



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

APR 27 2023

CONSUMER PROTECTION

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

April 21, 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 Drummond Woodsum & MacMahon, PA ("DWM") located at 84 Marginal Way, Suite 600, Portland, ME 04101, and write to notify your office of an incident that may affect the security of certain personal information relating to four (4) New Hampshire residents. By providing this notice, DWM 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 February 2, 2023, DWM became aware of suspicious activity related to an employee email account. DWM immediately took steps to secure their email environment and launched an investigation with third-party specialists to determine the nature and scope of the activity. The forensic examiners' investigation determined there was unauthorized access to one employee's email account between January 30, 2023 and February 2, 2023. However, the investigation was unable to determine whether any specific emails or attachments were viewed in the accounts. DWM, with the assistance of the third-party specialists, undertook an in-depth, lengthy, and labor-intensive process to identify whether sensitive information may have been contained in the email account, and identify the individuals whose information may have been impacted for purposes of providing notice. By April 4, 2023 this time-intensive and exhaustive review determined that information related to certain individuals was present in the email account. The information that could have been subject to unauthorized access includes

Notice to New Hampshire Residents

On or about April 21, 2023, DWM provided 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

Upon discovering the event, DWM moved quickly to investigate and respond to the incident, assess the security of DWM systems, and identify potentially affected individuals. DWM is also working to implement additional safeguards and training to its employees. DWM is providing access to credit monitoring services for twenty-four (24) months, through Experian IdentityWorks, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, DWM is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud. DWM 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. DWM also notified other 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,

Richard Aponte-Boyd of
MULLEN COUGHLIN LLC

RAB/klh
Enclosure

EXHIBIT A

April 21, 2023

**Re: Notice of Security Incident**

Dear :

Drummond Woodsum & MacMahon, P.A. ("DWM") writes to notify you of a recent incident that may affect the security of some of your personal information. This letter provides you with information about the incident, our response thus far, and steps you may take to better protect your information, should you feel it appropriate to do so. The confidentiality, privacy, and security of information in DWM's care is one of our highest priorities. While we do not currently have any evidence of misuse of your information, we nonetheless want to keep you informed and this letter provides steps you may take to better protect your information, should you feel it is appropriate to do so.

What Happened? On February 2, 2023, DWM became aware of suspicious activity related to certain employee email account. We immediately took steps to secure our email environment and launched an investigation with third-party specialists to determine the nature and scope of the activity. The investigation determined there was unauthorized access to one employee's email account between January 30, 2023 and February 2, 2023. However, the forensic examiners' investigation was unable to determine whether any specific emails or attachments were viewed in the account. DWM, with the assistance of the third-party specialists, undertook an in-depth, lengthy, and labor-intensive process to identify whether sensitive information may have been contained in the email account, and to identify the individuals whose personal information may have been impacted for purposes of providing notice. By April 4, 2023, this time-intensive and exhaustive review determined that personal information related to certain individuals was present in the email account. We are notifying you because our review determined that personal information related to you was present in the employee email account.

What Information Was Involved? The following personal information was present in the email account and may have been subject to unauthorized access:

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What We Are Doing. We take this incident and the security of client information within our care very seriously. In addition to the steps described above, as part of our ongoing commitment to the privacy of personal information in our care, we are undertaking a review of our existing policies, procedures, and training programs and are looking into implementing additional safeguards to further secure the information in our systems.

As an added precaution, we are also offering you access to 24 months of complimentary credit monitoring, fraud consultation, and identity theft restoration services. Individuals who wish to receive these services must enroll by following the attached enrollment instructions.

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 over the next twelve (12) to twenty-four (24) months. You can find out more about how to protect against potential identity theft and fraud in the enclosed *Steps You Can Take to Help Protect Your Information*. There you will also find more information on the credit monitoring services we are offering and how to enroll.

For More Information. We understand that you may have questions that are not addressed in this notice. If you have additional questions or concerns, please contact us at .1.

We apologize for any inconvenience or concern this incident causes you.

Sincerely,

George T. Dilworth
Managing Director
Drummond Woodsum & MacMahon, PA

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit Monitoring and Identity Restoration Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 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 24 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 24-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** (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 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 _____ by _____

3. 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 file 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 security 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 fraud alert or 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

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, D.C. 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

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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.