



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

18783

To Enroll, Please Call:
(855) 414-6046
Or Visit:

<https://www.experianidworks.com/plus>
Enrollment Code: ABCDEFGHI
Engagement # DB24894

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SAMPLE A SAMPLE - L03 MA
APT 123
123 ANY ST
ANYTOWN, US 12345-6789



January 29, 2021

Subject: Notice of Data Security Incident

Dear Sample A Sample,

I am writing to inform you of a data security incident that may have involved your personal information. At High Falls Advisors ("HFA"), we take the privacy and security of personal information in our possession very seriously. This is why I am writing to notify you of this incident and provide information on steps you can take to protect your information, including enrolling in the complimentary identity monitoring services HFA is making available to you.

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 may also place a security freeze on your credit reports, free of charge. 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. Under federal law, you cannot be charged to place, lift, or remove a security freeze.

You must place your request for a freeze with each of the three major consumer reporting agencies: Equifax (www.equifax.com); Experian (www.experian.com); and TransUnion (www.transunion.com). To place a security freeze on your credit report, you may send a written request by regular, certified or overnight mail at the addresses below. You may also place a security freeze through each of the consumer reporting agencies' websites or over the phone, using the contact information below:

Equifax Security Freeze

P.O. Box 105788
Atlanta, GA 30348
1-800-349-9960

<https://www.equifax.com/personal/credit-report-services/>

Experian Security Freeze

P.O. Box 9554
Allen, TX 75013
1-888-397-3742

<https://www.experian.com/freeze/center.html>

TransUnion Security Freeze

P.O. Box 160
Woodlyn, PA 19094
1-888-909-8872

<https://www.transunion.com/credit-freeze>



In order to request a security freeze, you will need to provide some or all of the following information to the credit reporting agency, depending on whether you do so online, by phone, or by mail:

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, the addresses where you have lived over the prior five years;
5. Proof of current address, such as a current utility bill, telephone bill, rental agreement, or deed;
6. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.);
7. Social Security Card, pay stub, or W2;
8. 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 report, based upon the method of your request. The credit bureaus must also send written confirmation to you within five (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. It is important to maintain this PIN/password in a secure place, as you will need it to lift or remove the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, you must make a request to each of the credit reporting agencies by mail, through their website, or by phone (using the contact information above). You must provide proper identification (including 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 identities of those entities or individuals you would like to receive your credit report. You may also temporarily lift a security freeze for a specified period of time, rather than for a specific entity or individual, using the same contact information above. The credit bureaus have between one (1) hour (for requests made online) and three (3) business days (for request made by mail) after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

As an added precaution, we are offering you a complimentary one-year membership to Experian's® IdentityWorksSM. The Experian® IdentityWorksSM membership includes credit monitoring, internet surveillance for your information, and resolution services in case you are a victim of identity theft. To activate your membership, visit <https://www.experianidworks.com/plus> or call (855) 414-6046 and provide the activation code listed at the top of this letter. The deadline to enroll in the membership is April 30, 2021.

Please note that, to receive the credit monitoring services offered through Experian, you must be over the age of 18, have established credit in the United States, have a Social Security number issued in your name, and have a United States residential address associated with your credit file.

We have also provided additional guidance and resources attached to this letter to assist you in further protecting your personal information. We recommend that you review your current and past credit and debit card account statements for discrepancies or unusual activity. If you see anything that you do not understand or that looks suspicious, or if you suspect that any fraudulent transactions have taken place, you should call the bank that issued the card immediately.

You may also contact the Federal Trade Commission (FTC) to learn more about how to prevent identity theft using the contact information below:

FTC, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, D.C. 20580,
www.ftc.gov/bcp/edu/microsites/idtheft/, 877-IDTHEFT (438-4338)

We also encourage you to enroll in the complimentary identity protection services offered through Experian by calling (855) 414-6046 or going to <https://www.experianidworks.com/plus> and using the Enrollment Code provided above. If you have questions or need assistance, please contact Experian's customer care team at (855) 414-6046. Be prepared to provide your engagement number DB24894 as proof of eligibility for the identity restoration services offered through Experian. Representatives are available to assist you Monday through Friday from 9 am – 11 pm Eastern Standard Time, or Saturday and Sunday from 11 am – 8 pm Eastern Standard Time (excluding major U.S. holidays).

