



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

JUL 05 2022

CONSUMER PROTECTION

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

July 1, 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 Habasit America, Inc. ("Habasit") located at 805 Satellite Boulevard NW, Suwanee, GA 30024, and are writing to notify your office of an incident that may affect the security of certain personal information relating to one (1) New Hampshire resident. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Habasit 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 January 24, 2022, Habasit identified suspicious activity within certain systems in its environment. In response, Habasit quickly took steps to secure its network, and, with the assistance of third-party forensic specialists, began an investigation to determine the nature and scope of the activity. On February 11, 2022, the investigation confirmed that an unauthorized individual accessed certain information in the Habasit environment between December 1, 2021, and January 24, 2022.

Given that certain information was accessed without authorization, Habasit then undertook a comprehensive review of the information to understand the specific data present and to whom it related for purposes of providing notification to potentially impacted individuals. This comprehensive review, which was again aided by third-party specialists, was completed on June 1, 2022. Thereafter Habasit worked diligently to reconcile the information with its internal records in furtherance of identifying appropriate contact information so that notification to potentially impacted individuals could commence.

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

Notice to New Hampshire Resident

On July 1, 2022, Habasit began providing written notice of this incident to potentially impacted individuals, which includes approximately one (1) New Hampshire resident. Written notice is being provided in substantially the same form as the letter attached hereto as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, Habasit moved quickly to investigate and respond to the incident, assess the security of Habasit systems, and identify potentially affected individuals. Further, Habasit promptly notified federal law enforcement regarding the incident. Moreover, in response to the event, Habasit instituted additional security measures to better protect against future similar incidents, and is reviewing and enhancing its existing policies and procedures related to data protection and security.

Additionally, as an added measure, Habasit is providing access to credit monitoring services for twelve (12) months, through Kroll, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals. Habasit is also notifying other relevant regulatory authorities, as required.

Habasit is also providing impacted individuals with guidance on how to better protect against identity theft and fraud, including 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4005.

Very truly yours,

Julie Siebert-Johnson of
MULLEN COUGHLIN LLC

JSJ/rmm
Enclosure

EXHIBIT A



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

<<b2b_text_1 (Re: Notice of Data [Event / Breach])>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

Habasit America, Inc. ("Habasit") is writing to notify you of a recent incident that may affect the privacy of some of your personal information. We write to provide you with information about the event, our response, and steps you can take to help protect against the potential misuse of your information, should you feel it is appropriate to do so.

What Happened? On or about on January 24, 2022, Habasit learned of suspicious activity within certain systems in our environment. In response, we quickly took steps to secure our network and began an investigation to determine the nature and scope of the activity. Our investigation confirmed an unauthorized individual accessed certain information in our environment between December 1, 2021, and January 24, 2022. Given that certain information was accessed without authorization, we then undertook a comprehensive review of the information to understand the specific data present and to whom it related for purposes of providing notice to potentially impacted individuals. We completed those efforts on June 1, 2022, and thereafter worked diligently to reconcile the information with our internal records in furtherance of identifying appropriate contact information so that notification to potentially impacted individuals could occur. We are notifying you because your information was present in the files accessible to the unauthorized individual, and therefore may have been accessed during this incident.

What Information Was Involved? Our investigation determined that the information related to you that may have been impacted includes your <<b2b_text_2 ("name" and data elements)>>.

What We Are Doing. We take this incident and the obligation to safeguard the information in our care very seriously. After discovering the suspicious activity, we promptly took steps to confirm our system security, and conducted a comprehensive investigation of the incident to confirm its nature, scope, and impact. Habasit also promptly notified federal law enforcement. Further, as part of our ongoing commitment to the privacy and security of personal information in our care, we instituted additional security measures to better protect against future similar incidents. We are also reviewing and enhancing our existing policies and procedures relating to data protection and security. We are also notifying relevant regulatory authorities, as required.

As an added precaution, we are offering you access to identity monitoring services and identity theft restoration services for twelve months through Kroll at no cost to you. If you wish to activate these complimentary services, you may follow the instructions included in the attached *Steps You Can Take to Help Protect Personal Information*. We encourage you to activate these services as we are unable to act on your behalf to do so.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing account statements and monitoring your free credit reports for suspicious activity and to detect errors. You should report any such activity to law enforcement. You can also activate to receive the complimentary identity monitoring services that we are offering to you. Please also review the information contained in the enclosed *Steps You Can Take to Help Protect Personal Information*.

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 our dedicated call center at (855) 516-3803, which is available from 9:00 a.m. to 6:30 p.m. Eastern Time, Monday through Friday (excluding major U.S. holidays). You may also write to Habasit at dataevent.us@habasit.com.

We sincerely regret any inconvenience or concern this incident may cause.

Sincerely,

Tim Waldner
General Manager, North America
Habasit America, Inc.

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Activate Identity Monitoring

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6 (Date)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s_n>>

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

Additional information describing your services is below.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

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. Habasit America, Inc. is located at 805 Satellite Blvd, Suwanee, GA 30024.

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.

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 is/are \[#\] Rhode Island residents impacted by this incident.](#)

