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CONSUMER PROTECTION

Samuel Sica, III Office: (267) 930-4802 Fax: (267) 930-4771 Email: ssica@mullen.law

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

April 27, 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 Piedmont Plastics, Inc. ("Piedmont"), located at 5010 W.T. Harris Blvd., Charlotte, NC 28269, and are writing to notify your office of an event that may affect the security of some personal information relating to approximately thirty-five (35) New Hampshire residents. This notice may be supplemented with new significant facts learned subsequent to its submission. By providing this notice, Piedmont 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 3, 2020, Piedmont learned that it was the target of a cyberattack and that portions of its computer network were infected with malware. Piedmont immediately took systems offline and launched an investigation, with the assistance of third-party computer forensic specialists, into the nature and scope of the incident. Piedmont's investigation determined that the cybercriminals gained access to its network between November 1, 2020 and November 3, 2020. The investigation also determined that certain files and folders stored within Piedmont's environment that contain personal information were accessed and acquired by the unknown actor.

Piedmont then worked with third-party specialists to perform a comprehensive review of the contents of the affected systems to determine what personal information was contained in the systems and to whom the information related. Upon completion of the third-party review, Piedmont conducted a manual review of internal records to determine the identities and contact information for potentially impacted individuals. On or about April 9, 2021, the ongoing review process confirmed certain state residents were impacted.

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The information impacted by this event varies by individual and for New Hampshire residents can include: Social Security number, driver's license or other government-issued identification number, passport number, username and password, financial account information, and email address and password.

#### Notice to New Hampshire Residents

On January 6, 2021, Piedmont began providing preliminary notice of this event to potentially affected individuals, along with an offer of credit monitoring services, while the investigation was ongoing. On April 27, 2021, Piedmont continued providing written notice of this incident to potentially affected individuals, which includes approximately thirty-five (35) 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, Piedmont moved quickly to investigate and respond to the incident, assess the security of Piedmont systems, and notify potentially affected individuals. Piedmont is also working to implement additional safeguards and training to its employees. Piedmont is providing access to credit monitoring and identity restoration services for one (1) year, through Equifax, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals. Piedmont is also providing the contact information for a dedicated call center for potentially affected individuals to contact with questions or concerns regarding this event.

Additionally, Piedmont 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. Piedmont 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.

#### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4802.

Very truly yours,

Samuel Sica, III of MULLEN COUGHLIN LLC

SZS/msf

# EXHIBIT A

#### Piedmont Plastics

where solutions take shape Return Mail Processing Center P.O. Box 6336 Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
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Re: Notice of Data Breach

#### Dear <</Name 1>>:

At Piedmont Plastics, Inc. ("Piedmont") we understand that the confidentiality of your information is very important, and we are committed to protecting it. We are writing to make you aware of an incident that may affect the security of some of your information. This letter provides details of the incident, our response, and resources available to you to help protect your information from possible misuse, should you feel it is appropriate to do so.

What Happened. On November 3, 2020, Piedmont learned that it was the target of a cyberattack and that portions of our computer network were infected with malware. We immediately took systems offline and launched an investigation into the nature and scope of the incident. We learned that the cybercriminals gained access to our network between November 1, 2020 and November 3, 2020. Our investigation determined that certain files and folders stored within Piedmont's environment were accessed and acquired by the unknown actor.

We then worked with third-party specialists to perform a comprehensive review of the contents of the affected systems to determine what information was contained in the systems and to whom the information related. Upon completion of the third-party review, we then conducted a manual review of our records to determine the identities and contact information for potentially impacted individuals. That process was recently completed.

What Information Was Involved. We determined that the following information related to you was accessed and acquired by the unknown actor during this incident: name, << Data Elements>>.

What We Are Doing. The confidentiality, privacy, and security of information in our care is among Piedmont's highest priorities. Upon discovering this incident, we immediately took steps to review and reinforce the security of our systems. We are reviewing existing security policies and have implemented additional cybersecurity measures to further protect against similar incidents moving forward. We reported this incident to federal law enforcement and continue to cooperate with their investigation.

As an added precaution, we are offering you access to credit monitoring and identity theft restoration services for 12 months at no cost to you. Enrollment instructions are attached to this letter.

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 and to detect errors. Please also review the information contained in the enclosed "Steps You Can Take to Help Protect Your Information." We encourage you to enroll in the credit monitoring services being offered to you as we are not able to do so on your behalf.

