



November 18, 2020

Norton Rose Fulbright US LLP  
1301 McKinney, Suite 5100  
Houston, Texas 77010-3095  
United States

**Via Email (SecurityBreach@atg.wa.gov)**

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1125 Washington St SE  
PO Box 40100  
Olympia, WA 98504

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w.ill.daugherty@nortonrosefulbright.com

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*Re: Incident Notification*

Dear Attorney General Ferguson:

I am writing on behalf of my client, Windstream Holdings II, LLC (“Windstream”), to provide notice of a cybersecurity incident.

On August 23, 2020, Windstream became aware that it was a target of a cybersecurity attack. Windstream immediately launched an investigation to determine the scope of the incident, and a cybersecurity firm was engaged to assist. Windstream also notified federal law enforcement of the incident.

The investigation determined that an unauthorized party gained access to certain Windstream internal systems at various times between July 11, 2020 and August 23, 2020. Findings from the investigation indicate that the party may have obtained some internal data from certain Windstream systems during this period. Windstream conducted a thorough review of the internal information to identify individuals whose personal information may have been involved. On October 12, 2020, Windstream completed its review of the data involved and determined that it contained the personal information of Washington residents, including names, dates of birth, driver’s license numbers, Social Security numbers and health-related information.

Today, Windstream will begin sending notification letters via First Class Mail to the 643 Washington residents whose personal information was identified in the data involved. This notice is being provided in accordance with RCW §§ 19.255.010(7). Enclosed are the sample copies of the letters. Windstream is offering two years of complimentary credit monitoring and identity protection services to these individuals. Windstream is also providing a toll-free hotline for the individuals to call with any questions regarding the incident.

To help prevent a similar incident from occurring in the future, Windstream has implemented additional security measures designed to enhance the security of its internal systems and applications. In addition, Windstream continues to support the investigation by federal law enforcement.

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Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,



Will Daugherty  
Partner

Enclosure



P.O. Box 6336  
Portland, OR 97228-6336

<<Mail ID>>  
<<Name 1>>  
<<Name 2>>  
<<Address 1>>  
<<Address 2>>  
<<Address 3>>  
<<Address 4>>  
<<Address 5>>  
<<City>><<State>><<Zip>>  
<<Country>>

<<Date>>

### Notice of Data Breach

<<Name 1>>:

I am reaching out to inform you that Windstream was the target of a cybersecurity attack in late August. We immediately launched an investigation to determine the scope of the incident and a cybersecurity firm was engaged to assist. We also notified federal law enforcement.

#### ***What Happened?***

Our investigation determined that an unauthorized party gained access to certain Windstream internal systems at various times between July 11, 2020 and August 23, 2020. Findings from the investigation indicate that the party may have obtained some internal information from these systems during this period.

#### ***What Information Was Involved?***

Windstream conducted a thorough review of the internal information to identify individuals whose personal information may have been involved. On October 12, 2020, we completed our review and determined that the information involved contained some of your personal information, including your <<Data Elements>>.

#### ***What We Are Doing?***

Safeguarding personal information is a top priority for Windstream, and thus to help prevent a similar incident from occurring in the future, Windstream has implemented additional security measures designed to enhance the security of our internal systems and applications. In addition, Windstream continues to support the investigation by federal law enforcement.

#### ***What You Can Do.***

At this point, we are not aware of any fraud or misuse of any of your personal information as a result of this incident, but we wanted to make you aware of the incident and provide you with additional information on steps you may consider taking.

Please review the “Information about Identity Theft Protection” reference guide, enclosed here, which describes additional steps you may take to help protect your information, including recommendations from the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file.

As an added precaution we are offering a complimentary two-year membership of Experian's® IdentityWorks<sup>SM</sup> Credit 3B. This product provides you with identity detection and assistance in resolving identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you enroll by: <<Enrollment Deadline>> (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your activation code: <<Enrollment Code>>

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks Credit 3B online, please contact Experian's customer care team at 877-890-9332 by <<Enrollment Deadline>>. Be prepared to provide the engagement number <<Engagement Number>> as proof of eligibility for the identity restoration services by Experian.

