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The investigation into this event is ongoing and this notice may be supplemented with new significant facts learned subsequent to its submission. By providing this notice, PG Management, LLC, Legend Directional Services, LLC, Progressive Pipeline Construction, LLC and Progressive Pipeline Holdings, LLC (collectively "Progressive Pipeline") does not waive any rights or defenses regarding the applicability of Massachusetts law, the applicability of the Massachusetts data event notification statute, or personal jurisdiction.

Background

Earlier this year, Progressive Pipeline became aware of suspicious activity within an employee's email account. Progressive Pipeline immediately began an investigation and changed the employee's account password. A third-party forensic investigator was also retained to determine the nature and scope of this event. The investigation determined that an unauthorized actor accessed several employee email accounts from February 27, 2019 through May 28, 2019. The investigator was unable to determine which, if any, emails and attachments within the email account were accessed or viewed. Therefore, the forensic investigator then undertook a time-consuming review of all the emails and attachments in the email accounts to determine whether they contained any sensitive information. The forensic expert completed its analysis of the contents of the email account on August 29, 2019 and prepared a list of individuals whose information was determined to be present in the emails or attachments located in the email account and possibly viewed by the unauthorized person. However, the file from the investigator did not include address information for all impacted individuals. Progressive Pipeline then searched its internal records in an attempt to locate the missing addresses. This review was completed on September 26, 2019.

The investigation determined that this event could impact certain personal information, including Social Security number and driver's license number or state-issued identification number.

Notice to Massachusetts Residents

On November 4, 2019, Progressive Pipeline began mailing written notice of this incident to the affected individuals, which includes approximately two (2) Massachusetts residents. Notice was mailed in substantially the same form as the letter attached hereto as *Exhibit A*.

Other Steps Taken and To Be Taken

Progressive Pipeline is also providing access to identity protection and credit monitoring services for two (2) years, through Kroll, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Progressive Pipeline is providing guidance on how to better protect against identity theft and fraud, including 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 incident of fraud and identity theft by reviewing account statement 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.

Progressive Pipeline is also providing written notice of this incident to other state regulators as necessary.

EXHIBIT A

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

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country >>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

PG Management, LLC ("PGM") is writing to make you aware of a recent data privacy event that may affect the security of personal information held by PGM.

The security of our employee's information is extremely important to us and we apologize for any inconvenience this incident may cause. Upon discovery of the event, PGM promptly launched an internal investigation and engaged the assistance of third-party investigators. We take this incident very seriously and are providing you with information and access to resources so that you can better protect your personal information, should you feel it is appropriate to do so.

As an added precaution, PGM is providing you with access to 24 months of free identity monitoring services through Kroll.

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 enroll.idheadquarters.com to activate and take advantage of your identity monitoring services.

You have until [Date] to activate your identity monitoring services.

Membership Number: <<Member ID>>

Additional information describing your services is included with this letter.

We encourage you to remain vigilant against incidents of identity theft, to review your financial account statements, and to monitor your credit reports and explanation of benefits forms for suspicious activity. 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

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872
www.transunion.com

Equifax
PO Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
www.equifax.com

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.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, etc.);
7. 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) to three (3) business days after receiving your request to place a security freeze on your credit file report, based upon the method of the request. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with the process by which you may remove the security freeze, including an authentication mechanism. Upon receiving a direct request from you to remove a security freeze and upon receiving proper identification from you, the consumer reporting agency shall remove a security freeze within one (1) hour after receiving the request by telephone for removal or within three (3) business days after receiving the request by mail for removal.

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 above.

Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

You can also 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, your state Attorney General, or the Federal Trade Commission (FTC). The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (877-438-4338); and TTY: 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 also obtain further information on how to file such a complaint by way of the contact information listed above. Instances of known or suspected identity theft should also be reported to law enforcement, the FTC, and the Massachusetts Attorney General.

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 call us at 1-???-???-????, Monday through Friday, 8:00 a.m. to 5:30 p.m., Central Time.

Sincerely,

PG Management, LLC

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

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

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—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 Chrome, Firefox, Safari and Edge. 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.