



PARTNERVEST

16631

March 6, 2020

[CLIENT]
[CLIENT MAILING ADDRESS] or [CLIENT EMAIL ADDRESS]

Re: Breach of Doug Gill's FullArc Wealth Management email account dgill@fullarcwealth.com

Dear [CLIENT]

On Monday, March 2, 2020, it came to PartnerVest's attention that Doug Gill's FullArc Wealth Management email account may have been accessed by an unknown third party. Doug's email account was re-secured immediately and PartnerVest continues to monitor for suspicious activity. PartnerVest is working closely with Doug and we are investigating whether any client information was compromised beyond access to client email addresses. To that end we will keep you apprised as necessary.

As a precaution, TD Ameritrade has added Loss Prevention Restriction to your investment advisory account(s). Any disbursements (i.e., wire transfer, ACH, or check) from the account(s) will require additional review by TD Ameritrade's Risk Management unit prior to approving the disbursement in order to confirm that the request is legitimate. PartnerVest will coordinate this activity in conjunction with Doug. In addition, all TD Ameritrade Institutional accounts have Asset Protection Guarantee. This guarantee means that if you lose cash or securities from your account due to unauthorized activity through no fault of your own, TD will reimburse you for the cash or shares of securities lost.

If you wish to have a new account number assigned, please contact PartnerVest Client Services at 1-888-966-1266 Option 2 to request a change.

We strongly encourage you, as ongoing best practice, to monitor for any unusual activity as it relates to your credit, and consider freezing your credit by notifying the three major consumer credit bureaus — Equifax, Experian and TransUnion. Freezing your credit is an effective, cost-free way to make it harder for thieves to open credit cards or other financial accounts in your name. It also can reduce your chances of becoming an identity theft victim. When you need a credit check you will, however, need to notify the credit bureau, but we believe the inconvenience is well worth it. You will need to contact each bureau separately.

Equifax – (800) 685-1111 <https://www.equifax.com/personal/credit-report-services/credit-freeze/>
Experian – (888)397-3742 <https://www.experian.com/freeze/center.html>
TransUnion – (888) 909-8872 <https://www.transunion.com/credit-freeze>

In addition, remember the following best practices for email use:

- If an email seems suspicious, contact the sender by phone
- Resist opening, responding or clicking on links from an unfamiliar email (Malware)
- Avoid the solicitation of personal information from unknown sources (Phishing)
- Do not provide confidential information on any social media such as Facebook, Twitter, etc. (Social Engineering)
- Do not share your email or financial services passwords with anyone



PARTNERVEST

Sincerely,

Tina Mahota
Chief Compliance Officer
PartnerVest Advisory Services, LLC

cc: Doug Gill



March 10, 2020

[CLIENT]
[CLIENT MAILING ADDRESS] or [CLIENT EMAIL ADDRESS]

Re: PLEASE READ THIS ENTIRE LETTER
IMPORTANT SECURITY NOTIFICATION
COMPLIMENTARY MEMBERSHIP EXPERIAN EXPERIAN'S® IDENTITYWORKS

Dear [CLIENT]:

I am contacting you on behalf of FullArc Wealth Management and Partnervest Advisory Services, LLC to notify you of an incident that potentially involved some of your personal information. While we have no evidence that your personal information was compromised and do not know if the incident resulted in unauthorized access to your personal information, we are notifying you since the possibility exists. This could include unauthorized access to information such as your full name, social security number or investment account number(s).

What we are doing to protect your information:

1. The breached system was re-secured immediately once Partnervest became aware of the breach, and we are taking active steps to implement additional authentication requirements.
2. To help protect your identity, **we are offering a complimentary two-year membership of Experian's® IdentityWorksSM.** This product provides you with identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:
 - **Ensure that you enroll by: 06/30/2020 (Your code will not work after this date.)**
 - **Visit the Experian IdentityWorks website to enroll:**
<https://www.experianidworks.com/3bplus>
 - **Provide your activation code: [XXXXXXXXXX]**

Experian IdentityWorks provides:

- Experian credit report at signup: See what information is associated with your credit file. Daily credit reports are available for online members only.*
- Credit Monitoring: Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- Internet Surveillance: Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- Identity Restoration: Identity Restoration specialists 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.



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 1-877-890-9332 by June 30, 2020. Be prepared to provide engagement number [engagement #] as proof of eligibility for the identity restoration services by Experian.

