



Doherty Wallace Pillsbury & Murphy P.C.

March 20, 2020

VIA: Email ([doj-cpb@doj.nh.gov](mailto:doj-cpb@doj.nh.gov))

New Hampshire Department of Justice  
Gordon J. MacDonald, Attorney General  
33 Capitol Street  
Concord, NH 03301

RE: Notice of Security Breach

Dear Attorney General MacDonald:

This firm represents Family Ford, Inc. (d/b/a Family Ford of Enfield, Inc.) and I am writing to notify you in accordance with N.H. Rev. Stat. § 359-C:20 *et seq.*, to notify you of a data security incident involving one (1) New Hampshire resident.

#### **IDENTIFICATION OF PARTIES**

The affected organization is Family Ford, Inc. (d/b/a Family Ford of Enfield, Inc.) (the “Company”), a vehicle dealership with a principal office and retail location at 65 Hazard Avenue, Enfield, Connecticut. The Company is unable to identify the person responsible for the incident because it is the result of theft, as described in further detail below.

#### **NATURE OF THE DATA SECURITY INCIDENT**

In the process of moving the Company’s temporary offices into its newly renovated space, the Company transported certain customer records, described herein, in a Company-owned vehicle (the “Vehicle”). The records at issue were intended to be kept in the Vehicle only on a temporary basis until they could be fully transferred to the renovated offices. On or around February 5, 2020, a Company employee discovered that the Vehicle was stolen. The Vehicle was stolen from the Company’s location at 65 Hazard Avenue, Enfield, Connecticut. The Vehicle contained customer records of customers who purchased one or more vehicles from the Company during the 2019 calendar year. The records included customers’ names and the following categories of customer information: customer name, address, email address, telephone number, driver’s license number, and, in some cases, a social security number (collectively, the “Customer Information”). The Customer Information was in paper form. The Company’s usual practice is to lock all Company-owned vehicles, and it believes that this Vehicle was locked.

**Rebecca Thibault** Direct **413-233-9528** [rthibault@dwpm.com](mailto:rthibault@dwpm.com)

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At this time, the Company is not aware of any fraud or misuse of the Customer Information.

#### **NUMBER OF NEW HAMPSHIRE RESIDENTS AFFECTED**

As of the date of this Notice, the Company believes that the Customer Information consisted of information from one (1) individual residing in New Hampshire. The New Hampshire resident whose Customer Information was believed to have been stolen is receiving notice of this incident by direct U.S. mail on or around March 24, 2020 (the "Resident Notice"). A copy of a sample Resident Notice is included with this Notice.

#### **REMEDIAL STEPS COMPANY HAS TAKEN OR PLANS TO TAKE RELATING TO THE INCIDENT**

Upon discovery of the theft of the Vehicle, the Company contacted the Enfield Police Department to report the theft. An officer responded and a police report was filed. The Company is providing any assistance requested by law enforcement to try and recover the Vehicle. Again, at this time, the Company is not aware of any use of the Customer Information for fraudulent purposes.

As a result of this incident, the Company has taken additional remedial steps to protect customer information. It has directed relevant employees that customer information must be appropriately secured when it is being transported outside of Company premises. This includes a removing customer information from vehicles upon reaching the destination.

#### **MANDATORY CREDIT MONITORING**

The Company has offered all affected customers, whether or not their social security numbers were stolen, the opportunity to enroll in credit monitoring services, free of charge, for at least twenty-four (24) months. The credit monitoring services are being provided by NortonLifeLock, and include the monitoring services specified on the enclosure to the Resident Notice. Customers have ninety (90) days to sign up for the credit monitoring services. Instructions for enrolling in the free credit monitoring services were included in Resident Notice.

#### **CONTACT INFORMATION**

If you have any questions or need further information about this incident, please contact me.

Sincerely,

/s/ Rebecca Thibault

Rebecca M. Thibault, Esq.

Attachment  
Cc: Family Ford of Enfield, Inc.



