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NORTON ROSE FULBRIGHT

CONSUMER PROTECTION

September 16, 2022

Norton Rose Fulbright US LLP  
799 9th Street NW  
Suite 1000  
Washington, DC 20001-4501  
United States

**Sent by Certified Mail**

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

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**Re: Legal Notice of Information Security Incident**

Dear Sirs or Madams:

We write on behalf of our client, American Airlines, Inc. ("American") and their subsidiaries Envoy Air and Piedmont Airlines, to inform you of a security incident that may have affected the personal information of approximately 8 New Hampshire residents. At this time, American has no evidence that the potentially affected New Hampshire residents' information has been or will be misused.

On July 5, 2022, American identified unauthorized activity in its Microsoft 365 environment after individuals reported receiving phishing emails from an American employee's account. Further investigation by American's Cyber Security Response Team ("CIRT") revealed certain accounts may have been accessed by an unauthorized actor who used the accounts to send phishing emails. The unauthorized actor may have also previewed certain files on an employee sharepoint site.

Through its investigation, American was able to determine that the unauthorized actor used an IMAP protocol to access the mailboxes. Use of this protocol may have enabled the unauthorized actor to sync the contents of the mailboxes to another device. American has no reason to believe that syncing the contents of the mailboxes was the purpose of the access. Based on the facts, it appears the unauthorized actor was using IMAP protocol as a means to access the mailboxes and send phishing emails.

Notwithstanding, following the forensic investigation, American conducted an extensive eDiscovery exercise to determine whether any personal information was contained in the mailboxes. The review identified personal information in the mailboxes on or around August 16, 2022. The information in the mailboxes may have included name, Social Security number, employee number, date of birth, mailing address, phone number, email address, driver's license number, and/or passport number.

The review also confirmed that the number of documents that contained personal information was small and it would have taken the unauthorized actor significant time and resources to locate the personal information in the mailboxes. Indeed, despite finding this personal information,

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American still had to take numerous steps to confirm individual identities and locate contact information. This included searching internal HR records and engaging Experian to help identify individuals with this fragmented information.

Overall, we believe the risk to individuals is remote. Nonetheless, American will be providing notice to impacted individuals starting on September 16, 2022. Individuals will also receive an Experian product that includes two year membership of Experian's® IdentityWorksSM, which includes an Experian credit report upon signup, triple bureau credit monitoring, identity restoration, and up to \$1 million in identity theft insurance.

American takes this incident seriously and continues to review its security measures, internal controls, and safeguards. American is currently implementing additional safeguards to prevent a similar incident from occurring in the future.

Potentially affected individuals are being notified via a mailed letter on September 16, 2022. A copy of the notification letter, which excludes any identifying information, is included for your reference.

If you have any questions or need further information regarding this incident, please contact me at (202) 340-3435 or [chris.cwalina@nortonrosefulbright.com](mailto:chris.cwalina@nortonrosefulbright.com).

Very truly yours,

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Chris Cwalina

CGC/

Enclosure

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

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APT ABC  
123 ANY STREET  
ANYTOWN, ST 12345-6789



Re: Notice of Security Incident

Dear Sample A. Sample:

We are writing to inform you about a recent incident that involved personal information shared with American Airlines.

**WHAT HAPPENED.** In July 2022 we discovered that an unauthorized actor compromised the email accounts of a limited number of American Airlines team members. Upon discovery of the incident, we secured the applicable email accounts and engaged a third party cybersecurity forensic firm to conduct a forensic investigation to determine the nature and the scope of the incident. Our investigation determined that certain personal information was in the email accounts. We conducted a full eDiscovery exercise and determined that some of your personal information related to your application to or employment with American Airlines, services you provided American Airlines, or information related to benefits you may have received through American Airlines, may have been in the accessed email accounts.

We have no evidence to suggest that your personal information was misused. Nevertheless, out of an abundance of caution, we wanted to provide you with information about the incident and protective measures you can take to protect your information.

