



RECEIVED

NOV 27 2023

November 21, 2023

OFFICE OF CONSUMER AFFAIRS

BY U.S. MAIL

Office of Consumer Affairs and Business Regulation
Attn: Undersecretary Edward A. Palleschi
501 Boylston St., Suite 5100
Boston, MA 02116

Massachusetts Office of the Attorney General
Data Privacy and Security Division
Attn: Data Breach Notification
One Ashburton Place
Boston, MA 02108

To Whom It May Concern:

On behalf of International Paper Company ("International Paper"), and pursuant to Mass. Gen. Laws ch. 93H § 3(b), this letter provides notice of a third-party cybersecurity incident involving Massachusetts individuals.

On September 15, 2023, International Paper was made aware that a security incident experienced by its third-party service provider, Welltok, Inc. ("Welltok") (the "Welltok Incident") impacted certain data of International Paper's self-funded group health plan ("IP Plan"). Welltok, located at 1515 Arapahoe Street, Tower 3, Suite 700, Denver, CO 80202, provides International Paper with employee benefits and wellness services in connection with International Paper's self-funded employee health benefits and uses the MOVEit Transfer tool to securely transfer files. On or around May 31, 2023, Progress Software, the provider of the MOVEit Transfer tool, disclosed that a vulnerability in their software had been exploited by an unauthorized actor. Upon learning of the vulnerability, Welltok has advised that it immediately installed all published patches and investigated the potential impact on the MOVEit Transfer server. On July 26, 2023, Welltok was alerted to an alleged compromise of its MOVEit Transfer server and following additional investigation determined that an unknown actor exploited its MOVEit Transfer server on May 30, 2023, and exfiltrated certain data. On October 19, 2023, Welltok notified the IP Plan of the nature and scope of the data present on the impacted server, including confirmation of impacted participants and their respective jurisdictions.

Welltok has advised that it took a number of actions in response to the Welltok Incident, including implementing new technical safeguards. Welltok has advised that it notified law enforcement of the Welltok Incident on July 28th, and provided a supplemental amended report on October 8th.



Neither International Paper nor the IP Plan utilizes the MOVEit Transfer tool and International Paper's systems were in no way impacted by the incident. International Paper maintains a Written Information Security Program (WISP).

International Paper has no indication of identity theft or fraud in relation to this event. A preliminary analysis shows that personal information of approximately 34 Massachusetts individuals was affected by the Welltok Incident. Welltok has also informed International Paper that the personal information acquired included name, mailing address, date of birth, Social Security number, insurance carrier name, health plan ID, health insurance member ID, and subscriber number. International Paper notified the Consumer Reporting Agencies via U.S. mail on November 17, 2023. International Paper has also notified the Department of Health and Human Services and is taking steps to comply with its obligations under 45 C.F.R. § 164.400 *et seq.*

International Paper and Welltok anticipate sending these individuals formal notice by November 22, 2023 via U.S. mail. A sample notification letter is enclosed. As stated in the attached sample notice, impacted individuals will be offered 24 months of complimentary credit monitoring through Experian IdentityWorks and minor dependents are being offered identity protection services. International Paper acknowledges that the credit monitoring offered to affected individuals complies with Section 3A of Chapter 93H.

International Paper takes this matter very seriously and is committed to answering any questions you may have. If you have any questions regarding this submission, please do not hesitate to contact me at nicole.walthour@ipaper.com or 901-419-3850.

* * *

This correspondence, and any attachments, contains confidential, proprietary commercial or financial information, documentation, business plans, strategies, and other information that are not otherwise available to the public, and that, if disclosed, could cause substantial injury to the competitive position of International Paper and its affiliates. Accordingly, International Paper respectfully requests that this filing and its exhibits be afforded confidential treatment and be excepted from disclosure.

