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COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

JUN 15 2022

CONSUMER PROTECTION

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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

June 9, 2022

VIA U.S. MAIL

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

Re: Notice of R.R. Donnelley & Sons Company Data Security Event

Dear Sir or Madam:

We represent Cetera Financial Group ("CFG") located at 2301 Rosecrans Avenue, Suite 5100, El Segundo, CA 90245, and write to notify your office of a third-party data security event. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, CFG does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

On March 16, 2022, CFG received notice from its third-party printing service provider, R.R. Donnelley & Sons Company ("RRD"), of a data security event that impacted RRD systems. RRD reported that on December 23, 2021, it identified anomalous activity on its network. RRD investigated the activity and determined that between November 29, 2021 and December 23, 2021, RRD systems were accessed by an unknown actor.

Upon receiving notice from RRD, CFG immediately commenced an investigation which included requesting additional information on the event and RRD's investigation. On March 27, 2022, RRD began providing CFG access to files that were present on the impacted RRD systems. RRD continued providing information through June 1, 2022. While CFG is still reviewing this information, on or about May 18, 2022, CFG identified personal information relating to four (4) New Hampshire residents including name, and Social Security number.

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Notice to New Hampshire Residents

On or about June 9, 2022, RRD, on behalf of CFG, began providing written notice of this incident to four (4) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Although CFG continues to take steps to understand the impact the RRD event has on CFG and its affiliates, as part of its ongoing commitment to data security, CFG is reviewing its policies and procedures regarding third-party vendors, data transfers, and working with RRD to evaluate additional measures and safeguards in response to this incident.

Complimentary credit monitoring services for one (1) year, through Experian, is being offered to individuals whose personal information was potentially affected by the RRD event. These individuals are also being provided with guidance on how to better protect against identity theft and fraud. Additionally, CFG is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

CFG is providing written notice of this incident to relevant regulators, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4799.

Very truly yours,

Sian M. Schafle of
MULLEN COUGHLIN LLC

SMS/ajl
Enclosure

EXHIBIT A

Cetera Financial Group
PO Box 474
Monroe, WI 53566



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6/7/22

Dear

Cetera Financial Group, Inc. ("CFG") is writing to inform you that you may have been affected by a data security event that took place at R. R. Donnelley & Sons Company ("RRD"). RRD is a third-party printing service provider utilized by CFG and its affiliates for printing client letters and brochures. Although this event did not affect our systems, we wanted to provide you with information on the RRD event and the resources available to you to help protect your information, should you feel it appropriate to do so.

What Happened? On or about March 16, 2022, RRD notified CFG of a data security event that impacted RRD systems. RRD reported that on December 23, 2021, it identified anomalous activity on its network. RRD investigated the activity and determined that between November 29, 2021 and December 23, 2021, RRD systems were accessed by an unknown actor.

Upon receiving notice from RRD, CFG immediately commenced an investigation which included requesting additional information on the event and RRD's investigation to determine the impact on CFG. On March 27, 2022, RRD began providing CFG access to its files that were present on the impacted RRD systems. RRD continued providing information through June 1, 2022. While CFG is still reviewing this information, on or around May 18, 2022, we determined that sensitive information identified during our review required notification based on the facts known to date.





What Information Was Involved? The following types of sensitive information relating to you were present in the files provided by RRD: name and account number.

What We Are Doing. We take the confidentiality, privacy, and security of personal information very seriously. After receiving notice from RRD, we took steps to understand the impact the RRD event had on client data. As part of our ongoing commitment to data security, CFG is reviewing its policies and procedures regarding third-party vendors, data transfers, and is working with RRD to evaluate additional measures and safeguards in response to this incident. As an added precaution, we arranged to provide credit monitoring services for 12 months at no cost to you.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud and to review your account statements over the next 12 to 24 months and free credit reports for suspicious activity and to detect errors. We also recommend you review the "Steps You Can Take to Help Protect Personal Information" section of this letter. Further, you may enroll in the offered complimentary credit monitoring services.

For More Information. If you have additional questions, please call (877) 890-9162, Monday through Friday from 8am - 10pm CST, Saturday and Sunday 10 am - 7 pm CST (excluding major U.S. holidays). You may also write to us at: Cetera Financial Group, Attn: Legal, 2301 Rosecrans Ave., Suite 5100, El Segundo, CA 90245.

We sincerely regret any inconvenience or concern this event may have caused.

Sincerely,

Deidre Link

Chief Privacy Officer and Chief Counsel

Steps You Can Take to Help Protect Personal Information

Enroll in Monitoring Services

We have arranged for you to enroll, at your option, in a 12 month membership of Experian's® IdentityWorksSM at no cost to you. This product provides you with 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: 9/30/2022 (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- 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) 890-9162 by 9/30/2022. Be prepared to provide your engagement number as proof of eligibility for the identity restoration services by Experian.

For additional details on Experian's IdentityWorks membership, please see the enclosed instruction sheet "Additional details regarding your Experian IdentityWorks Membership."

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 1-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 security freeze, you will need to provide 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 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
888-298-0045	1-888-397-3742	833-395-6938
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

We also recommend you review your account statements from the past 7 months. If unauthorized activity is detected, notify law enforcement and the relevant financial institution. 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; 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 www.oag.state.md.us.

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-fcra.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; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are six (6) Rhode Island residents impacted by this incident.