

November 1, 2024

VIA E-MAIL - DOJ-CPB@DOJ.NH.GOV

Attorney General John Formella
Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, New Hampshire 03301

Re: Notification of Data Security Incident

Dear Attorney General Formella:

We are writing because True World Holdings LLC and certain of its subsidiaries (collectively “True World”) has learned of a data security incident that affected the personal information of 3 New Hampshire residents.

On August 23, 2024, a True World employee clicked on a phishing email that resulted in a Black Suit ransomware attack. On September 3, 2024, True World learned that Black Suit copied information from certain True World servers that had been encrypted in the incident. True World has begun decrypting the impacted servers and is now in the process of determining what specific information was impacted. However, True World was able to determine that certain employee and former employee data has been compromised.

As a result of the incident, True World has implemented several changes to protect data from any subsequent incidents and taken additional steps to enhance the security of all its IT systems, including engaging third-party forensic investigation consultants.

True World moved promptly to inform affected New Hampshire residents of this data security incident by sending a notification letter to each of these residents via the United States Postal Service on November 1, 2024. The letter includes an offer of complementary credit monitoring services for . A sample notice is attached hereto.

Please do not hesitate to contact me directly if you have any questions.

Very truly,

John T. Wolak



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

NOTICE OF DATA SECURITY INCIDENT

Dear <<first_name>> <<last_name>>,

We are writing to you because True World Holdings LLC and certain of its subsidiaries (collectively, “True World”) recently identified a data security incident that may involve some of your personal information. We are notifying you at this time to make you aware of this security incident so you can understand what happened, what we are doing to address it, and the steps you can take to remain vigilant and enhance the protection of your personal information, including activating complimentary identity monitoring.

What Happened

On August 23, 2024, True World identified unusual activity involving certain systems and servers within its network. Our IT Team immediately launched a comprehensive investigation into the nature and scope of the activity that included retaining an independent forensic investigation consulting team. The investigation is ongoing.

What Information Was Involved

As part of our investigation, we determined that certain files were copied from True World’s network as part of this incident by unauthorized actors. As a result, we have commenced a review and analysis of the files that were copied to determine the specific information that may have been impacted in the incident, including any personal information of True World employees and former employees. This review and analysis is underway and will take additional time to complete. If additional information becomes available about the individuals who may be affected and the specific information that may have been disclosed, we will provide further notices, if necessary, i.e., if we identify additional individuals and personal information that may have been subject to unauthorized access.

Although the analysis and review of the files is ongoing, our investigation to date indicates that certain data has been copied by an unauthorized party, and therefore, is potentially at risk of unauthorized use. The investigation determined that the files that were copied may contain True World employee data including the following personal information that relates to you: <<b2b_text_1 (Data Elements)>>. The information that may have been copied varies by individual.

What We Are Doing

Through this whole challenge, the True World team has continued to deliver fish daily to our customers, taking good care of them. We have restored various systems, and will continue to do so. As part of our ongoing efforts to help prevent something like this from happening in the future, True World has implemented several changes to protect data from any subsequent incidents. Specifically, we are working to identify vulnerabilities in our systems and implement appropriate remedial action.

What You Can Do, and For More Information

As we learn more through the investigation and data review process, we are committed to communicating quickly and appropriately as necessary.

As an ongoing best practice, we recommend that you remain vigilant, including carefully reviewing account statements and credit reports. Out of an abundance of caution, you may wish to change your username, password, and/or security questions relevant to your financial accounts and other personal accounts. Please also review the enclosed “Additional Resources” section included with this letter. This section describes additional steps you can take to help protect yourself, including recommendations by the Federal Trade Commission regarding identity theft protection, details on how to place a fraud alert or a security freeze on your credit file, and other identity theft prevention and mitigation tools and services.

Finally, in the event there is any suspicious activity in any of your accounts or you suspect you are the victim of identity theft, you should promptly notify the financial institution where the account is maintained and report the activity to the proper law enforcement authorities.

Identity Monitoring.

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for 12 months. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until *<<b2b_text_6 (activation deadline)>>* to activate your identity monitoring services.

Membership Number: *<<Membership Number s_n>>*

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

We recommend that you activate your complimentary identity monitoring services. Additional information describing your services is included with this letter.

Your trust in True World is of paramount importance to us. We deeply regret that this incident occurred.

If you have questions, please reach out to the True World call center at (866) 651-9775, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays.

Very truly yours,

President
True World Holdings LLC
24 Link Drive
Rockleigh, New Jersey 07647

ADDITIONAL RESOURCES

Contact information for the three nationwide credit reporting agencies:

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111

Experian, PO Box 2104, Allen, TX 75013, www.experian.com, 1-888-397-3742

TransUnion, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-888-4213

Free Credit Report. It is recommended that you remain vigilant by reviewing account statements and monitoring your credit report for unauthorized activity, especially activity that may indicate fraud and identity theft. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting agencies.

To order your annual 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 from the U.S. Federal Trade Commission's ("FTC") website at www.consumer.ftc.gov) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents: You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

Fraud Alerts. There are two types of fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft and you have the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies.

Security Freeze. You have the ability to place a security freeze, also known as a credit freeze, on your credit report free of charge. 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 may use an online process, an automated telephone line, or submit a written request to any of the three credit reporting agencies listed above. The following information must be included when requesting a security freeze (note that, if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past 5 years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, and display your name, current mailing address, and the date of issue.

Federal Trade Commission and State Attorneys General Offices. If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your home state. You may also contact these agencies for information on how to prevent or minimize the risks of identity theft. You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, www.ftc.gov/bcp/edu/microsites/idtheft/, 1-877-IDTHEFT (438-4338).

For Maryland residents: You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, <https://www.marylandattorneygeneral.gov/>, 1-888-743-0023.

For North Carolina residents: You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov, 1-877-566-7226.

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

For Connecticut residents: You may contact the Connecticut Office of the Attorney General, 165 Capitol Avenue, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag.

For Massachusetts residents: You may contact the Office of the Massachusetts Attorney General, 1 Ashburton Place, Boston, MA 02108, 1-617-727-8400, www.mass.gov/ago/contact-us.html

Reporting of identity theft and obtaining a police report.

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

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

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

**TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES**

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.