



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

MAY 15 2023

CONSUMER PROTECTION

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

May 8, 2023

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

To Whom It May Concern:

We represent PRGX Global, Inc. ("PRGX") located at 200 Galleria Parkway, Suite 450, Atlanta, GA 30339, and are writing to notify your office of an incident that may affect the security of certain personal information relating to twenty-six (26) New Hampshire residents. By providing this notice, PRGX 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 9, 2022, PRGX became aware that certain computer servers and systems in its environment were inaccessible. PRGX immediately took steps to secure its systems and launched an investigation with the assistance of cyber incident response specialists to determine the full nature and scope of the event. PRGX also promptly reported the event to federal law enforcement.

Through its investigation, PRGX determined that an unknown actor gained access to its systems between April 8, 2022 and April 9, 2022, and certain files on those systems may have been viewed or downloaded. Therefore, in an abundance of caution, PRGX undertook a comprehensive and time-intensive review of the potentially affected files, with the assistance of forensic data review specialists, to identify whether personal information was contained therein and to whom that information related. PRGX then worked to validate the results of the review and determine address information for impacted individuals. This review was completed on or around March 31, 2023.

The information that could have been subject to unauthorized access includes

Notice to New Hampshire Residents

On or about May 8, 2023, PRGX provided written notice of this incident to twenty-six (26) 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, PRGX moved quickly to investigate and respond to the incident, assess the security of PRGX systems, and identify potentially affected individuals. Further, PRGX promptly notified federal law enforcement regarding the event. PRGX has also implemented several additional safeguards and enhanced training to its employees. PRGX is providing access to credit monitoring services for one (1) year, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, PRGX is providing impacted individuals with guidance on how to better protect against identity theft and fraud. PRGX 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.

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

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,

Edward J. Finn of
MULLEN COUGHLIN LLC

EJF/jlt
Enclosure

EXHIBIT A



PO Box 480149
Niles, IL 60714

To Enroll, Please Call:

1-888-567-0207

Or Visit:

<https://app.idx.us/account-creation/protect>

Enrollment Code: [XXXXXXXXXX]

<<First Name>> <<Last Name>>

<<Address 1>> <<Address 2>>

<<City>>, <<State>> <Zip>>

May 5, 2023

<<Variable Header>>

Dear <<First Name>> <<Last Name>>:

PRGX Global, Inc. ("PRGX") is writing to inform you of a recent data security incident that may involve some of your information. We are providing you with 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 appropriate to do so.

What Happened? On April 9, 2022, we became aware that certain computer servers and systems in our environment were inaccessible. We immediately took steps to secure our systems and launched an investigation with the assistance of cyber incident response specialists to determine the full nature and scope of the event. We also promptly reported the event to federal law enforcement. Through our investigation, we determined that an unknown actor accessed our systems between April 8, 2022 and April 9, 2022, and took or viewed certain files. Therefore, in an abundance of caution, we conducted a thorough review of the affected files, with the assistance of forensic data review specialists, to identify whether personal information was contained therein and to whom that information related. We then worked to confirm the address information for those individuals and entities. This review was recently concluded on March 31, 2023.

What Information Was Involved? While we currently have no evidence that any information has been used to commit identity theft or fraud, the investigation determined the following types of your information were present in the impacted environment:

What We Are Doing. Upon learning of the event, we immediately took steps to secure our systems and conducted an investigation to confirm the nature and scope of the activity and determine who may be affected. Additionally, while we have safeguards in place to protect data in our care, we have taken steps to further enhance these protections and continue to monitor these safeguards as part of our ongoing commitment to data security. We also reported this event to federal law enforcement and government regulators.

Although we have no evidence that any information has been used to commit identity theft or fraud, as an added precaution, we are also offering you <<12/24>> months of credit monitoring and identity restoration services at no cost to you through IDX, A ZeroFox Company. Enrollment instructions are enclosed with 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 credit reports for suspicious activity and to detect errors. Please review the enclosed *Steps You Can Take to Help Protect Your Personal Information* for useful information on what you can do to better protect against possible misuse of your information. You may also enroll in the free credit monitoring services we have provided for you.

For More Information. If you have additional questions, you may our call center at (toll free), Monday through Friday, 9 am to 9 pm Eastern Time, excluding U.S. holidays. You may also write to PRGX at 200 Galleria Parkway, Suite 450, Atlanta, GA 30339, Attn: Chief Compliance Officer.

Sincerely,

Alicia Jackson
Chief Compliance Officer
PRGX Global, Inc.

Steps You Can Take to Help Protect Your Personal Information

Enroll in Credit Monitoring Services

- 1. Website and Enrollment.** Go to _____ and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Please note the deadline to enroll is _____.
- 2. Activate the credit monitoring** provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.
- 3. Telephone.** Contact IDX at _____ to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

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 a free credit report, visit _____ or call, toll-free, _____. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any 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 a consumer's name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of 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 they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, 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

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state attorney general. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and 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, 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 <https://www.marylandattorneygeneral.gov/>.

For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their 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 consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their 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 <<Number of RI Residents Post NCOA>> Rhode Island residents that may be impacted by this event.