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McDonald Hopkins

A business advisory and advocacy law firm®

CONSUMER PROTECTION

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Spencer S. Pollock, CIPP/US, CIPM
Direct Dial: 1.410.456.2741
Cell: 1.410.917.5189
Email: spollock@mcdonaldhopkins.com

July 25, 2022

VIA U.S. MAIL

Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Gannon Associates – Incident Notification

Dear Sir or Madam:

McDonald Hopkins PLC represents Gannon Associates (“Gannon”). I am writing to provide notification of an incident at Gannon that may affect the security of personal information of approximately one (1) New Hampshire resident. Gannon’s investigation is ongoing, and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, Gannon does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

On June 14, 2022, Gannon discovered that an unauthorized party may have accessed its network and potentially acquired a limited number of Gannon documents. Upon learning of this issue, Gannon immediately commenced a prompt and thorough investigation and took steps to contain the incident. As part of its investigation, Gannon engaged external cybersecurity professionals experienced in handling these types of incidents. Though the investigation is ongoing, Gannon determined on June 20, 2022, that the unauthorized party may have removed certain files and folders from the network that contain some personal information, specifically the affected resident’s full name and one or more of the following: Social Security number and/or driver’s license number. Gannon is submitting this notification on behalf of itself and certain business client(s) whose data was impacted by this incident, listed in **Exhibit A**. Finally, on July 22, 2022, Gannon identified the most recent contact information of the one (1) New Hampshire resident.

To date, Gannon is not aware of any reports of identity fraud or improper use of any information as a direct result of this incident. Nevertheless, out of an abundance of caution, Gannon wanted to inform you (and the affected residents) of the incident and to explain the steps that it is taking to help safeguard the affected residents against identity fraud. Gannon is providing the affected residents with written notification of this incident commencing on or about July 26, 2022

Chicago | Cleveland | Columbus | Detroit | West Palm Beach

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in substantially the same form as the letter attached hereto as Exhibit B¹. Gannon is offering the affected residents complimentary two-year memberships with a three-bureau credit monitoring services. Gannon is advising the affected resident about the process for placing fraud alerts and/or security freezes on his/her credit files and obtaining free credit reports. The affected resident is also being provided with the contact information for the consumer reporting agencies and the Federal Trade Commission.

At Gannon, protecting the privacy of personal information is a top priority. Finally, Gannon is working to implement any necessary additional safeguards, improving its policies and procedures related to data protection, improving its cybersecurity infrastructure, and further training its employees on best practices to minimize the likelihood of this type of incident occurring again.

Should you have any questions regarding this notification, please contact me at 410.456.2741 or spollock@mcdonaldhopkins.com. Thank you for your cooperation.

Very truly yours,

Spencer S. Pollock

Encl.

¹ Please note that notifications are being hand delivered to a number of individuals.

EXHIBIT A

- DairyOne Cooperative

EXHIBIT B

Gannon Associates
P.O. Box 3923
Syracuse, NY 13220



28 Main Street
Towanda, PA 18848

[REDACTED]
[REDACTED]
[REDACTED]

Dear [REDACTED]

We are writing with important information regarding a recent security incident. The privacy and security of the personal information we maintain is of the utmost importance to Gannon Associates ("Gannon"). As such, we wanted to provide you with information about the incident, explain the services we are making available to you, and let you know that we continue to take significant measures to protect your information.

What Happened?

On June 14, 2022, Gannon discovered that an unauthorized party may have accessed our network and potentially acquired a limited number of Gannon documents.

What We Are Doing.

Upon learning of this issue, we immediately commenced a prompt and thorough investigation and took steps to contain the incident. As part of our investigation, we engaged external cybersecurity professionals experienced in handling these types of incidents. Though the investigation is ongoing, Gannon determined on June 20, 2022 that the unauthorized party may have removed certain files and folders from the network that contain some of your personal information. Although we have no indication or evidence that any of that information has been misused, we wanted to make you aware of the incident.

What Information Was Involved?

The impacted files contained some of your personal information, specifically your driver's license number and Social Security Number.

What You Can Do.

To date, we are not aware of any reports of identity or financial fraud as a direct result of this incident. However, to protect you from potential misuse of your information, we are providing you with access to Triple Bureau Credit Monitoring* services at no charge. These services provide you with alerts for twenty-four (24) months from the date of enrollment when changes occur to your credit file. In addition, we are providing you with proactive fraud assistance to help with any questions that you might have or in the event that you become a victim of fraud. These services will be provided by CyberScout through Identity Force, a TransUnion company specializing in fraud assistance and remediation services.

To enroll in **Triple Bureau Credit Monitoring¹** services at no charge, please log on to <https://secure.identityforce.com/benefit/gannonassociates> and follow the instructions provided. When prompted please provide the following unique code to receive services: [REDACTED]

You have until [REDACTED] to enroll in these services.

This letter also provides other precautionary measures you can take to protect your personal information, including placing a fraud alert and/or security freeze on your credit files, and/or obtaining a free credit report.

For More Information.

We deeply regret that this incident occurred. We are committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices and internal controls to enhance the security and privacy of your personal information.

If you have any further questions regarding this incident, please call our dedicated and confidential toll-free response line that we have set up to respond to questions at [REDACTED]. This response line is staffed with professionals familiar with this incident and knowledgeable on what you can do to protect against misuse of your information. The response line is available Monday through Friday, from [REDACTED] pm Eastern time, excluding holidays. Representatives are available for [REDACTED].

