



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

AUG 23 2021

CONSUMER PROTECTION

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75 S Clinton Avenue, Suite 510
Rochester, NY 14604

August 18, 2021

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 Guardian Community Trust, Inc. ("Guardian") located at 1 Elm Square, Suite 2D, Andover, MA 01810, and are writing to notify your office of an incident that may affect the security of some personal information relating to ninety-three (93) New Hampshire residents. By providing this notice, Guardian 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 June 21, 2021, Guardian discovered that certain of its systems were encrypted with ransomware. Upon discovery of the event, Guardian immediately disconnected the infected systems for its network, and promptly launched an investigation into the incident, including working with third-party forensic specialists, in order to determine the nature and scope of the issue. On or about June 30, 2021, we determined that some data on Guardian's systems may have been viewed or taken by unauthorized actors. Guardian then promptly undertook a thorough and time-intensive internal review of the data to determine the individuals whose information was at risk and to identify accurate address information for those impacted individuals. This process was completed on July 21, 2021.

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

Notice to New Hampshire Residents

On or about August 18, 2021, Guardian provided written notice of this incident to all affected individuals, which includes ninety-three (93) 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

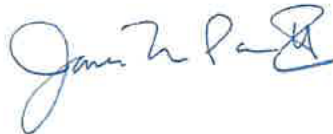
Upon discovering the event, Guardian moved quickly to investigate and respond to the incident, assess the security of Guardian's systems, and notify potentially affected individuals. Guardian is also working to implement additional safeguards and to ensure the security of its systems in the future. Guardian is providing access to credit monitoring services for five (5) years, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Guardian 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 to their credit card company and/or bank. Guardian is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4741.

Very truly yours,

A handwritten signature in blue ink, appearing to read "James Paulino", with a stylized flourish at the end.

James Paulino of
MULLEN COUGHLIN LLC

JMP:prs
Enclosure

Exhibit A



**GUARDIAN
COMMUNITY TRUST**

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

August 18, 2021

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SAMPLE A. SAMPLE - L05 OS

C/O RP OR FACILITY

APT ABC

123 ANY ST

ANYTOWN, ST 12345-6789



Dear [Sal] Name2:

Guardian Community Trust, Inc. ("Guardian") is writing to notify you as a current or former beneficiary, responsible party, remainderman or service provider of a recent incident that may impact the privacy of your personal information.

This notice provides you with information about the incident, our response, and steps you may take to better protect the information, should you feel it is appropriate to do so. We also are offering five (5) years of credit monitoring with \$1,000,000 in identity theft insurance at no cost, to any affected person who requests it.

What Happened?

On or about June 21, 2021, Guardian discovered that certain of its systems were encrypted with ransomware. Upon discovery of the event, Guardian immediately disconnected the infected systems from its network, and promptly launched an investigation into the incident, including working with third-party forensic specialists, in order to determine the nature and scope of the issue. On or about June 30, 2021, we confirmed the data on Guardian's systems that was viewed or taken by unauthorized actors. Guardian then promptly undertook a thorough and time-intensive internal review of the data to determine the individuals whose information was at risk and to identify accurate address information for those impacted individuals. This process was completed on July 21, 2021.

What Information Was Involved?

The information contained in the impacted files may include your name and Social Security number. No access was gained to financial accounts, and no assets or financial resources were taken or compromised.

What We Are Doing.

In response to this incident, Guardian worked with forensic specialists to determine the scope and impact of the unauthorized activity. Additionally, Guardian has taken steps to secure its environment, and is reviewing existing policies and procedures and implementing additional safeguards to further secure the information in our systems. As an added precaution, Guardian is offering each affected person access to five (5) years of credit monitoring and identity protection services through Experian, Inc., at no cost.

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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. Please review the attached "*Steps You Can Take To Protect Your Information*" for additional information on protecting your personal information. You will also find information on how to enroll in the credit monitoring services offered.

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 call (877) 890-9297 toll-free Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number B017403.

Sincerely,



Peter M. Macy
Executive Director

PMM/sw

STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for five (5) years.

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 five (5) years 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 five-year 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 November 30, 2021** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll [REDACTED]
- Provide your **activation code:** [REDACTED]

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 (877) 890-9297 by **November 30, 2021**. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR FIVE YEARS 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 ExtendCARETM:** 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.

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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 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 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
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.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

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.

STATE OF NH
DEPT OF JUSTICE
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