March 24, 2020

4 1 671 \*\*\*\*\*AUTO\*\*ALL FOR AADC 060

John Doe  
123 Anystreet Dr  
Anytown, NY 12345



Dear John Doe:

We value your business and respect the privacy of our customers' information. Accordingly, as a precautionary measure, we are writing to notify you that there was a theft of customer information maintained by Family Ford of Enfield, Inc. that involved your personal information and occurred on or around February 5, 2020. We had collected your personal information in connection with your purchase of a vehicle from us in 2019. This notification is being sent pursuant to state law.<sup>1</sup>

The personal information that was subject to this data breach were records that were in paper format. These records were being transferred from our temporary office location to our newly renovated offices in a company-owned vehicle. This vehicle was stolen and we reported the theft promptly upon its discovery on February 5, 2020 to the Enfield Connecticut Police Department. The stolen records included your name and included at least one or more of the following personal information elements: your social security number; driver's license number or non-driver identification card number; and/or account, credit or debit card number.

The information involved in this incident included social security numbers. We are therefore offering you the opportunity to enroll in free credit monitoring services for twenty-four (24) months. To enroll in the free credit monitoring service, please see the enclosed instructions.

To protect yourself from the possibility of identity theft, we recommend that you immediately place a fraud alert on your credit files. A fraud alert conveys a special message to anyone requesting your credit report that you suspect you were a victim of fraud. When you or someone else attempts to open a credit account in your name, the lender should take measures to verify that you have authorized the request. A fraud alert should not stop you from using your existing credit cards or other accounts, but it may slow down your ability to get new credit. An initial fraud alert is valid for ninety (90) days. To place a fraud alert on your credit reports, contact one of the three major credit reporting agencies at the appropriate number or via their website, listed below:

Equifax (888)766-0008 or  
[www.fraudalert.equifax.com](http://www.fraudalert.equifax.com)

Experian (888) 397-3742 or  
[www.experian.com](http://www.experian.com)

TransUnion (800) 680-7289 or  
[www.transunion.com](http://www.transunion.com)

<sup>1</sup> **Connecticut** (C.G.S. § 36a-701b); **Florida** (Fla. Stat. § 501.171); **Maine** (Maine Revised Statutes, Title 10, chapter 210-B, section 1347); **Michigan** (M.C.L.A § 445 et seq., (the Michigan Identity Theft Protection Act)); **New Hampshire** (N.H. Rev. Stat. § 359-C:20 et seq.); **New Jersey** (N.J. Stat. § 56:8-163); **New York** (New York State Information and Security Breach Notification Act (General Business Law § 899-11 or State Technology Law § 208)).

One agency will notify the other two on your behalf. You will then receive letters from the agencies with instructions on how to obtain a free copy of your credit report from each.

You may also place a security freeze on your credit reports, free of charge. A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without written authorization, and therefore restricts the opening of unauthorized accounts. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services. Under federal law, you cannot be charged to place, lift, or remove a security freeze.

You must place your request for a freeze with each of the three major consumer reporting agencies. To place a security freeze on your credit report, you may (i) send a written request by regular, certified or overnight mail at the addresses below, or (ii) do so through each of the consumer reporting agencies' websites or over the phone, using the contact information below:

**Equifax Security Freeze**

P.O. Box 105788

Atlanta, GA 30348

1-800-349-9960

<https://www.equifax.com/personal/credit-report-services/>

**Experian Security Freeze**

P.O. Box 9554

Allen, TX 75013

1-888-397-3742

<https://www.experian.com/freeze/center.html>

**TransUnion Security Freeze**

P.O. Box 160

Woodlyn, PA 19094

1-888-909-8872

<https://www.transunion.com/credit-freeze>

In order to request a security freeze, you will need to provide some or all of the following information to the credit reporting agency, depending on whether you do so online, by phone, or by mail: (1) Your full name (including middle initial as well as Jr., Sr., II, III, etc.); (2) Social Security Number; (3) Date of birth; (4) The addresses where you have lived over the past five (5) years; (5) Proof of current address; (6) A legible photocopy of a government issued identification card; (7) Social Security Card, pay stub, or W2; and (8) If you are a victim of identity theft, include a copy of the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

