



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED
APR 03 2023
CONSUMER PROTECTION

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

March 29, 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 Smead Manufacturing ("Smead") located at 600 Smead Boulevard, Hastings, MN 55033, and write to notify your office of an incident that may affect the security of certain personal information relating to one (1) New Hampshire resident. By providing this notice, Smead 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

In early February 2023, Smead became aware of unusual activity in a Smead email account. Smead promptly took steps to secure the account and began an investigation into the nature and scope of the activity. Through this investigation, it was determined that a Smead email account was accessed without authorization between February 1, 2023 and February 7, 2023. Smead therefore began taking steps to review the relevant emails to determine what information was present and to whom it related. On February 24, 2023, Smead learned that certain former and current employee information was present in one of the relevant emails. It completed its review of the relevant emails on or around February 28, 2023 and began taking steps to provide notice to relevant individuals identified the review. Through address validation efforts, on March 27, 2023, it was confirmed that this data included information related to one (1) New Hampshire resident. The information that could have been subject to unauthorized access includes

Notice to New Hampshire Resident

On or about March 29, 2023, Smead began providing written notice of this incident to potentially affected individuals, including the one (1) New Hampshire resident. 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

In response to this incident, Smead promptly commenced a diligent investigation. As part of its ongoing commitment to the security of its systems, Smead is also reviewing and enhancing its existing policies, processes and security measures. Smead is also taking steps to notify potentially affected individuals and providing access to two (2) years of credit monitoring services through Experian to these individuals. Additionally, Smead is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including 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. Smead 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,

M. Alexandra Belton of
MULLEN COUGHLIN LLC

MABB/asm
Enclosure

EXHIBIT A



est. 1906

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

March 29, 2023



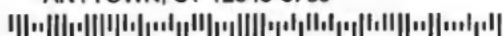
J2199-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345

SAMPLE A SAMPLE - L01 INDIVIDUAL

APT ABC

123 ANY STREET

ANYTOWN, ST 12345-6789



[RE: Notice of Data Breach]

Dear Sample A. Sample:

Smead Manufacturing ("Smead") writes to make you aware of a recent incident that may affect the privacy of some of your information. This letter provides information on the incident, our response, and resources available to you to help protect your personal information, should you feel it appropriate to do so.

What Happened? In early February 2023, we became aware of unusual activity in a Smead email account. We promptly took steps to secure the account and began an investigation into the nature and scope of the activity. Through this investigation, we determined that a Smead email account was accessed without authorization between February 1, 2023 and February 7, 2023. We therefore began taking steps to review the relevant emails to determine what information was present and to whom it related. On February 24, 2023, we learned that certain former and current employee information was present in one of the relevant emails. You are receiving this letter because some of your information was found through our review.

What Information Was Involved? The information potentially affected includes your

What We Are Doing. In response to this incident, we promptly commenced a diligent investigation. As part of our ongoing commitment to the security of our systems, we are also reviewing and enhancing our existing policies, processes and security measures. We are also taking steps to notify potentially affected individuals.

Credit Monitoring. As an added precaution, we are also offering you two (2) years of access to credit monitoring services through Experian at no cost to you. Please note, you must enroll by following the attached enrollment instructions as we are not able to enroll you on your behalf.

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 attached *Steps You Can Take to Help Protect Personal Information*. There you will also find more information on the complimentary credit monitoring services we are making available to you.

For More Information. If you have additional questions, please call our dedicated assistance line at 833-514-1448, toll-free Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays). Be prepared to provide your engagement number

Sincerely,

Julie McCauley
Vice President of Human Resources | Smead x U Brands
smead.com | ubrands.com

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring and Identity Restoration

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 months. 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. 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 24 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 24-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:

- Ensure that you **enroll by June 30, 2023** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: www.experianidworks.com/credit
- Provide your **activation code: ABCDEFGHI**

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 833-514-1448 by June 30, 2023. Be prepared to provide engagement number **B087308** as proof of eligibility for the Identity Restoration services by Experian.

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 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, 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 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
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 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. Smead Manufacturing Company is located at 600 Smead Boulevard, Hastings, MN 55033.

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 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.