3. For clients who have accounts at TDAmeritrade, we have added Loss Prevention Restriction to your investment advisory account(s). Any disbursements (i.e., wire transfer, ACH, or check) from the account(s) will require additional review by TD Ameritrade's Risk Management unit prior to approving the disbursement in order to confirm that the request is legitimate. Partnervest will coordinate this activity in conjunction with Doug. In addition, all TD Ameritrade Institutional accounts have Asset Protection Guarantee. This guarantee means that if you lose cash or securities from your account due to unauthorized activity through no fault of your own, TD will reimburse you for the cash or shares of securities lost. If you wish to have a new account number assigned please contact Partnervest Client Services at 1-888-966-1266 Option 2 to request a change.
4. If applicable, we have also notified the State Authorities based upon your address of record. Specific information based upon your State Requirements can be found at the end of this letter.

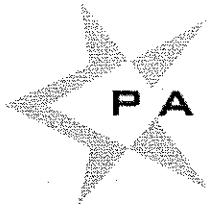
We sincerely apologize for this incident and any inconvenience it may cause you. We are continuing to monitor for suspicious activity and want to ensure that you are aware of the resources available to you. If you have any questions, please contact me at tinamahota@partnervest.com or 1-888-966-1266 x251.

Sincerely,

Tina Mahota
Chief Compliance Officer
Partnervest Advisory Services, LLC

cc: Doug Gill

* Offline members will be eligible to call for additional reports quarterly after enrolling ** 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.



PARTNERVEST

March 13, 2020

Attorney General Maura Healey
Office of the Attorney General
One Ashburton Place
Boston, MA 02108

Dear Attorney General Healey:

Pursuant to M.G.L. c. 93H, we are writing to notify you of data security incident involving three Massachusetts residents.

PartnerVest Advisory Services, LLC ("PartnerVest") is an SEC Registered Investment Adviser. Douglas Gill is an investment advisor representative of PartnerVest conducting investment advisory business under the dba FullArc Wealth Management.

Nature of the Data Security Incident

On Monday, March 2, 2020, it came to PartnerVest's attention that Doug Gill's FullArc Wealth Management email account may have been accessed by an unknown third party. Upon further investigation, PartnerVest believes that unauthorized access did occur within Mr. Gill's email account (dgill@fullarcwealth.com).

It is not evident that any client non-public information has been compromised through this email breach, and PartnerVest has not detected any misuse of client data, nor are we aware of any resulting identity theft, fraud, or financial losses to any clients as a result of this incident. However, since email files are unencrypted and may contain client non-public information, PartnerVest is operating under the assumption that the third party may have been able to access client non-public information such as social security number or investment account number through email files.

Number of Massachusetts Residents Potentially Affected

This incident potentially impacts three Massachusetts residents. These Massachusetts residents have been sent two notifications pursuant to M.G.L. c. 93H, s. 3(b) as described below and attached for your reference.

1. An initial letter was mailed to all potentially impacted clients on March 6 notifying them of a suspected potential access by a third party to Doug Gill's email and that Loss Prevention Restrictions were placed on their investment advisory account(s) at TDAmeritrade. The initial notification is attached.
2. A follow up letter was sent via trackable delivery to all potentially impacted clients on March 11 notifying them of the unauthorized email access, the steps that PartnerVest has taken, and the steps that the clients should consider to protect their identities. The follow up letter to Massachusetts residents is attached.

Steps PartnerVest Has Taken Related to the Incident

PartnerVest has no evidence that client personal information has been used for fraudulent purposes and has not reported the incident to law enforcement. PartnerVest has taken the following steps related to this incident:

PARTNERVEST ADVISORY SERVICES, LLC.

260 S. Hope Avenue C-2 • P.O. Box 1902, Santa Barbara, CA 93102
Tel (805) 966-1266 • Fax (805) 966-1299 • Toll Free (888) 991-9969

