



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

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

April 11, 2024

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 Mississippi Children's Home Society, CARES Center, Inc., Mississippi Children's Home Services, Inc., d.b.a. Canopy Children's Solutions ("Canopy") located at 1465 Lakeland Drive, Jackson, MS 39216, and are writing to notify your office of an incident that may affect the security of certain personal information relating to six (6) New Hampshire residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Canopy 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 April 4, 2023, Canopy discovered encrypted files on certain systems in its network. In response, Canopy immediately took steps to secure its systems and launched an investigation into the full nature and scope of the event with the assistance of third-party forensic specialists. The investigation determined that an unauthorized actor gained access to certain systems on its network and may have accessed and/or acquired certain files and folders from these systems on April 4, 2023. Canopy identified the potentially affected files and undertook a comprehensive and time-consuming review of the files to identify the type of information contained therein, and to whom the information relates. On October 13, 2023, Canopy completed this extensive review process and identified that information pertaining to certain current and former members was present in the potentially affected files. Since then, Canopy has been performing additional work to review and verify the affected information as well as locate address information to provide direct notice

to as many impacted individuals as possible. This effort was time intensive given that Canopy has different relationships with the potentially impacted individuals, such as an employer, health care provider or educator, that necessitated looking for addresses in several different databases. On March 8, 2024, Canopy completed its work to locate the available addresses. It was not until this date that Canopy was aware that any New Hampshire residents were impacted. Canopy does not have evidence of any actual or attempted fraudulent misuse of information as a result of this incident.

The information that could have been subject to unauthorized access varies for each individual and includes the following:

Notice to New Hampshire Residents

On April 11, 2024, Canopy provided written notice of this incident to six (6) 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, Canopy moved quickly to investigate and respond to the incident, assess the security of Canopy systems, and identify potentially affected individuals. Further, Canopy notified federal law enforcement regarding the event. Canopy also implemented additional safeguards and training to its employees. Canopy is providing access to credit monitoring services for _____ through Experian to individuals whose Social Security number was potentially affected by this incident, at no cost to these individuals.

Additionally, Canopy 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. Canopy 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.

Canopy is providing written notice of this incident to relevant state and federal regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Office of the New Hampshire Attorney General

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Contact Information

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

Very truly yours,

Paul T. McGurkin, Jr. of
MULLEN COUGHLIN LLC

PTM/jc2
Enclosure

EXHIBIT A

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

April 11, 2024



L1646-L02-0000002 T00001 P001 *****SCH 5-DIGIT 12345
SAMPLE A SAMPLE - L02 ADULT WITH CM
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



NOTICE OF [VARIABLE TEXT 1 (HEADING)]

Dear Sample A. Sample,

Mississippi Children’s Home Society, CARES Center, Inc., Mississippi Children’s Home Services, Inc., d.b.a. Canopy Children’s Solutions (“Canopy”) is writing to notify you of an incident that may impact the privacy of some of your personal information. Canopy takes this incident very seriously and is providing you with information about the incident, our response to it, and resources we are making available to you to help protect your information, should you feel it appropriate to do so.

What Happened? On April 4, 2023, Canopy discovered encrypted files on certain systems in our network. In response, we immediately took steps to secure our systems and launched an investigation into the full nature and scope of the event with the assistance of third-party forensic specialists. The investigation determined that an unauthorized actor gained access to certain systems on our network and may have accessed and/or acquired certain files and folders from these systems on April 4, 2023. We identified the potentially affected files and undertook a comprehensive and time-consuming review of the files to identify the type of information contained therein, and to whom the information relates. On October 13, 2023, we completed this extensive review process and identified that information pertaining to certain current and former members was present in the potentially affected files, including you. Since then, we have been performing additional work to review and verify the affected information as well as locate address information to provide direct notice to as many impacted individuals as possible.

What Information Was Involved? While we have no evidence of any actual or attempted fraudulent misuse of information as a result of this incident, our review determined that the following types of information were present in the potentially affected files that may have been accessed and/or acquired by the unauthorized actor: your [VARIABLE TEXT 2 (DATA ELEMENTS)].

What Are We Doing? The confidentiality, privacy, and security of personal information within our care is among our highest priorities, and we have strict security measures in place to protect information in our care. Upon becoming aware of this incident, we immediately took steps to secure our systems and performed a full investigation. We have implemented additional security measures to further protect against similar incidents moving forward. We notified federal law enforcement of this incident and are cooperating with their investigation. We are also notifying applicable regulators, including the U.S. Department of Health and Human Services.

Additionally, we are offering credit monitoring and identity theft protection services for 12 months through Experian, at no cost to you. **The deadline to enroll in these services is** . Please note that you will not be automatically enrolled in these services. Should you wish to do so, you will need to enroll yourself in these services, as we are not able to do so on your behalf. You may find instructions on how to enroll in these services in the enclosed *Steps You Can Take to Help Protect Personal Information*.

ENGAGE#

What Can You 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. You may also review the information contained in the enclosed *Steps You Can Take to Help Protect Personal Information*. There you will also find more information on the complimentary credit monitoring and identity protection services we are making available to you, free of cost.

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 833-918-1094 between the hours of 8:00 am - 8:00 pm, Central Time, Monday through Friday (excluding major U.S. holidays). You may also write to Canopy at 1465 Lakeland Drive, Jackson, MS 39216.

We sincerely regret any inconvenience or concern this incident may cause you. Protecting your information is very important to us, and we remain committed to safeguarding the information in our care.

Sincerely,

Dr. Terry Hight
Chief Operating Officer

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring and Restoration

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for ## 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 ## 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 ##-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:

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

ADDITIONAL DETAILS REGARDING YOUR ##-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.

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 may need to provide the following information, depending on whether the request is made online, by phone, or by mail:

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 fraud alert or 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
1-888-298-0045	1-888-397-3742	1-800-916-8800
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 <https://www.marylandattorneygeneral.gov/>.

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, individuals have the right to obtain any police report filed in regard to this event. There are approximately 3 Rhode Island residents that may be impacted by this event.