The credit reporting agencies have one (1) to three (3) business days after receiving your request to place a security freeze on your credit report, based upon the method of your request. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with a unique personal identification number (PIN) or password (or both) that can be used by you to authorize the removal or lifting of the security freeze. It is important to maintain this PIN/password in a secure place, as you will need it to lift or remove the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report or to remove the security freeze you must make a request to each of the credit reporting agencies by mail, through their website, or by phone (using the contact information above). You must provide proper identification (including name, address, and social security number) and the PIN number or password provided to you when you placed the security freeze, as well as the identities of those entities or individuals you would like to receive your credit report. You may also temporarily lift a security freeze for a specified period of time rather than for a specific entity or individual, using the same contact information above. The credit bureaus have between one (1) hour (for request made online) and three (3) business days (for request made by mail) after receiving your request to lift the security freeze for those identified entities or for the specified period of time, or to remove the

security freeze.

You may also want to take additional steps to protect yourself from identity theft or other fraud. These include the following: (i) reviewing your credit reports for unexplained activity; and (ii) reviewing credit card or other financial accounts for any suspicious and/or unauthorized activity. You may obtain a free copy of your credit report once every 12 months by visiting [www.annualcreditreport.com](http://www.annualcreditreport.com), calling toll free 877-322-8228, or by completing an Annual Credit Request Form online at: [www.ftc.gov/bcp/menus/consumer/credit/rights.shtm](http://www.ftc.gov/bcp/menus/consumer/credit/rights.shtm) and mailing it to: Annual Credit Report Request Service, P.O. Box 1025281, Atlanta, GA 30348-5283.

When you receive a credit report from each agency, review the reports carefully. Look for accounts you did not open, inquiries from creditors that you did not initiate, and confirm that your personal information, such as home address and Social Security number, is accurate. If you see anything you do not understand or recognize, call the credit reporting agency at the telephone number on the report. You may also call your local police department and file a report of identity theft. Get and keep a copy of the police report because you may need to give copies to creditors to clear up your records or to access transaction records.

Even if you do not find signs of fraud on your credit reports, we recommend that you remain vigilant in reviewing your credit reports from the three major credit reporting agencies. For more information on identity theft, you can visit the website of your state's offices<sup>2</sup> or the Federal Trade Commission's website at [www.ftc.gov/bcp/edu/microsites/idtheft/](http://www.ftc.gov/bcp/edu/microsites/idtheft/). The steps we recommend you take in this letter are not comprehensive and there may be other things you wish to do to protect yourself and your identity.

Family Ford of Enfield values your business and your privacy and we are working closely with law enforcement to address the incident. If you have any questions about this incident or about enrolling in the free credit monitoring service, please contact (866) 774-2193.

Sincerely,



Jacqueline Gordon, Controller

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<sup>2</sup> Office of the Connecticut Attorney General at: <https://portal.ct.gov/AG/Consumer-Issues/Identity-Theft/Identity-Theft> (Connecticut residents);

Office of the Florida Attorney General at: <http://myfloridalegal.com/identitytheft> (Florida residents);

Office of the Maine Attorney General at: [https://www.maine.gov/ag/consumer/identity\\_theft/index.shtml](https://www.maine.gov/ag/consumer/identity_theft/index.shtml) (Maine residents);

Michigan Department of Attorney General at: [https://www.michigan.gov/ag/0,4534,7-359-81903\\_20942\\_30997-487726--,00.html](https://www.michigan.gov/ag/0,4534,7-359-81903_20942_30997-487726--,00.html) (Michigan residents);

New Jersey Office of Homeland Security & Preparedness, NJ Cybersecurity & Communications Integration Cell Division at: <https://www.cyber.nj.gov/identity-theft/> (New Jersey residents);

Office of the New Hampshire Attorney General Consumer Protection Bureau at: <https://www.doj.nh.gov/consumer/identity-theft/index.htm> (New Hampshire residents); or

NYS Attorney General at: <http://www.ag.ny.gov/home.html> or the New York Dept. of State Div. of Consumer Protection at: <http://www.dos.ny.gov/consumerprotection> (New York residents).