***For More Information.***

If you have any questions, please call 855-914-4665, Monday through Friday, between 8:00 a.m. and 8:00 p.m. Central Time.

We regret any inconvenience this may have caused.

Sincerely,

A handwritten signature in black ink that reads "Stephen Farkouh". The signature is written in a cursive style with a large, sweeping initial 'S'.

Stephen Farkouh  
Chief Information Officer

### **Additional Details Regarding Experian IdentityWorks Credit 3B Membership**

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B. You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud. Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **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, Equifax and TransUnion files for indicators of 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.

**What you can do to protect your information:** There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration) for this information.

\* 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.

## Information about Identity Theft Protection Guide

Contact information for the three nationwide credit reporting companies is as follows:

Equifax	Experian	TransUnion
Phone: 1-800-685-1111 P.O. Box 740256 Atlanta, Georgia 30348 www.equifax.com	Phone: 1-888-397-3742 P.O. Box 9554 Allen, Texas 75013 www.experian.com	Phone: 1-888-909-8872 P.O. Box 105281 Atlanta, GA 30348-5281 www.transunion.com

**Free Credit Report.** We remind you to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. If you identify any unauthorized charges on your financial account statements, you should immediately report any such charges to your financial institution. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit [www.annualcreditreport.com](http://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](http://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).

**Security Freeze.** Security freezes, also known as credit freezes, restrict access to your credit file, making it harder for identity thieves to open new accounts in your name. You can freeze and unfreeze your credit file for free. You also can get a free freeze for your children who are under 16. And if you are someone's guardian, conservator or have a valid power of attorney, you can get a free freeze for that person, too.

How will these freezes work? Contact all three of the nationwide credit reporting agencies – Equifax, Experian, and TransUnion. If you request a freeze online or by phone, the agency must place the freeze within one business day. If you request a lift of the freeze, the agency must lift it within one hour. If you make your request by mail, the agency must place or lift the freeze within three business days after it gets your request. You also can lift the freeze temporarily without a fee.

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 five 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, display your name and current mailing address, and the date of issue.

**For New Mexico residents:** You may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act. For more information, including information about additional rights, go to [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

**Fraud Alerts.** A fraud alert tells businesses that check your credit that they should check with you before opening a new account. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

**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 avoid 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/](http://www.ftc.gov/bcp/edu/microsites/idtheft/), 1-877-IDTHEFT (438-4338).

**For Connecticut Residents:** You may contact and obtain information from your state attorney general at: Connecticut Attorney General's Office, 55 Elm Street, Hartford, CT 06106, 1-860-808-5318, [www.ct.gov/ag](http://www.ct.gov/ag).

**For District of Columbia Residents:** You may contact the Office of the Attorney General for the District of Columbia, 441 4th Street NW, Suite 1100 South, Washington, D.C. 20001, <https://oag.dc.gov>, 202-442-9828.

**For Maryland Residents:** You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, [www.oag.state.md.us](http://www.oag.state.md.us), 1-888-743-0023. The mailing address for Windstream is 4001 N. Parham Road, Little Rock, Arkansas 72212.

**For New York Residents:** You may contact the New York Department of State Division of Consumer Protection, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and New York State Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>.

**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](http://www.ncdoj.gov), 1-877-566-7226.

**For Rhode Island Residents:** You may contact the Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, <http://www.riag.ri.gov>, 401-274-4400.

**Reporting of identity theft and obtaining a police report.** You have the right to obtain any police report filed in the United States in regard to this incident. If you are the victim of fraud or identity theft, you also have the right to file 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. You also have a right to file a police report and obtain a copy of it.

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

**For Rhode Island residents:** You have the right to file or obtain a police report regarding this incident.



P.O. Box 6336  
Portland, OR 97228-6336

<<Mail ID>>  
<<Name 1>>  
<<Name 2>>  
<<Address 1>>  
<<Address 2>>  
<<Address 3>>  
<<Address 4>>  
<<Address 5>>  
<<City>><<State>><<Zip>>  
<<Country>> <<Date>>

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Sincerely,

Windstream Holdings II, LLC

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**For New Mexico residents:** You may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act. For more information, including information about additional rights, go to [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

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