



August 11, 2023

VIA E-MAIL

Office of the New Hampshire Attorney General
Consumer Protection & Antitrust Bureau
33 Capitol Street
Concord, NH 03301
E-mail: DOJ-CPB@doj.nh.gov

Re: Notice of Data Event

To Whom It May Concern:

We represent Interface, Inc. (“Interface”) located at 1280 West Peachtree St NW, Atlanta, GA 30309, and are writing to notify your office of an incident that may affect the security of certain personal information relating to sixty-four (64) New Hampshire residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Interface 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 November 18, 2022, Interface experienced a data security incident that impacted our computer systems and caused a temporary disruption to operations. Upon learning of the incident, Interface quickly worked to secure its systems and, with the assistance of external forensic specialists, commenced an investigation to confirm the nature and scope of the incident. The investigation determined that an unauthorized actor may have accessed and/or acquired a limited amount of information stored on Interface’s systems between October 15, 2022, and November 20, 2022. Interface subsequently conducted a thorough and time-consuming review of the affected data to determine whether any sensitive information was accessed or acquired as a result of the incident. This complex and thorough review recently concluded on July 5, 2023.

The information that could have been subject to unauthorized access includes

Notice to New Hampshire Residents

On or about August 11, 2023, Interface began providing written notice of this incident to sixty-four (64) 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 incident, Interface moved quickly to investigate and respond to the incident, assess the security of Interface systems, and identify potentially affected individuals. As part of Interface's initial response, Interface notified federal law enforcement regarding the incident. Interface is providing access to credit monitoring services for _____, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Interface 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. Interface is providing individuals with information on how to place fraud alerts and security freezes on their 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.

Interface is providing written notice of this incident to relevant state regulators, as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security incident, please contact us at _____.

Very truly yours,

Carolyn Purwin Ryan of
MULLEN COUGHLIN LLC

CPR/dle
Enclosure

EXHIBIT A

Interface®

Return Mail Processing
PO Box 999
Suwanee, GA 30024

August 14, 2023

[Extra2]

To the Parent or Guardian of Sample A. Sample:

Interface, Inc. ("Interface") is writing to inform you of a recent incident that may impact the privacy of some of your minor's information. Although we are unaware of any actual or attempted misuse of your minor's information, we are providing you with this notice, which provides details about the incident, our response to it, and the resources available to assist you in safeguarding your minor's information, should you feel it is appropriate to do so.

What Happened? On November 18, 2022, we experienced a data security incident that impacted our computer systems and caused a temporary disruption to operations. Upon learning of the incident, we immediately worked to secure our systems and with the assistance of third-party forensic specialists, commenced an investigation to confirm the nature and scope of the incident. The investigation determined that we were the victim of a sophisticated cyberattack, and that an unauthorized actor may have accessed and/or acquired a limited amount of information stored on our systems between October 15, 2022, and November 20, 2022. We conducted a thorough and time-consuming review of the affected data to determine whether any sensitive information was accessed or acquired as a result of the incident. This review was completed on August 2, 2023, and it determined that your minor's information was in the files that may have been accessed or acquired without authorization.

What Information Was Involved? As indicated above, we are unaware of any actual or attempted misuse of your minor's information. However, we are providing you with this notification out of an abundance of caution. The information present in the files that were potentially impacted by this incident may have included your minor's

What We Are Doing. Safeguarding the information entrusted to us is one of our top priorities. We responded immediately to this incident, promptly notified law enforcement authorities, and have been working diligently to provide you with an accurate notice of the incident as soon as possible. We instituted additional safeguards to further secure the information stored on our network following this incident. We are also reviewing and enhancing our existing policies and procedures as it relates to data security.

As an added precaution, we are providing your minor with _____ of complimentary access to identity protection services through Experian. Although we are covering the cost of these services, due to privacy restrictions, you will need to complete the activation process on your minor's behalf using the enrollment instructions included in the enclosed *Steps You Can Take to Protect Personal Information*.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud and review your minor's account statements for suspicious activity and to detect errors over the next _____. Any suspicious activity should be reported to the appropriate insurance company, health care provider, or financial institution. You can also find out more about how to safeguard your minor's information in the enclosed *Steps You Can Take to Protect Personal Information*. There, you will find additional information about the complimentary identity protection services offered to your minor and how to enroll.