Respectfully yours,

/s/ Nicole M. Walthour
Chief Global Privacy Officer and Deputy Ethics & Compliance Officer
International Paper Company
6400 Poplar Avenue, Memphis TN 38197

Sample Individual Notification Letter



<<Return Mail Address>>

<<Name 1>> <<Name 2>>

<<Address 1>>

<<Address 2>>

<<Date>>

<<City>>, <<State>> <<Zip>>

Notice of Data Breach

Dear <<Name 1>> <<Name 2>>:

Welltok, Inc. writes on behalf of the International Paper Company Group Health and Welfare Plan (the IP Plan) to inform you of a security event that affected the security of your personal information (including certain electronic protected health information). Welltok provides the CafeWell platform for the My Benefits Portal, the employee benefits engagement hub for International Paper, and received your information in connection with providing these services. Although we have no indication of identity theft or fraud related to your information, we are providing you with information about the incident, our response to it, and resources available to you help protect your information.

What Happened? Welltok, Inc. uses the MOVEit Transfer tool to securely transfer files. On or around May 31, 2023, Progress Software, the provider of MOVEit Transfer tool, disclosed that a vulnerability in their software had been exploited by an unauthorized actor. Upon learning of the vulnerability, we immediately installed all published patches and conducted an investigation to determine the potential impact on the MOVEit Transfer server. On July 26, 2023, we were alerted that our MOVEit Transfer server may have been impacted and following additional investigation determined that an unknown actor accessed the MOVEit Transfer server on May 30, 2023, and exfiltrated certain data. We subsequently reviewed data stored on the server at the time of this incident and determined that certain of your personal information was present on the impacted server at the time of the event.

In September, Welltok informed the IP Plan that the security event impacted the IP Plan's data, and on October 19, 2023, Welltok notified the IP Plan of the nature and scope of the data present on the impacted server, including identification of impacted participants and their respective jurisdictions. Since then, we have been coordinating efforts with the IP Plan to review and verify the affected information and provide direct notice to impacted individuals.

What Information Was Involved? The following types of your information were among the data impacted in this event: <<Data Elements>>. While we have no evidence of identity theft or fraud related to this event, we are notifying you and providing information and resources to help protect your personal information.

What We Are Doing. We take this event and the security of personal information in our care very seriously. Upon learning of this event, we moved quickly to investigate and respond to the event and notify potentially affected individuals. As part of our ongoing commitment to the security of information, we are reviewing and enhancing our existing policies and procedures related to data privacy to reduce the likelihood of a similar future event.

As an added precaution, we are providing you with access to 24 months of credit monitoring and identity protection services provided by Experian. A description of services and instructions on how to enroll can be found within the enclosed Steps You Can Take to Help Protect Your Information. Please note that you must complete the enrollment process yourself, as we are not permitted to enroll you in these services on your behalf.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by regularly reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. You may also review the information contained in the enclosed Steps You Can Take to Help Protect Your Information. There you will also find more information on the credit monitoring and identity restoration services we are making available to

you. While Welltok will cover the cost of these services, you will need to complete the activation process. Enrollment instructions are included in this letter.

For More Information. If you have additional questions, or need assistance, please call 1-800-628-2141, which is available between the hours of 9:00 a.m. and 11:00 p.m. Eastern Standard Time on weekdays and 11:00 a.m. and 8:00 p.m. Eastern Standard Time on weekends, excluding major U.S. holidays.

We apologize for any inconvenience to you and remain dedicated to protecting the information in our care.

Sincerely,

Welltok, Inc.

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for # months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed, an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (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 Identity Restoration is available to you for # months 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.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary #-month membership. This product provides you with superior identity detection and resolution of identity theft. To 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 that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at [Experian TFN] by [Enrollment End Date]. Be prepared to provide engagement number [B#####] as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24-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.
- **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.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended "fraud alert" on a credit file at no cost. An initial fraud alert is a one-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 three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a "credit freeze" on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer's express authorization. The credit 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 credit 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 credit freeze on your credit report. To request a credit freeze, you may need to provide some or all of the following information:

1. Full name (including middle initial, as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to 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, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a fraud alert or a credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-800-916-8800
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances

of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 1-202-727-3400; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active-duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fera.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; 1-401-274-4400; and www.riag.ri.gov. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 14 Rhode Island residents impacted by this event.