

RECEIVED

JUN 20 2023

CONSUMER PROTECTION



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

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

June 9, 2023

VIA U.S. MAIL

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

Re: Notice of Data Event

To Whom It May Concern:

We represent Channel Building Company, Inc. ("Channel") located at 355 Middlesex Avenue Wilmington, MA 01887, and are writing to notify your office of an event that may affect the security of certain personal information relating to eleven (11) New Hampshire residents. This notice may be supplemented if new significant facts are learned subsequent to its submission. By providing this notice, Channel 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 or around May 2, 2023, Channel learned that certain employee payroll information was changed in its benefits platform, Zenefits, by an unknown actor. Channel had its employees reset their passwords and the activity has now ended. Channel was unable to confirm whether other employees whose information was stored in Zenefits was accessed by the unknown actor, however, in an abundance of caution, Channel notified all employees that their information may have been accessed by the unknown actor. Channel provided preliminary notice to its employees on May 2, 2023, May 3, 2023 and May 11, 2023 but is now providing formal notice to its employees. Please note, the May 11, 2023 notice contained enrollment information for 24 months of credit monitoring.

The information that could have been subject to unauthorized access includes

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Notice to New Hampshire Residents

On or about June 9, 2023, Channel provided written notice of this event to eleven (11) 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

Upon learning the event, Channel moved quickly to investigate and respond to the event, and attempted to gain additional information from Zenefits. Zenefits did not provide the requested information so Channel provided notice in an abundance of caution to all employees. Channel is providing access to credit monitoring services for _____ years, through TransUnion, to individuals whose personal information was potentially affected by this event, at no cost to these individuals.

Additionally, Channel is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Channel 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.

Channel is providing written notice of this event to relevant state regulators, as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at _____.

Very truly yours,

Brittany R. Bickel of
MULLEN COUGHLIN LLC

BRB/jrm
Enclosure

EXHIBIT A

CHANNEL

355 Middlesex Avenue
Wilmington, MA 01887

<<Name 1>> <<Name 2>>

<<Address 1>>

<<Address 2>>

<<City>>, <<State>> <<Zip>>

<<Date>>

Dear <<Name 1>> <<Name 2>>:

Channel Building Company, Inc. ("Channel") is providing notice of an event that may affect the security of some of your information. We are providing you with information about the event, our response, and additional measures you can take to help protect your information, should you feel it appropriate to do so.

On or around May 2, 2023, Channel learned that certain employee payroll information was changed in the benefits platform, Zenefits, by an unknown actor. We provided you with previous notices of this event; however, this will be our final notice. The following data is accessible through the Zenefits platform:

We take this event and the security of information in our care seriously. Upon learning of this event, we promptly took steps to investigate and respond, assess the security of our systems, and notify potentially affected individuals.

We offered you access to of complimentary credit monitoring and identity restoration services through TransUnion. Details of this offer and instructions on how to activate these services are enclosed with this letter. **This information is being provided again for ease of reference. If you have already enrolled, you do not need to enroll again.**

We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. Please also review the enclosed *Steps You Can Take to Protect Personal Information*, which contains information on what you can do to safeguard against possible misuse of your information. You can also enroll in the credit monitoring services that we offered.

As provided via email, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies.

To enroll in this service, go directly to the and in the space referenced as "Enter Activation Code", enter the following unique 12-letter Activation Code **<<Insert Unique 12-letter Activation Code>>** and follow the three steps to receive your credit monitoring service online within minutes.

If you do not have access to the internet and wish to enroll in a similar offline, paper based, credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at 2. When prompted, enter the following 6-digit telephone pass code and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

Once you are enrolled, you will be able to obtain 24 months of unlimited access to your TransUnion credit report and VantageScore® credit score by TransUnion. The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The service also includes the ability to lock and unlock your TransUnion credit report online, access to identity restoration services that provides assistance in the event your identity is compromised to help you restore your identity and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

You can sign up for the *myTrueIdentity* online Credit Monitoring service anytime between now and **August 31, 2023**. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have credit file at TransUnion, or an address in the United States (or its territories) and a valid Social Security number, or are under the age of 18. Enrolling in this service will not affect your credit score.

If you have questions about your *myTrueIdentity* online credit monitoring benefits, need help with your online enrollment, or need help accessing your credit report, or passing identity verification, please contact the *myTrueIdentity* Customer Service Team toll-free at: 1-844-787-4607, Monday-Friday: 8am- 9pm, Saturday-Sunday: 8am-5pm Eastern time.

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 may need to provide the following information, depending on whether you make the request online, by phone, or by mail:

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.);
7. Social Security Card, pay stub, or W2;
8. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning 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
1-888-298-0045	1-888-397-3742	1-800-916-8800
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

Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

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.

If you have additional questions, you may call [number] Monday through Friday from 9:00 am to 5:00 pm Eastern (excluding U.S. holidays). You may also write to Channel at 355 Middlesex Avenue Wilmington, MA 01887.

Sincerely,

Annette Carroll
Chief People Officer
Channel Building Company

NH DEPT OF JUSTICE
JUN 20 23 PM 3:52