www.partnervest.com



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1. Mr. Gill's email account was re-secured immediately upon discovery of the incident and PartnerVest continues to monitor for suspicious activity.
2. PartnerVest is taking active steps to implement additional authentication requirements for access to PartnerVest email accounts.
3. As noted above, an initial letter was mailed to all potentially impacted clients on March 6 notifying them of a suspected potential access by a third party to Doug Gill's email.
4. As a precaution, all potentially impacted investment accounts were put under Loss Prevention Restriction at TD Ameritrade where the assets are held. Any disbursements (i.e., wire transfer, ACH, or check) from the account(s) will require additional review by TD Ameritrade's Risk Management unit prior to approving the disbursement in order to confirm that the request is legitimate. In addition, all TD Ameritrade Institutional accounts have Asset Protection Guarantee which guarantees that any cash or securities lost from the account due to unauthorized activity will be reimbursed.
5. All potentially impacted clients have been given the option to have a new account number assigned at TD Ameritrade.
6. All potentially impacted clients are being offered a complimentary two-year membership of Experian's® IdentityWorksSM. This product provides identity detection and resolution of identity theft. Clients may activate their memberships immediately.
7. If applicable, State Authorities are being notified. Law enforcement has not been notified.
8. As noted above, all potentially impacted clients were sent a follow up letter on March 11 including the steps that PartnerVest has taken, and the steps that the clients should consider to protect their identities.

PartnerVest maintains a written information security program (pursuant to 201 CMR 17.00 et seq.) which was in effect at the time of the incident. As noted above, PartnerVest is taking active steps to implement additional authentication requirements for access to PartnerVest email accounts which, when available for implementation, will be incorporated into the written information security program.

Credit Monitoring

As noted in item 6 above, PartnerVest is offering all potentially impacted clients a complimentary two-year membership of Experian's® IdentityWorksSM that provides identity detection and resolution of identity theft, including:

- **Experian Credit Report:** Provided at signup, as well as either daily or quarterly credit reports depending if the client is an online client or offline client.
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Internet Surveillance:** Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of the client's personal information on the Dark Web.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** Clients receive the same level of Identity Restoration support even after their two-year Experian IdentityWorks membership has expired.

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PARTNERVEST

- 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.)

Certification of Credit Monitoring Services

On behalf of PartnerVest Advisory Services, LLC, I hereby certify that credit monitoring services were provided to consumers in compliance with G.L. c. 93H, section 3A.

Tina Mahota
Chief Compliance Officer
tinamahota@partnervest.com or 1-888-966-1266 x251

Other Notification and Contact Information

PartnerVest notified the Massachusetts Director of Consumer Affairs and Business Regulation of this data security incident on March 13, 2020 via the Office's online Data Breach Notification Form.

If you have questions or need additional information, please contact Tina Mahota at tinamahota@partnervest.com or 1-888-966-1266 x251.

Sincerely,

Tina Mahota
Chief Compliance Officer
PartnerVest Advisory Services, LLC

Enclosures



You should remain vigilant by reviewing your account statements and monitoring your credit reports. You may receive a free annual credit report at www.annualcreditreport.com.

PLACING A SECURITY FREEZE ON YOUR CREDIT REPORT

You have a right to place a security freeze on your consumer credit report. The security freeze will prohibit a consumer reporting agency from releasing any information in your consumer report without your express authorization. A security freeze may be requested by sending a request by certified mail, overnight mail or regular stamped mail to a consumer reporting agency. The security freeze is designed to prevent credit, loans or services from being approved in your name without your consent. You should be aware that using a security freeze may delay, interfere with, or prevent the timely approval of any subsequent credit request or application you make regarding new loans. In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr, II, III, etc.); Social Security Number and date of birth;
2. If you have moved in the past five years, provide the addresses where you have lived over the prior five years;
3. Proof of current address, such as a utility bill or telephone bill;
4. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification etc.), and
5. If you are a victim of identity theft, include a copy of the police report, investigative report, or compliant to a law enforcement agency concerning identity theft.

The credit reporting agencies have 3 business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within 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. A consumer reporting agency must allow a consumer to place, lift, or remove a security freeze "free of charge" from a consumer report.

To place a security freeze on your credit report, contact the three credit reporting agencies below.

Equifax
(888) 298-0045
P.O. Box 105788
Atlanta, GA 30348-5788
www.equifax.com

Experian
(888)397-3742
P.O. Box 2002
Allen, TX 75013
www.experian.com

TransUnion
(888) 909-8872
P.O. Box 160
Woodlyn, PA 19094
www.transunion.com



PARTNERVEST

GOVERNMENT AND LAW ENFORCEMENT NOTIFICATION

If you discover suspicious activity in your account(s), on your credit report, or by any other means, you may wish to report the suspected identity theft to one or more of the following:

1. Local law enforcement or police department. You have a right to obtain a copy of any police report you file.
2. Federal Trade Commission
1-877-ID-THEFT (1-877-438-4338)
600 Pennsylvania Ave NW
Washington, DC 20580
<https://www.ftc.gov/>

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