

17281



STEEL PARTNERS

July 28, 2020

[first name] [last name]  
[street address]  
[city] [state] [zip]

RE: Notice of a Data Breach

Dear [first name] [last name],

Steel Partners values our employees and stakeholders and understands the importance of protecting personal information. We are writing to inform you about an incident that may involve some of your information that was collected by Steel Partners, a portfolio company of Steel Partners, and/or a pension plan administered by Steel Partners.

We are offering you a complimentary two-year subscription to Experian IdentityWorks, a credit monitoring and identity theft protection service provided by Experian. This product provides you with superior 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: [enrollment end date] (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: [enrollment URL]
- Provide your activation code: [activation code]

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 [customer service number] by [enrollment end date]. Be prepared to provide engagement number [engagement number] as proof of eligibility for the identity restoration services by Experian. At the end of your free subscription, it will be canceled and you will not be billed.

We take the safety and security of your information seriously. We regret any concern this may have caused you. For guidance on ways to protect yourself, please see the section that follows this notice. If you have questions or need additional information, please call [call center phone number].

Sincerely,

Steel Partners

## **GUIDANCE FOR PROTECTING YOUR IDENTITY AND PERSONAL INFORMATION**

Massachusetts law grants you the right to obtain any police report filed concerning this security 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.

Massachusetts law also permits consumers to request a security freeze. A security freeze prohibits a credit reporting agency from releasing any information from your credit report without written authorization. Be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. There is no fee for placing, lifting or removing a security freeze on a credit report.

To place a security freeze on your credit reports, you must separately place a security freeze on your file at each of the three major reporting agencies. You may contact each of the credit reporting agencies at the addresses below for more information:

**Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, [www.equifax.com](http://www.equifax.com), 1-800-349-9960

**Experian Security Freeze**, PO Box 9554, Allen, TX 75013, [www.experian.com](http://www.experian.com), 1-888-397-3742

**TransUnion Freeze**, PO Box 2000, Chester, PA 19022-2000, [www.transunion.com](http://www.transunion.com), 1-800-909-8872

In order to request a security freeze, you will need to provide the following information:

1. Your full name, address, Social Security number, and date of birth;
2. Addresses where you lived over the previous five years;
3. Proof of current address such as a utility or phone bill;
4. A photocopy of a government issued identification card;
5. If you are an identity theft victim, include a copy of the police report, investigative report, or complaint.

The credit reporting agencies will place a freeze providing credit reports to potential creditors three business days from receiving your letter. The credit reporting agencies will send you a confirmation letter containing a unique PIN or password that can be used to authorize the removal or lifting of a security freeze, five business days from receiving your letter to place a freeze on your account.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, you must call or send a written request to the credit reporting agencies by mail and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze as well as the identity of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have three (3) business days after receiving your request to lift the security freeze for those identified entities or for the

specified period of time.

To remove the security freeze, you must send a written request to each of the three credit bureaus by mail and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have three (3) business days after receiving your request to remove the security freeze.

**Addendum to the August 2, 2020 Data Breach Report by Steel Partners to the  
Massachusetts Office of Consumer Affairs and Business Regulation**

Steel Partners originally provided written notification on June 29 via postal mail to 1,121 Massachusetts residents. As a result of its continued investigation, Steel Partners provided written notice on July 28 via postal mail to an additional 399 Massachusetts residents.

Steel Partners indicated on the attached form that medical information was involved in the security incident at issue here. The company made this report out of an abundance of caution. The user mailbox that may have been breached in this case contained both structured and unstructured data, including scanned images containing handwritten information, that may have contained limited health information provided by employees for administrative purposes. While we have identified a limited amount of medical information in the mailbox, we have not associated this information with a Massachusetts resident.

Additionally, Steel Partners maintains written policies addressing information security. The company has also enhanced its existing security measures in light of this breach. Steel Partners continually evaluates its cybersecurity program, policies, and practices, and is utilizing a third party security consultant to assist with further aligning its program, policies, and practices with Massachusetts standards.