposure of some of your personal information. Based on our current assessment, we have no indication that any information has been used inappropriately. ZOLL is notifying all potentially impacted individuals.

What Happened?

ZOLL's email is archived by a third-party service provider to comply with record retention and maintenance requirements, policies, and procedures. Some of your personal information was included in the email communications stored by the third-party service provider.

During a server migration, some data from ZOLL emails was exposed. The vendor believes that the incident occurred between November 8, 2018 and December 28, 2018. At this point, we are not aware of any fraud or identity theft to any individual as a result of this exposure. The vendor has since confirmed that all information has been secured.

What Information Was Involved?

Information that may have been exposed includes your name, address, date of birth, limited medical information, and Social Security number.

What We Are Doing

We take the privacy and security of your personal information very seriously. Once we learned of the incident, we immediately initiated an internal review and have retained a leading independent forensics firm to help us conduct a thorough investigation of the incident. We have notified law enforcement and federal and state agencies to give them the opportunity to investigate.

Further, we are taking steps to review our process for managing third-party vendors and confirmed that the impacted vendor has also taken actions to help prevent against similar incidents in the future.

ZOLL is offering free credit and identity monitoring services for one year to all impacted individuals. These services help detect possible misuse of your personal information and provide you with identity monitoring services focused on identification and resolution of identity theft.

- Visit <<IDMonitoringURL>> to activate and take advantage of your identity monitoring services.
- You have until <<Date>> to activate your identity monitoring services.
- Membership Number: <<Member ID>>

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

What You Can Do

As an added precaution, we wanted to provide information on additional steps that may help to guard against potential fraud or identity theft. You can carefully review your account statements and credit reports for suspicious activity, accounts you did not open, or inquiries from creditors you did not initiate. You should remain vigilant and continue to monitor your statements for unusual activity. If you see anything suspicious on your statements or credit report, call the credit agencies and local law enforcement immediately, and consider filing a police report for identity theft.

Please review the enclosed "Additional Resources" 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.

For More Information

We sincerely regret any inconvenience or concern this incident may cause you. If you have any questions or need any additional information, please do not hesitate to contact us at 1-??-??-???? from 9:00am to 6:30pm Eastern Time, Monday through Friday, for additional information.

Sincerely,

ZOLL
privacy@zoll.com

Note: this is a legal notice that is required to be sent to all impacted individuals, which is why you are receiving this letter, even if you are no longer using ZOLL products.

This notice is provided by ZOLL Services LLC, a ZOLL group company.

Individual Notification for Deceased



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

To the family member of

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

To the family member of <<FirstName>> <<LastName>>,

ZOLL recently learned of a data security incident that may impact your family member. We are writing to notify you of this incident as well as provide you with information on actions ZOLL has taken in response, resources available to you, and steps you can take to protect your family member's information.

Notice of Data Security Incident

On January 24, 2019, ZOLL was notified of a data security incident involving an external third-party vendor which may have resulted in the exposure of some of your family member's personal information. Based on our current assessment, we have no indication that any information has been used inappropriately. ZOLL is notifying all potentially impacted individuals or their family members.

What Happened?

ZOLL's email is archived by a third-party service provider to comply with record retention and maintenance requirements, policies, and procedures. Some of your family member's personal information was included in the email communications stored by the third-party service provider.

During a server migration, some data from ZOLL emails was exposed. The vendor believes that the incident occurred between November 8, 2018 and December 28, 2018. At this point, we are not aware of any fraud or identity theft to any individual as a result of this exposure. The vendor has since confirmed that all information has been secured.

What Information Was Involved?

Information that may have been exposed includes your family member's name, address, date of birth, and limited medical information. A small percentage of patients also had Social Security numbers exposed.

What We Are Doing

We take the privacy and security of your family member's personal information very seriously. Once we learned of the incident, we immediately initiated an internal review and have retained a leading independent forensics firm to help us conduct a thorough investigation of the incident. We have notified law enforcement and federal and state agencies to give them the opportunity to investigate.

Further, we are taking steps to review our process for managing third-party vendors and confirmed that the impacted vendor has also taken actions to help prevent against similar incidents in the future.

What You Can Do

As an added precaution, we wanted to provide information on additional steps that may help to guard against potential fraud or identity theft. You can carefully review your family member's account statements and credit reports for suspicious activity, accounts your family member did not open, or inquiries from creditors your family member did not initiate. You should remain vigilant and continue to monitor your family member's statements for unusual activity. If you see anything suspicious on your family member's statements or credit report, call the credit bureaus and local law enforcement immediately, and consider filing a police report for identity theft.

Please review the enclosed "Additional Resources" section included with this letter. This section describes additional steps you can take to help protect your family member, 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 family member's credit file.

Spouses, executors and other representatives may request from each credit bureau that a deceased indicator be added to an individual's credit file. This should help prevent third parties from opening credit or using the credit file for fraudulent purposes. Each request should include a copy of the death certificate and proof of legal representation, such as a certificate of executorship or marriage. These documents can be sent by certified mail using the contact information listed on the next page. Please note, in many cases the credit reporting agencies may already be aware of the individual's passing. This is because lenders, creditors and the Social Security Administration often alert the credit agencies upon the death of a consumer.

For More Information

We sincerely regret any inconvenience or concern this incident may cause you. If you have any questions or need any additional information, please do not hesitate to contact us at 1-???-???-???? from 9:00am to 6:30pm Eastern Time, Monday through Friday, for additional information.

Sincerely,

ZOLL
privacy@zoll.com

Note: this is a legal notice that is required to be sent to all impacted individuals or family members, which is why you are receiving this letter.

This notice is provided by ZOLL Services LLC, a ZOLL group company.

Individual Notification for Medical Only



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

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

Dear <<FirstName>> <<LastName>>,

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What Information Was Involved?

Information that may have been exposed includes your name, address, date of birth, and limited medical information.

What We Are Doing

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