<<Date>>

For More Information. If you have additional questions, please call our dedicated assistance line at 855-654-0927 between the hours of 9:00 a.m. and 9:00 p.m. Eastern Time, Monday through Friday, (excluding U.S. holidays). You may also write to Piedmont, attn: Greg Young, at 5010 West W.T. Harris Blvd., Charlotte, NC 28269.

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We take this incident very seriously and sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

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Greg Young Chief Financial Officer Piedmont Plastics, Inc.

#### STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

#### Enroll in Credit Monitoring

#### FOR ADULT INDIVIDUALS OVER THE AGE OF EIGHTEEN (18)

#### Go to www.equifax.com/activate

Enter your unique Activation Code of << ADULT ACTIVATION CODE>> then click "Submit" and follow these 4 steps:

#### 1. Register:

Complete the form with your contact information and click "Continue."

If you already have a myEquifax account, click the 'Sign in here' link under the "Let's get started" header. Once you have successfully signed in, you will skip to the Checkout Page in Step 4.

#### 2. Create Account:

Enter your email address, create a password, and accept the terms of use.

3. Verify Identity:

- To enroll in your product, we will ask you to complete our identity verification process.
- 4. Checkout:

Upon successful verification of your identity, you will see the Checkout Page.

Click 'Sign Me Up' to finish enrolling.

You're done!

The confirmation page shows your completed enrollment.

Click "View My Product" to access the product features.

#### Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications<sup>†</sup> when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts<sup>2</sup>, which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock<sup>3</sup>
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft<sup>4</sup>

### To sign up for US Mail delivery, dial 1-855-833-9162 for access to the Equifax Credit Watch automated enrollment process. Note that all credit reports and alerts will be sent to you via US Mail only.

1. Activation Code: You will be asked to enter your enrollment code as provided at the top of this letter.

2. Customer Information: You will be asked to enter your home telephone number, home address, name, date of birth and Social Security Number.

**3.** Permissible Purpose: You will be asked to provide Equifax with your permission to access your Equifax credit file and to monitor your file. Without your agreement, Equifax cannot process your enrollment.

4. Order Confirmation: Equifax will provide a confirmation number with an explanation that you will receive your Fulfillment Kit via the US Mail (when Equifax is able to verify your identity) or a Customer Care letter with further instructions (if your identity cannot be verified using the information provided). Please allow up to 10 business days to receive this information.

<sup>1</sup>WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded. <sup>3</sup>The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC. <sup>3</sup>Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit wew.optoutprescreen.com. <sup>4</sup>The Identity Thef Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to

#### FOR MINOR INDIVIDUALS UNDER THE AGE OF EIGHTEEN (18)

Enter your Activation Code: <</MINOR ACTIVATION CODE>>

#### **Enrollment Deadline:** << *Enrollment Deadline*>>

#### Equifax Child Monitoring Package (for Equifax Credit Watch<sup>TM</sup> Gold members)

#### **Key Features:**

- Child Monitoring for up to four children under the age of 18
- Emailed notifications of activity on the child's Equifax credit report

#### **Enrollment Instructions:**

Parent/guardian, after completing your enrollment in Equifax Credit Watch™ Gold:

#### Return to www.equifax.com/activate.

Enter your unique Activation Code of <</MINOR ACTIVATION CODE>> for Equifax Child Monitoring Package.

Click "Submit" and follow these additional steps.

1. Sign In:

Click the 'Sign in here' link under the "Let's get started" header.

Sign in with your email address and password you created when initially creating your account.

- 2. Checkout:
  - Click 'Sign Me Up' to finish your enrollment.
  - You're done!

The confirmation page shows your completed enrollment.

Click "View My Product" to access the product features and enroll minor children.

#### How to Add Minors to Your Equifax Child Monitoring Package:

- You will be able to add minors to your Equifax Child Monitoring Package through your product dashboard.
- 1. Sign in to your account to access the "Your People" module on your dashboard.
- 2. Click the link to "Add a Child."
- 3. From there, enter your child's first name, last name, date of birth and social security number. Repeat steps for each minor child (up to four).

Equifax will then create an Equifax credit file for your child, lock it and then alert you if there is any activity on that child's Equifax credit file. You can add up to 4 children under the age of 18 with your Equifax Child Monitoring Package.

#### Monitor 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;
- 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/credit- report-services/	https://www.experian.com/help/	https://www.transunion.com/credit- help
1-888-298-0045	1-888-397-3742	1-833-395-6938
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; <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 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>. Piedmont Plastics, Inc. is located at 5010 West W.T. Harris Blvd., Charlotte, NC 28269.

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.rucdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; <u>www.riag.ri.gov</u>; 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 13 Rhode Island residents impacted by this incident.

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 violators. 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

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