For More Information. We understand that you may have questions about this incident that are not addressed in this notice. If you have additional questions, please contact our dedicated assistance line at _____, Monday through Friday, between 6 a.m. to 8 p.m. PST and Saturday and Sunday, between 8 a.m. to 5 p.m. PST (excluding major US holidays). You may also write to us at: 1280 West Peachtree St NW, Atlanta, GA 30309.

We apologize for any inconvenience this incident may cause. We are committed to protecting the information in our possession.

Sincerely,

Interface, Inc.

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Complimentary Identity Protection Services

To help protect your minor dependent's identity, we are offering complimentary access to Experian IdentityWorksSM for

If you believe there was fraudulent use of your minor dependent's 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 minor's 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 your minor for _____ from _____ and does not require any action on your part at this time. The Terms and Conditions for this offer are located at _____

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 _____ membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your minor dependent's personal information, please follow the steps below:

- Ensure that you **enroll by** _____ (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll:
- Provide your **activation code**:
- Provide your minor's information when prompted

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 _____ by _____. Be prepared to provide engagement number _____ as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR MEMBERSHIP

EXPERIAN IDENTITYWORKS

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:

- **Social Security Number Trace:** Monitoring to determine whether enrolled minors in your household have an Experian credit report. Alerts of all names, aliases and addresses that become associated with your minor's Social Security Number (SSN) on the Experian credit report.
- **Internet Surveillance:** Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your minor's personal information on the Dark Web.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you and your minor address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** Your minor receives 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.

**** 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.**

Monitor Your Minor's Accounts

Typically, a minor under the age of 18 does not have credit in his or her name, and the consumer reporting agencies do not have a credit report in a minor's name. To find out if your minor has a credit report or to request a manual search for your minor's Social Security number each credit bureau has its own process. To learn more about these processes or request these services, you may contact the credit bureaus by phone or in writing or you may visit the below websites:

Experian

Experian Child Identity
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/form-minor-child.html

TransUnion

TransUnion Child Identity
P.O. Box 2000
Chester, PA 19016
1-800-916-8800
www.transunion.com/credit-disputes/child-identity-theft-inquiry-form

Equifax

Equifax Child Identity
P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
<https://www.equifax.com/personal/education/identity-theft/child-identity-theft/>

Under U.S. law, individuals with credit are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of a credit report should your minor have established credit.

Adults and minors 16 years or older have the right to place a "credit freeze" on a credit report, which will prohibit a consumer reporting agency from releasing information in the credit report without express authorization. A parent or guardian also has the right to place a "credit freeze" on a minor's credit report if the child is under the age of 16. This right includes proactively placing a "credit freeze" on a minor's credit report if the minor is under 16 years old. If the nationwide credit reporting agencies do not have a credit file on the minor, they will create one so they can freeze it. This record cannot be used for credit purposes. It is there to make sure the child's record is frozen and protected against potential identity theft and fraud. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on a credit report. Should you wish to place a credit freeze on a credit file or proactively place a freeze on a minor's credit report, please contact the major consumer reporting agencies listed below:

Experian

P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion

P.O. Box 160
Woodlyn, PA 19094
1-888-909-8872
www.transunion.com/credit-freeze

Equifax

P.O. Box 105788
Atlanta, GA 30348-5788
1-800-349-9960
www.equifax.com/personal/credit-report-services

As an alternative to a credit freeze, individuals with established credit 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 the minor is a victim of identity theft, he/she is 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 agencies listed below:

Experian

P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/center.html

TransUnion

P.O. Box 2000
Chester, PA 19016
1-800-680-7289
www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax

P.O. Box 105069
Atlanta, GA 30348
1-800-525-6285
www.equifax.com/personal/credit-report-services

To request information about the existence of a credit file in your minor's name, search for your minor's Social Security number, place a credit freeze on your minor's credit file, place a fraud alert on your minor's credit report (if one exists), or request a copy of your minor's credit report you may be required to provide the following information:

- A driver's license or another government issued identification card, such as a state ID card, etc.;

- Proof of your address, such as a copy of a bank statement, utility bill, insurance statement, etc.;
- A copy of your minor's birth certificate;
- A copy of your minor's Social Security card;
- Your minor's full name, including middle initial and generation, such as JR, SR, II, III, etc.;
- Your minor's date of birth; and
- Your minor's previous addresses for the past two years.

You can further educate yourself regarding identity theft prevention, fraud alerts, credit freezes, and the steps you can take to protect your minor by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can 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 or your minor 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 or your minor 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: 441 4th St. NW #1100 Washington, D.C. 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.

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 21 Rhode Island residents impacted by this incident.

