



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

JUL 01 2022

CONSUMER PROTECTION

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

June 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 Harrison French & Associates ("HFA") located at 1705 S Walton Blvd., Suite 3, Bentonville, Arkansas 72712, and write 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, HFA 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 March 31, 2022, HFA identified suspicious activity related to certain systems within its environment. HFA immediately took steps to secure its network, and launched an investigation, with the assistance of third-party forensic specialists to determine the nature and scope of the activity. Through the investigation, HFA determined that an unknown actor gained access to certain systems on March 30, 2022. As a result, the unauthorized actor may have had access to certain files within these systems and information may have been accessed or acquired by the unauthorized actor during this incident. HFA began a diligent and comprehensive review to identify information that may have been contained within the impacted files and to identify the individuals whose information may have been present. Once that review was complete, HFA conducted a time-intensive review of our records to locate contact information for purposes of notifying the potentially impacted individuals.

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The information that could have been subject to unauthorized access includes name, Social Security number, and Driver's License number.

Notice to New Hampshire Resident

On or about June 27, 2022, HFA provided written notice of this incident to one (1) New Hampshire resident. 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, HFA moved quickly to investigate and respond to the incident, assess the security of HFA systems, and identify potentially affected individuals. Further, HFA notified federal law enforcement regarding the event. HFA is also working to implement additional safeguards and training to its employees. HFA is providing access to credit monitoring 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, HFA 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. HFA 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.

HFA is providing written notice of this incident to 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 (267) 930-4888.

Very truly yours,

Richard Aponte-Boyd of
MULLEN COUGHLIN LLC

RAB/eks
Enclosure

EXHIBIT A



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

June 24, 2022

i0211-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 ADULT

APT ABC

123 ANY STREET

ANYTOWN, ST 12345-6789



[Extra1]

Dear Sample A. Sample:

Harrison French & Associates Ltd. ("HFA") writes to inform you of a recent incident that may impact the privacy of some of your information. While we are unaware of any attempted or actual misuse of your information at this time, we are providing you with this notice in an abundance of caution, to inform you of the incident, our response, and steps you may take to help protect your information, should you feel it is necessary to do so.

What Happened? On March 31, 2022, HFA identified suspicious activity related to certain systems within our environment. We immediately took steps to secure our network, and launched an investigation, with the assistance of third-party forensic specialists to determine the nature and scope of the activity. Through the investigation, we determined that an unknown actor gained access to certain systems on March 30, 2022. As a result, the unauthorized actor may have had access to certain files within these systems and information may have been accessed or acquired by the unauthorized actor during this incident. We quickly began a diligent and comprehensive review to identify information that may have been contained within the impacted files and to identify the individuals whose information may have been present. Once that review was complete, we then conducted a time-intensive review of our records to locate contact information for purposes of notifying the potentially impacted individuals. We are notifying you because the investigation recently determined information related to you was contained within the files.

What Information Was Involved? The review determined the information that may have been impacted by this incident includes your [Extra2] and name. At this time, we have no evidence that your information was subject to actual or attempted misuse as a result of this incident.



What We Are Doing. The confidentiality, privacy, and security of information within our care is among HFA's highest priorities. Upon learning of the incident, we took immediate steps to secure our environment and investigate the activity. We commenced an investigation that included working with third-party forensic specialists to understand the nature and scope of the incident. We also notified federal law enforcement about this incident and are cooperating with their investigation. As part of our ongoing commitment to the privacy of information in our care, we are reviewing our policies, procedures, and processes related to the storage and access of sensitive information, and additional workforce training is being conducted to reduce the likelihood of a similar future incident. We are also notifying applicable regulatory authorities, as required by law.

As an added precaution, we are also offering 24 months of complimentary access to credit monitoring services through Experian. Individuals who wish to receive these services must enroll by following the below enrollment instructions, as we are unable to activate them on your behalf.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud and to review your account statements and credit reports for suspicious activity and to detect errors. You can review the enclosed *Steps You Can Take to Help Protect Your Information* to learn helpful tips on steps you can take to protect against possible information misuse, should you feel it appropriate to do so. You may also enroll in the complimentary credit monitoring services we are offering to you.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, or need assistance, please call our dedicated assistance line at (888) 994-0268, 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: **B055022**. You may also write to HFA at 1705 S Walton Blvd. Suite 3, Bentonville, AR 72712.

Sincerely,

Dave Wilgus
CEO
Harrison French & Associates Ltd.

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit Monitoring

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 September 30, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: 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 **(888) 994-0268** by **September 30, 2022**. 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 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 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 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
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 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 are 12 Rhode Island residents impacted by this incident.

