



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

NOV 07 2022

CONSUMER PROTECTION

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

November 3, 2022

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

Dear Sir or Madam:

We represent Club Quarters Management Company, LLC ("Club Quarters") located at 333 Ludlow Street, Stamford, CT 06902, and are writing to notify your office of an incident that may affect the security of certain personal information relating to two (2) New Hampshire residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Club Quarters 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 August 30, 2022, Club Quarters identified suspicious activity on certain systems. Club Quarters moved quickly to investigate the activity and to confirm the security of its network. The investigation determined that there was unauthorized access to the network between August 17, 2022 and September 2, 2022, and during that time an unauthorized actor copied certain files. Club Quarters is reviewing the involved systems for personal information and are notifying individuals as information becomes available. On or around October 18, 2022, Club Quarters determined that the involved systems contained the name and Social Security number of two (2) New Hampshire residents.

Notice to New Hampshire Residents

On or about November 3, 2022, Club Quarters provided written notice of this incident to two (2) 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 discovering the event, Club Quarters moved quickly to investigate and respond to the incident, assess the security of Club Quarters systems, and identify potentially affected individuals. Further, Club Quarters notified federal law enforcement regarding the event. Club Quarters is also working to implement additional safeguards and training to its employees. Club Quarters is providing access to credit monitoring services for twelve (12) months, through Experian to the notified New Hampshire residents.

Additionally, Club Quarters is providing notice recipient with guidance on how to better protect against identity theft and fraud. Club Quarters 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.

Club Quarters is providing written notice of this incident to relevant regulators.

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/jlm
Enclosure

EXHIBIT A



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

November 3, 2022



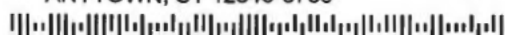
i5482-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345

SAMPLE A SAMPLE - L01 ADULT

APT ABC

123 ANY STREET

ANYTOWN, ST 12345-6789



[Extra1]

Dear Sample A. Sample:

Club Quarters Management Company, LLC ("Club Quarters") writes to inform you of an incident that may affect the security of some of your information. This letter provides an overview of the incident, our response, and steps you may take to better protect your information, should you wish to do so.

What Happened? On August 30, 2022, Club Quarters identified suspicious activity on certain systems. We moved quickly to investigate the activity and to confirm the security of our network. The investigation determined that there was unauthorized access to the network between August 17, 2022, and September 2, 2022, and during that time an unauthorized actor copied certain files. We reviewed the involved systems for personal information and are notifying individuals as information becomes available. On or around October 24, 2022, we determined that the involved systems contained some of your personal information.

What Information Was Involved? The investigation determined that the involved systems contained information including your [Extra2] and name.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and credit reports for suspicious activity and to report any suspicious activity promptly to your bank or financial institution. Additional information and resources are included in the enclosed *Steps You Can Take To Protect Personal Information*. You may also enroll in the complimentary credit monitoring services available to you. Enrollment instructions are attached to this letter.

What We Are Doing. Club Quarters takes the confidentiality, privacy, and security of information in its care very seriously. Upon discovery of the incident, we took immediate steps to secure the network and investigate the incident. As part of our ongoing commitment to the privacy of information in our care, we reviewed our existing policies and procedures and implemented additional administrative and technical safeguards. Additionally, we reported this incident to federal law enforcement.

While we are unaware of any fraudulent misuse of your information as a result of this event, as an additional precaution, Club Quarters is offering you access to ## complimentary credit monitoring and identity restoration services through Experian. Details of this offer and instructions on how to activate these services are enclosed with this letter.

What You Can Do. 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. You may also review the information contained in the enclosed document, *Steps You Can Take to Help Protect Your Information*. Further, you may enroll in the complimentary credit monitoring services we are offering to you. Although we are making these services available to you, we are unable to enroll you directly.

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ENGAGE#

i5482-L01

For More Information. If you have question, please call 1-833-281-4832. This line is available Monday through Friday from 9:00 am ET to 11:00 pm ET and on Saturday through Sunday from 11:00 am ET to 8:00 pm ET (excluding U.S. holidays). You may also write to Club Quarters at 333 Ludlow Street, Stamford, CT 06902.

Sincerely,

John Paul Nichols
President & CEO
Club Quarters Management Company, LLC

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorks® IdentityWorksSM for ## months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. 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 from the date of the incident (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).

Please note that Identity Restoration is available to you for ## months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary ##-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll** by January 26, 2023 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your **activation code**: **ABCDEFGHI**

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 1-833-281-4832 by January 26, 2023. Be prepared to provide engagement number ENGAGE# as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR ##-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.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related 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.

* 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.



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 one-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 credit freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
1. Social Security number;
2. Date of birth;
3. Addresses for the prior two to five years;
4. Proof of current address, such as a current utility bill or telephone bill;
5. A legible photocopy of a government-issued identification card (state driver's license or ID card, etc.); and
6. 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

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. Club Quarters is located at 333 Ludlow Street, Stamford, CT 06902.

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 2 Rhode Island residents impacted by this incident.