We take your trust in us and the protection of your information very seriously. Please accept our sincere apologies for any worry or inconvenience that this may cause you.

Sincerely,



Kenneth J. Burke, CPA/PFS, CBEC®
President



STEPS YOU CAN TAKE TO FURTHER PROTECT YOUR INFORMATION

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You also can contact one of the following three national credit reporting agencies:

TransUnion
P.O. Box 1000
Chester, PA 19016
1-800-916-8800
www.transunion.com

Experian
P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com

Equifax
P.O. Box 740241
Atlanta, GA 30374
1-866-349-5191
www.equifax.com

Free Annual Report
P.O. Box 105281
Atlanta, GA 30348
1-877-322-8228
annualcreditreport.com

Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: Under U.S. law, you have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state. Contact information for the FTC is:

Federal Trade Commission
600 Pennsylvania Ave, NW, Washington, DC 20580
Tel: 1-877-438-4338
Websites: www.consumer.ftc.gov or www.ftc.gov/idtheft

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **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 file 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 believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at **(855) 414-6046**. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for one year from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

* 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.





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File No. 30841.1176

February 10, 2021

VIA ONLINE FORM SUBMISSION

Undersecretary Edward A. Palleschi
Massachusetts Office of Consumer Affairs
and Business Regulation
501 Boylston St, Suite 5100
Boston, MA 02116
Email: data.breaches@mass.gov

Re: Notification of Data Security Incident

Dear Undersecretary Edward A. Palleschi:

We represent High Falls Advisors, Inc. ("HFA") in connection with a recent data security incident, which is described in greater detail below. HFA is a tax preparation and financial services firm based in Rochester, New York. This letter is submitted on behalf of HFA pursuant to Massachusetts General Laws Chapter 93H. HFA takes the protection of all sensitive information within its possession very seriously and is taking steps to prevent a similar incident from occurring in the future.

1. Nature of the security incident.

HFA recently learned of unusual activity involving an HFA employee email account. Upon discovering this activity, HFA immediately began an investigation and took steps to secure its email system. HFA also engaged an independent, digital forensics firm to determine what happened and whether personal information had been accessed or acquired without authorization. The forensic investigation ultimately concluded that one (1) HFA employee email account may have been accessed without authorization at some point between August 24, 2020 and August 27, 2020. HFA promptly engaged a third-party vendor to assist with data mining and manual review of the contents of the identified account to determine whether any personal information may have been contained therein.

Given the type and quantity of data, significant time and resources were required to complete the review which was completed on December 15, 2020. HFA then worked diligently to identify the current mailing addresses for each potentially impacted individual in order to notify them of the incident. On January 14, 2021, HFA learned that personal information belonging to twelve (12) Massachusetts residents was contained within the email account. The information potentially impacted by this incident may have included the notified individual's name, driver's license number, and/or financial account information (without the associated password or routing number). No Massachusetts residents' Social Security numbers were impacted by this incident.

2. Number of Massachusetts Residents Potentially Affected.

HFA issued notification letters to the twelve (12) Massachusetts residents regarding this data security incident via written letter mailed on January 29, 2021. A sample copy of the notification letter is attached hereto.

3. Steps taken relating to the incident.

HFA has taken steps in response to this incident to enhance the security of personal information in its possession in an effort to prevent similar incidents from occurring in the future. These measures included: mandating password resets, implementing multi-factor authentication for all user accounts within its environment, updating its IT security policies, as well as enabling unified audit logging features to detect any future suspicious activity within its email environment going forward. HFA has also commenced practices to routinely review any security alerts or notifications from its Office 365 email tenant to detect potentially malicious incoming emails. Furthermore, HFA has offered complimentary credit monitoring and identity theft protection services through Experian to all individuals potentially impacted by this incident, as an added layer of protection.

4. Contact information.

HFA remains dedicated to protecting the personal information in its possession. If you have any questions, or need additional information, please do not hesitate to contact me at (412) 567-5113, or by e-mail at Lauren.Godfrey@lewisbrisbois.com.

Very truly yours,

Lauren D. Godfrey

Lauren D. Godfrey of
LEWIS BRISBOIS BISGAARD & SMITH LLP

LDG

cc: Jenna Disser, Lewis Brisbois Bisgaard & Smith

Enclosure: Consumer Notification Letter (Sample)