RECEIVED

MAY 20 2021



**CONSUMER** PROTECTION

Edward J. Finn Office: (267) 930-4776 Fax: (267) 930-4771 Email: efinn@mullen.law

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

May 13, 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 InVue Security Products Inc. ("InVue") located at 9201 Baybrook Lane, Charlotte, North Carolina 28277, and are writing to notify your office of an incident that may affect the security of some personal information relating to three (3) New Hampshire residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, InVue 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 13, 2021, InVue discovered suspicious activity on its servers. Upon further review, it identified encrypted files on the servers. InVue promptly launched an investigation, working with outside counsel and third-party forensics specialists, to determine the nature and scope of this event. On March 22, 2021, InVue confirmed the data on InVue's systems that was viewed or taken by the unauthorized actors. InVue then promptly undertook a thorough and time-intensive internal review to determine the impacted individuals and entities and their address information. This review was completed on April 8, 2021.

The information that could have been subject to unauthorized access includes name, Social Security number, driver's license number, financial account information, and health insurance information.

Mullen.law

Office of the New Hampshire Attorney General May 13, 2021 Page 2

#### Notice to New Hampshire Residents

On or about May 12, 2021, InVue provided written notice of this incident to all affected individuals, which includes three (3) 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, InVue moved quickly to investigate and respond to the incident, assess the security of InVue systems, and notify potentially affected individuals and entities. InVue is also working to implement additional safeguards and training to its employees. InVue has already provided access to credit monitoring services for twelve (12) months, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, InVue 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. InVue 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. InVue is also providing written notice of this incident to the Department of Health and Human Services and 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) 930-4776.

Very truly yours,

Edward J. Finn of MULLEN COUGHLIN LLC

EJF:prs Enclosure

# Exhibit A





May 12, 2021



G4524-L01-0000001 T00001 P001 \*\*\*\*\*AUTO\*\*MIXED AADC 159 SAMPLE A. SAMPLE - L01 ALLSTATES APT ABC 123 ANY ST ANYTOWN, ST 12345-6789

## NOTICE OF SECURITY INCIDENT/DATA BREACH

Dear Sample A. Sample:

InVue Security Products Inc. ("InVue") is writing to inform you of a recent event that may impact the privacy of some of your personal information. We are providing you information about the event, our response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

#### What Happened?

On March 13, 2021, InVue discovered suspicious activity on its servers. Upon further review, it identified encrypted files on the servers. InVue promptly launched an investigation, working with outside counsel and third-party forensics specialists, to determine the nature and scope of this event. On March 22, 2021, we confirmed the data on InVue's systems that was viewed or taken by unauthorized actors. InVue 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.

#### What Information Was Involved?

The information contained in the impacted files included your: name, [EXTRA1].



#### What We Are Doing.

In response to this incident, InVue worked with specialists to determine the scope and impact of the unauthorized activity. Additionally, InVue 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, InVue is offering you access to [EXTRA3] months of credit monitoring and identify protection services through Experian at no cost to you.

#### 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. Please review the attached "Steps You May 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 you may have questions that are not answered in this letter. If you have questions, please contact (855) 726-7360 (toll free), Monday through Friday, 9:00 a.m. to 11:00 p.m., ET and Saturday/Sunday, 11:00 a.m. to 8:00 p.m., ET.

Sincerely,

In whit

Andy Moock Executive Vice President www.invue.com

## STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

#### Enroll in Credit Monitoring

# What we are doing to protect your information:

To help protect your identity, we are offering a complimentary [EXTRA3] membership of Experian's<sup>®</sup> IdentityWorks<sup>SM</sup>. 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, 2021 (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: https://www.experianidworks.com/credit
- Provide your activation code: ABCDEFGHI

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 (855) 726-7360 by **August 31, 2021**. Be prepared to provide engagement number ENGAGE# as proof of eligibility for the identity restoration services by Experian.

# ADDITIONAL DETAILS REGARDING YOUR [EXTRA3]-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 ExtendCARE<sup>TM</sup>: 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 (855) 726-7360. 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 **[EXTRA3]** 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 <u>www.ExperianIDWorks.com/restoration</u>. You will also find self-help tips and information about identity protection at this site.

\* 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.



#### **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 <u>www.annualcreditreport.com</u> 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, military identification, 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 fraud alert or credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/cred	https://www.experian.com/hel	https://www.transunion.com/credi
it-report-services/	p′	t-help
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069	Experian Fraud Alert, P.O.	TransUnion Fraud Alert, P.O. Box
Atlanta, GA 30348-5069	Box 9554, Allen, TX 75013	2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788	Experian Credit Freeze, P.O.	TransUnion Credit Freeze, P.O.
Atlanta, GA 30348-5788	Box 9554, Allen, TX 75013	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; <u>www.identitytheft.gov</u>; 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 St NW, Washington, DC 20001, United States; 202-727-3400; and <u>oag@dc.gov</u>.

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 <u>www.oag.state.md.us</u>. InVue is located at 9201 Baybrook Lane, Charlotte, North Carolina 28277.

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 <u>www.ncdoj.gov</u>.

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/.

DEPT OF JUSTICE DEPT OF JUSTICE SO21 MAY 20 PM 1: 35