**WHAT INFORMATION WAS INVOLVED.** The personal information involved in this incident may have included, where applicable, your name, Social Security number, employee number, date of birth, mailing address, phone number, email address, driver's license number, passport number, airman certification number, military identification number, and/or certain medical information.

**WHAT WE ARE DOING.** We are implementing additional technical safeguards to prevent a similar incident from occurring in the future. While we have no evidence to suggest that your information was misused, out of an abundance of caution, to help protect your identity, we are offering a complimentary two-year membership of Experian's® IdentityWorks<sup>SM</sup>. This product provides you with superior identity detection and resolution of identity theft.

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877.890.9332 by December 31, 2022. Be prepared to provide engagement number B061570 as proof of eligibility for the identity restoration services by Experian. Please see the "Additional Details" section for more information about your IdentityWorks membership.

**WHAT YOU CAN DO.** Although we have no evidence that your personal information has been misused, we recommend that you enroll in Experian's credit monitoring. In addition, you should remain vigilant, including by regularly reviewing your account statements and monitoring free credit

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reports. Please see the enclosed "Additional Information Guide" for additional steps you can take to protect your information.

We regret that this incident occurred and take the security of our employees' personal information very seriously. Please do not hesitate to call our Team Member Customer Service Center at (800) 447-2000 between 7:00 a.m. – 7:00 p.m. (Central) if you have any questions or concerns.

Sincerely,

Russell Hubbard  
Deputy General Counsel  
Chief Privacy and Data Protection Officer

## ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

To help protect your identity, we are offering a complimentary two-year membership of Experian's® IdentityWorks<sup>SM</sup>. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: December 31, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: [www.experianidworks.com/3bplus](http://www.experianidworks.com/3bplus)
- Provide your **activation code**:

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877.890.9332 by **December 31, 2022**. Be prepared to provide engagement number 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, Equifax and Transunion files 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<sup>TM</sup>:** 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<sup>\*\*</sup>:** Provides coverage for certain costs and unauthorized electronic fund transfers.

\* 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.

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 877.890.9332. 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).



## ADDITIONAL INFORMATION GUIDE

Equifax	Experian	TransUnion
Phone: 800-685-1111 P.O. Box 740256 Atlanta, GA 30348 <a href="http://equifax.com">equifax.com</a>	Phone: 888-397-3742 P.O. Box 9554 Allen, TX 75013 <a href="http://experian.com">experian.com</a>	Phone: 888-909-8872 P.O. Box 105281 Atlanta, GA 30348-5281 <a href="http://transunion.com">transunion.com</a>

**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. 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 [annualcreditreport.com](http://annualcreditreport.com) or call toll free at 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 [consumer.ftc.gov](http://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.

Don't confuse freezes with locks. They work in a similar way, but locks may have monthly fees. If you want a free freeze guaranteed by federal law, then opt for a freeze, not a lock.

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 and display your name, current mailing address and 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 Colorado and Illinois residents:** You may obtain information from the credit reporting agencies and the FTC about security freezes.

**Fraud Alerts.** A fraud alert tells businesses that check your credit that they should check with you before opening a new account. As of Sept. 18, 2018, when you place a fraud alert, it will last one year, instead of 90 days. Fraud alerts will still be free and identity theft victims can still get an extended fraud alert for seven years.

**For Colorado and Illinois residents:** You may obtain additional information from the credit reporting agencies and the FTC about fraud alerts.

**FTC and State Attorneys General Offices.** You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself by contacting the consumer reporting agencies, the FTC, or your state Attorney General. The FTC can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; [identitytheft.gov](http://identitytheft.gov); 877-ID-THEFT (877-438-4338); TTY: 866-653-4261. The FTC 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.

**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, 860-808-5318, [ct.gov/ag](http://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, [oag.dc.gov](http://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), 888-743-0023

**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 / 800-697-1220, [dos.ny.gov/consumerprotection](http://dos.ny.gov/consumerprotection); and New York State Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 800-771-7755, [ag.ny.gov](http://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, [ncdoj.gov](http://ncdoj.gov), 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, [riag.ri.gov](http://riag.ri.gov), 401-274-4400

### 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.

**Number of Rhode Island residents affected: 2**

