



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

MAY 31 2022

CONSUMER PROTECTION

Alexandria N. Murphy
Office: (267) 930-1345
Fax: (267) 930-4771
Email: amurphy@mullen.law

40 Burton Hills Boulevard, Suite 200
Nashville, TN 37215

May 27, 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 Franklin International ("Franklin"), located at 2020 Bruck Street, Columbus, OH 43207, 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. We reserve the right to supplement this notice with any new significant facts learned subsequent to its submission. By providing this notice, Franklin 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 about October 19, 2021, Franklin discovered that certain computer systems in its environment were inaccessible. Franklin immediately took steps to mitigate the impact of the incident and launched an investigation to determine the full nature and scope of the event. Through this investigation, Franklin determined that an unknown actor gained access to certain Franklin systems between October 18, 2021 and October 19, 2021, and that certain files on those systems were viewed and/or taken by the unknown actor. Franklin thereafter worked with specialists to conduct a comprehensive review of the impacted data to determine if there was personal information contained therein, and, if so, to whom it related. Once complete, Franklin worked to confirm the identities and contact information for individuals and entities to provide notifications. This review was recently completed on May 9, 2022.

The information that could have been subject to unauthorized access includes name, Social Security number, bank account number, and routing number.

Mullen.law

Notice to New Hampshire Residents

On or about May 27, 2022 Franklin 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, Franklin moved quickly to investigate and respond to the incident, assess the security of Franklin systems, and identify potentially affected individuals. Further, Franklin notified federal law enforcement regarding the event. Franklin is also working to implement additional safeguards and training to its employees. Franklin is providing access to credit monitoring and identity restoration services for two (2) years, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Franklin is providing potentially 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 to their credit card company and/or bank. Franklin 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. In addition, Franklin is providing written notice of this incident to relevant state regulators, as necessary, 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) 930-1345.

Very truly yours,

Alexandria N. Murphy of
MULLEN COUGHLIN LLC

ANM/jcj
Enclosure

EXHIBIT A

Franklin International

Return Mail Processing
PO Box 999
Suwanee, GA 30024

9 1 2530 *****SNGLP

SAMPLE A. SAMPLE - New Notice

APT ABC

123 ANY ST

ANYTOWN, US 12345-6789



May 27, 2022

[Extra2]

Dear Sample A. Sample:

On behalf of Franklin International ("Franklin"), I am writing to inform you of a recent data security event that may involve some of your information. Although we are unaware of any identity theft or fraud in connection with this incident, we are providing you with an overview of the incident, our response, and resources available to you to help protect your information, should you feel it is appropriate to do so.

What Happened? On or about October 19, 2021, we discovered that certain computer systems in our environment were inaccessible. We immediately took steps to mitigate the impact of the incident and launched an investigation to determine the full nature and scope of the event. Franklin also notified federal law enforcement. Through this investigation, we determined that an unknown actor gained access to certain Franklin systems between October 18, 2021 and October 19, 2021, and that certain files on those systems were viewed and/or taken by the unknown actor. We thereafter worked with specialists to conduct a comprehensive review of the impacted data to determine if there was personal information contained therein, and, if so, to whom it related. Once complete, we worked to confirm the identities and contact information for individuals and entities to provide notifications. This review was recently completed on May 9, 2022.

What Information Was Involved? Our review determined that your name and the following types of information were contained within the impacted data: [Extra1]. To date, we are unaware of any identity theft or fraud in connection with this event.

What We Are Doing. We take this incident, and the security of information in our possession, very seriously. Upon discovering the event, we immediately took steps to secure our systems and conducted an investigation to confirm the nature and scope of the activity and determine who may be affected. Additionally, while we have safeguards in place to protect data in our care, we are working to review and further enhance these protections as part of our ongoing commitment to data security. We are also offering complimentary credit monitoring and identity restoration services for twenty-four (24) months through Experian.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and monitor your credit reports for suspicious activity and to detect errors. You may also review the information contained in the attached "Steps You Can Take to Help Protect Personal Information." There you will also find more information on the credit monitoring and identity restoration services we are making available to you. While Franklin will cover the cost of these services, you will need to complete the activation process. Enrollment instructions are attached to this letter.

For More Information. If you have additional questions, please call our dedicated assistance line at (877) 355-3282, Monday – Friday, 9 am to 11 pm ET; Saturday – Sunday, 11 am to 8 pm ET (except U.S. holidays). You may also write to Franklin at 2020 Bruck Street, Columbus, OH 43207. We apologize for any inconvenience or concern this event may cause.

Sincerely,

Bee Miller
Director of Human Resources
Franklin International

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring and Identity Restoration Services

To help protect your identity, we are offering a complimentary twenty-four month membership of Experian's® IdentityWorksSM. This product provides you with superior 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: August 31, 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) 355-3282** by **August 31, 2022**. Be prepared to provide engagement number as proof of eligibility for the identity restoration services by Experian.

Additional details regarding your twenty-four 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 agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (877) 355-3282. 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 (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 this Identity Restoration support 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. You will also find self-help tips and information about identity protection at this site.

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.

* 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.

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 credit 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
1-888-298-0045	1-888-397-3742	1-833-395-6938
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 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 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 event. There is 1 Rhode Island resident impacted by this event.

Franklin International

Return Mail Processing
PO Box 999
Suwanee, GA 30024

9 1 2523 *****SNGLP

SAMPLE A. SAMPLE - Previously Notified

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



May 27, 2022

Dear Sample A. Sample:

As you may recall, on or about November 12, 2021, Franklin International ("Franklin") informed you of a data security incident that occurred in October 2021. We are reaching out now with additional information regarding the same incident because, after further review, we have confirmed that some of your personal information may have been impacted in the event. We are unaware of any identity theft or fraud in connection with this incident but wanted to provide you with an update with additional information about the event, our response, and steps you may take to protect against the possibility of identity theft and fraud, should you feel it is appropriate to do so.

What Happened? On or about October 19, 2021, we discovered that certain computer systems in our environment were inaccessible. We immediately took steps to mitigate the impact of the incident and launched an investigation to determine the full nature and scope of the event. Franklin also notified federal law enforcement. Through this investigation, we determined that an unknown actor gained access to certain Franklin systems between October 18, 2021 and October 19, 2021 and that certain files on those systems were viewed and/or taken by the unknown actor. We thereafter worked with specialists to conduct a comprehensive review of the impacted data to determine if there was personal information contained therein, and, if so, to whom it related. Once complete, we worked to confirm the identities and contact information for individuals and entities to provide notifications. This review was recently completed on May 9, 2022.

Is This A New Event? No, this is not a new event. This is an update to our previous letter you received on or about November 12, 2021, to provide you with additional information regarding the event and the types of your information that were identified as impacted by this incident.

What Information Was Involved? Our review determined that your name and the following types of information were contained within the impacted data: [Extra1]. To date, we are unaware of any identity theft or fraud in connection with this event.

What We Are Doing. We take this incident, and the security of information in our possession, very seriously. Upon discovering the event, we immediately took steps to secure our systems and conducted an investigation to confirm the nature and scope of the activity and determine who may be affected. Additionally, while we have safeguards in place to protect data in our care, we are working to review and further enhance these protections as part of our ongoing commitment to data security. We are also offering complimentary credit monitoring and identity restoration services for twenty-four (24) months through Experian.

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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	1-833-395-6938
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

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