## **COMPLIMENTARY CREDIT MONITORING ENROLLMENT INSTRUCTIONS**

Family Ford of Enfield has retained **NortonLifeLock** to provide two (2) years of complimentary **LifeLock Defender™ Choice** identity theft protection.

**To activate your membership online and get protection at no cost to you:**

1. In your web browser, go directly to **www.LifeLock.com**. Click on the yellow **"START MEMBERSHIP"** button (*do not attempt registration from a link presented by a search engine*).
2. You will be taken to another page where, below the FOUR protection plan boxes, you may enter the **Promo Code:** [REDACTED] and click the **"APPLY"** button.
3. On the next screen, enter your **Member ID:** [REDACTED] and click the **"APPLY"** button.
4. Your complimentary offer is presented. Click the red **"START YOUR MEMBERSHIP"** button.
5. Once enrollment is completed, you will receive a confirmation email (*be sure to follow ALL directions in this email*).

**Alternatively, to activate your membership over the phone, please call: (866) 774-2193.**

**You will have until June 30<sup>th</sup>, 2020 to enroll in this service.**

Once you have completed the LifeLock enrollment process, the service will be in effect. Your **LifeLock Defender™ Choice** membership includes:

- ✓ Primary Identity Alert System<sup>†</sup>
- ✓ 24/7 Live Member Support
- ✓ Dark Web Monitoring<sup>\*\*</sup>
- ✓ Norton™ Security Deluxe<sup>2</sup> (90 Day Free Subscription)
- ✓ Stolen Funds Reimbursement up to \$25,000 <sup>†††</sup>
- ✓ Personal Expense Compensation up to \$25,000 <sup>†††</sup>
- ✓ Coverage for Lawyers and Experts up to \$1 million <sup>†††</sup>
- ✓ U.S.-Based Identity Restoration Team
- ✓ One-Bureau Credit Monitoring<sup>1\*\*</sup>
- ✓ Annual One-Bureau Credit Report & Credit Score<sup>1\*\*</sup>

The credit score provided is a VantageScore 3.0 credit score based on Equifax data. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your creditworthiness.

<sup>1</sup> If your plan includes credit reports, scores, and/or credit monitoring features ("Credit Features"), two requirements must be met to receive said features: (i) your identity must be successfully verified with Equifax; and (ii) Equifax must be able to locate your credit file and it must contain sufficient credit history information. IF EITHER OF THE FOREGOING REQUIREMENTS ARE NOT MET YOU WILL NOT RECEIVE CREDIT FEATURES FROM ANY BUREAU. If your plan also includes Credit Features from Experian and/or TransUnion, the above verification process must also be successfully completed with Experian and/or TransUnion, as applicable. If verification is successfully completed with Equifax, but not with Experian and/or TransUnion, as applicable, you will not receive Credit Features from such bureau(s) until the verification process is successfully completed and until then you will only receive Credit Features from Equifax. Any credit monitoring from Experian and TransUnion will take several days to begin after your successful plan enrollment. No one can prevent all identity theft or cybercrime. <sup>†</sup> LifeLock does not monitor all transactions at all businesses.

<sup>2</sup> Norton Security Online provides protection against viruses, spyware, malware, and other online threats for up to 5 PCs, Macs, Android devices. Norton account features not supported in this edition of Norton Security Online. As a result, some mobile features for Android are not available such as anti-theft and mobile contacts backup. iOS is not supported.

<sup>\*\*</sup> These features are not enabled upon enrollment. Member must take action to get their protection.

<sup>†††</sup> Reimbursement and Expense Compensation, each with limits of up to \$25,000 for Defender Choice. And up to \$1 million for coverage for lawyers and experts if needed, for all plans. Benefits provided by Master Policy issued by United Specialty Insurance Company (State National Insurance Company, Inc. for NY State members). Policy terms, conditions and exclusions at: LifeLock.com/legal.