Sincerely,

Mark Gannon, CEO
Gannon Associates

¹ Services require an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

– OTHER IMPORTANT INFORMATION –

For residents of Iowa: You are advised to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon: You are advised to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of New Mexico: You are advised to review personal account statements and credit reports, as applicable, to detect errors resulting from the security incident. You 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 https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf or see the contact information for the Federal Trade Commission listed below.

For residents of District of Columbia, Maryland, New York, North Carolina, and Rhode Island:

You can obtain information from the District of Columbia, Maryland, North Carolina, New York, and Rhode Island Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft. There were 0 Rhode Island residents notified in this incident.

DC Attorney General
441 4th St NW
Washington, DC 20001
1-202-727-3400
www.oag.dc.gov

**Maryland Office of
Attorney General**
200 St. Paul Pl
Baltimore, MD 21202
1-888-743-0023
www.oag.state.md.us

**New York Attorney
General**
120 Broadway, 3rd Fl
New York, NY 10271
1-800-771-7755
www.ag.ny.gov

**North Carolina
Attorney General**
9001 Mail Service Ctr
Raleigh, NC 27699
1-877-566-7226
www.ncdoj.com

**Rhode Island Office
of Attorney General**
150 South Main St
Providence RI 02903
1-401-274-4400
www.riag.ri.gov

Federal Trade Commission, Consumer Response Center
600 Pennsylvania Ave, NW Washington, DC 20580
1-877-IDTHEFT (438-4338) www.identitytheft.gov

Massachusetts and Rhode Island residents: You have the right to obtain a police report if you are a victim of identity theft.

For residents of all states:

You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at www.consumer.ftc.gov/articles/0155-free-credit-reports) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf), Experian (www.experian.com/fraud/center.html) or Transunion (www.transunion.com/fraud-victim-resource/place-fraud-alert). A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. Initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

Monitoring: You should always remain vigilant for incidents of fraud and identity theft by reviewing payment card account statements and monitoring your credit reports for suspicious or unusual activity.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency by visiting their websites below or by mail. In order to place the security freeze for yourself, your spouse, or a minor under the age of 16, you will need to provide your name, address for the past two years, date of birth, Social Security number, proof of identity and proof of address as requested by the credit reporting company. After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password, which will be required to lift the freeze, which you can do either temporarily or permanently. It is free to place, lift, or remove a security freeze.

Equifax Security Freeze

P.O. Box 105788

Atlanta, GA 30348-5788

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

(888) 298-0045

Experian Security Freeze

P.O. Box 9554

Allen, TX 75013

<http://experian.com/freeze>

(888) 397-3742

TransUnion Security Freeze

P.O. Box 160

Woodlyn, PA 19094

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

(888) 909-8872

For residents of Iowa: You are advised to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon: You are advised to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of New Mexico: You are advised to review personal account statements and credit reports, as applicable, to detect errors resulting from the security incident. You 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 https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf or see the contact information for the Federal Trade Commission listed below.

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DC Attorney General

441 4th St NW

Washington, DC 20001

1-202-727-3400

www.oag.dc.gov

Maryland Office of

Attorney General

200 St. Paul Pl

Baltimore, MD 21202

1-888-743-0023

www.oag.state.md.us

New York Attorney

General

120 Broadway, 3rd Fl

New York, NY 10271

1-800-771-7755

www.ag.ny.gov

North Carolina

Attorney General

9001 Mail Service Ctr

Raleigh, NC 27699

1-877-566-7226

www.ncdoj.com

Rhode Island Office

of Attorney General

150 South Main St

Providence RI 02903

1-401-274-4400

www.riag.ri.gov

Federal Trade Commission, Consumer Response Center

600 Pennsylvania Ave, NW Washington, DC 20580

1-877-IDTHEFT (438-4338) www.identitytheft.gov

Massachusetts and Rhode Island residents: You have the right to obtain a police report if you are a victim of identity theft.

For residents of all states:

You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report

Request Form (available at www.consumer.ftc.gov/articles/0155-free-credit-reports) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf), Experian (www.experian.com/fraud/center.html) or Transunion (www.transunion.com/fraud-victim-resource/place-fraud-alert). A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. Initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

Monitoring: You should always remain vigilant for incidents of fraud and identity theft by reviewing payment card account statements and monitoring your credit reports for suspicious or unusual activity.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency by visiting their websites below or by mail. In order to place the security freeze for yourself, your spouse, or a minor under the age of 16, you will need to provide your name, address for the past two years, date of birth, Social Security number, proof of identity and proof of address as requested by the credit reporting company. After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password, which will be required to lift the freeze, which you can do either temporarily or permanently. It is free to place, lift, or remove a security freeze.

Equifax Security Freeze

P.O. Box 105788

Atlanta, GA 30348-5788

www.experian.com/freeze/center.html

1-800-525-6285

Experian Security Freeze

P.O. Box 9554

Allen, TX 75013-9544

www.experian.com/freeze/center.html

1-888-397-3742

TransUnion Security Freeze

P.O. Box 2000

Chester, PA 19016-2000

www.transunion.com/credit-freeze

1-800-680-7289