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**NEXPLANON OBSERVATIONAL RISK ASSESSMENT (NORA)  
INTERNATIONAL ACTIVE SURVEILLANCE STUDY - SAFETY OF CONTRACEPTIVES:  
ROLE OF ESTROGENS (INAS-SCORE)**

Dear Sample A Sample:

We are writing regarding a recent incident that may have involved your personal information.

The related health studies that you may know as the Nexplanon Observational Risk Assessment (NORA) or the International Active Surveillance Study - Safety of Contraceptives: Role of Estrogens (INAS-SCORE) (“the Study”) experienced a security incident that may have involved certain personal information of yours.

While we have no indication that any data related to the Study were actually stolen, viewed, or misused, we are taking the precautionary step of notifying you about the incident. The personal information involved may have included your name, social security number, and medical and health information that was part of the Study.

It is always advisable that individuals regularly review their financial accounts and report any suspicious or unrecognized activity immediately. The enclosed “Identity Theft Information” provides further information about steps that individuals can take. Federal consumer protection agencies recommend vigilance for the next 12 to 24 months and that you report any suspected incidents of fraud to the relevant financial institution.

We are offering you a range of identity protection services for 24 months provided by Experian’s® IdentityWorks<sup>SM</sup> at no cost to you. The opportunity to subscribe to these services is not intended to suggest that you are at substantial risk of harm.



The complimentary membership in Experian's® IdentityWorks<sup>SM</sup> provides you with identity detection and resolution of identity theft services. To activate this membership for monitoring your personal information please follow the steps below:

- Ensure that you enroll by February 28, 2021 (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your activation code: **ABCDEFGHI**
- Provide your Engagement #: DB24071

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 (866) 617-1923 by Monday through Friday from 9 a.m. to 11 p.m. EST, and Saturday and Sunday from 11 a.m. to 8 p.m. EST. Be prepared to provide engagement number DB24071 as proof of eligibility for the identity restoration services by Experian.

We are committed in our efforts to maintain the security of personal information and study data. Should you have any further questions please contact us using the contact information above.

Sincerely,

The Study Team

## IDENTITY THEFT INFORMATION

It is always advisable to regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at [www.annualcreditreport.com](http://www.annualcreditreport.com) by calling toll free 1.877.322.8228, or by mailing an Annual Credit Report Request Form (available at [www.annualcreditreport.com](http://www.annualcreditreport.com)) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below:

- **Equifax**, P.O. Box 740241, Atlanta, Georgia 30374-0241. 1.800.685.1111. [www.equifax.com](http://www.equifax.com)
- **Experian**, P.O. Box 9532, Allen, TX 75013. 1.888.397.3742. [www.experian.com](http://www.experian.com)
- **TransUnion**, 2 Baldwin Pl., P.O. Box 1000, Chester, PA 19016. 1.800.916.8800. [www.transunion.com](http://www.transunion.com)

**Fraud Alert:** You may contact the fraud department of the three major credit bureaus to request that a "fraud alert" be placed on your file. A fraud alert notifies potential lenders to verify your identification before extending credit in your name.

Equifax:	Report Fraud:	1.800.685.1111
Experian:	Report Fraud:	1.888.397.3742
TransUnion:	Report Fraud:	1.800.680.7289

**Security Freeze for Credit Reporting Agencies:** You may request a security freeze on your credit reports. A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without written authorization. However, please 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. It is free to place, lift or remove a security freeze. You must separately place a security freeze on your credit report at each credit bureau. To do so, you must contact the credit bureaus by phone, mail, or secure electronic means:

- **Equifax:** P.O. Box 105788, Atlanta, GA 30348, 1.800.349.9960, [www.Equifax.com](http://www.Equifax.com)
- **Experian:** P.O. Box 9554, Allen, TX 75013, 1.888.397.3742, [www.Experian.com](http://www.Experian.com)
- **TransUnion:** P.O. Box 2000, Chester, PA 19106, 1.888.909.8872, [www.TransUnion.com](http://www.TransUnion.com)

To request a security freeze, you will need to provide the following:

- Your full name (including middle initial, Jr., Sr., Roman numerals, etc.),
- Social Security number
- Date of birth
- Address(es) where you have lived over the prior five years
- Proof of current address such as a current utility bill
- A photocopy of a government-issued ID card
- 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



If you request a freeze online or by phone, the agency must place the freeze within one business day. The credit bureaus have three business days after receiving a request by mail to place a security freeze on your credit report, and they must also send confirmation to you within five 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. To lift the freeze to allow a specific entity or individual access to your credit report, you must contact the credit reporting agencies and include (1) proper identification; (2) the PIN number or password provided to you when you placed the security freeze; and (3) the identities 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.

You also have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit [www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf](http://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf) or [www.ftc.gov](http://www.ftc.gov).

#### Steps You Can Take if You Are a Victim of Identity Theft

- File a police report. Get a copy of the report to submit to your creditors and others that may require proof of a crime.
- Contact the U.S. Federal Trade Commission (FTC). The FTC provides useful information to identity theft victims and maintains a database of identity theft cases for use by law enforcement agencies. File a report with the FTC by calling the FTC's Identity Theft Hotline: 1-877-IDTHEFT (438-4338); online at <http://www.ftc.gov/idtheft>; or by mail at Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Ave., N.W., Washington, D.C. 20580. Also request a copy of the publication, "Take Charge: Fighting Back Against Identity Theft" from to <https://www.consumer.ftc.gov/articles/pdf-0009-identitytheft-a-recovery-plan.pdf>
- Keep a record of your contacts. Start a file with copies of your credit reports, the police reports, any correspondence, and copies of disputed bills. It is helpful to log conversations with creditors, law enforcement officials, and other relevant parties.

Additional Steps to Avoid Identity Theft: The FTC has further information about steps to take to avoid identity theft at: <http://www.ftc.gov/idtheft>; calling 1-877-IDTHEFT (438-4338); or write to Consumer Response Center, Federal Trade Commission, 600 Pennsylvania Ave., N.W., Washington, D.C. 20580.

**Massachusetts residents** are reminded that you have the right to obtain a police report and request a security freeze as described above. There is no charge to place a security freeze on your account; however, you may be required to provide the credit reporting agency with certain personal information (such as your name, Social Security Number, date of birth and address) and proper identification (such as a copy of a government-issued ID card and a bill or statement) prior to its honoring your request.

17 November 2020

Dear Rohan Massey,

**Case reference number: INV/0826/2020**

Based on the information you have provided, we have decided that regulatory action is not required in this case.

**The requirements of the GDPR**

We have considered whether Kantar Group Limited has complied with the requirements of Article 5(f), the GDPRs security principals.

**Our consideration of this case and recommendations**

After careful consideration based on the information that has been provided, we have decided not to take any formal enforcement action on this occasion.

It is noted that the risks to data subjects was low. This is because;

- The nature and seriousness of the breach
- The number of individuals affected
- The duration of the breach
- The speed in which you resolved the attack vector
- The action already taken

There is also additional evidence that demonstrates that you took due diligence in sourcing a reputable third-party cyber security company.

If any new information has come to light during your own investigation, or if any detriment has occurred to data subjects during the investigation that we are not aware of, you will be required to contact us. You can do so by replying to this email, otherwise, we now consider this matter closed.

Thank you for reporting this incident to the Information Commissioner's Office.

Yours sincerely,

John Wallace  
Cyber Investigations Officer  
Tel. 0330 313 1850



Information Commissioner's Office

Email, [John.Wallace@ico.org.uk](mailto:John.Wallace@ico.org.uk)

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[https://ico.org.uk/media/about-the-ico/policies-and-procedures/1890/ico\\_enforcement\\_communications\\_policy.pdf](https://ico.org.uk/media/about-the-ico/policies-and-procedures/1890/ico_enforcement_communications_policy.pdf)

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