

RECEIVED

AUG 30 2021

CONSUMER PROTECTION



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

August 25, 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 Source4 located at 19520 W. Catawba Ave., Suite 113, Cornelius, NC 28031, and write to notify your office of an incident that may affect the security of some personal information relating to one (1) New Hampshire resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Source4 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 or about June 28, 2021, Source4 became aware of anomalous activity on its network. As part of the response, Source4 immediately launched an investigation which included working with a forensic investigation firm to determine the full nature and scope of the incident. Although the investigation remains ongoing, it appears that certain files and folders may have been accessed without authorization. These files were then reviewed to determine what information may have been accessible and to whom that information might relate. Upon completion of these efforts, Source4 moved to notify those whose information may potentially have been impacted.

The information that may have been in the potentially impacted files includes name, address, and Social Security number.

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### **Notice to New Hampshire Resident**

On or about August 25, 2021, Source4 provided written notice of this incident to potentially affected individuals, which includes 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**

Upon discovering the event, Source4 moved quickly to investigate and respond to the incident, assess the security of Source4 systems, and notify potentially affected individuals. Source4 is also working to implement additional safeguards and training to its employees. Source4 is providing 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, Source4 is providing potentially 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. Source4 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) 930-4786.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Ryan Loughlin", with a stylized flourish at the end.

Ryan C. Loughlin of  
MULLEN COUGHLIN LLC

RCL/mzb

# EXHIBIT A



Return Mail Processing  
PO Box 999  
Suwanee, GA 30024

11183\*\*\*\*\*SNGLP

SAMPLE A. SAMPLE - NON-MA

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



August 25, 2021

Dear Sample A. Sample:

Source4 writes to notify you of a recent incident that may impact the security of some of your personal information. Although Source4 is unaware at this time of any actual or attempted misuse of any personal information, we are providing you with details about the incident, our response, and steps you can take to better protect your personal information, should you feel it appropriate to do so.

**What Happened?** On June 28, 2021, Source4 became aware of anomalous activity on our network. As part of the response, we immediately launched an investigation which included working with a forensic investigation firm to determine the scope of the incident. It appears that certain files and folders may have been accessed without authorization.

We do not have evidence that such access, if any, resulted in attempted or actual misuse of any personal information. We are providing you this notification out of an abundance of caution.

**What Information Was Involved?** The investigation determined that the potentially impacted files may have included your first and last name and the following: [Extra1].

**What We Are Doing.** Information privacy and security are among our highest priorities. Upon learning of this incident, we quickly took steps to confirm the security of our systems. We are conducting a comprehensive investigation into the network security incident. Source4 took several actions to enhance security policies, procedures, and infrastructure. As a precaution, we are also notifying potentially impacted individuals and providing guidance as to steps individuals may take to protect their information, should they feel it is appropriate.

As an added precaution, we are offering access to credit monitoring and identity theft protection services without cost to you for 12 months. Enrollment instructions are included in the "Steps You Can Take to Protect Personal Information" section of this letter.

**What You Can Do.** While we are unaware of misuse of information relating to you, we encourage you to remain vigilant against incidents of identity theft and fraud and to review the information in the attached "Steps You Can Take to Protect Personal Information". You may also activate the credit monitoring and identity monitoring services we are making available to you. Source4 will cover the cost of this service. Because the activation process does not allow us to activate on your behalf, you will need to activate yourself by following the instructions outlined in this letter.

**For More Information.** For further information, please call (833) 671-0411 (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 B017153. We take the protection of all data we maintain very seriously and apologize for any inconvenience. We trust that the services we are offering to you demonstrate our continued commitment to your security and satisfaction

Sincerely,

Source4 Management

## STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

### Enroll in Credit Monitoring through Experian Identityworks:

As an added precaution, we are offering a complimentary 12-month membership of Experian's® 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: **October 31, 2021** (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: [REDACTED]
- Provide your activation code: [REDACTED]

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 [REDACTED] by **October 31, 2021**. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

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<sup>\*\*</sup>:** 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 [REDACTED]. 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 12 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](http://www.ExperianIDWorks.com/restoration). You will also find self-help tips and information about identity protection at this site.

### 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](http://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,

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\* 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.

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:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/help/">https://www.experian.com/help/</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
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; [www.identitytheft.gov](http://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](http://www.oag.state.md.us). Source4 may be contacted at 19520 W. Catawba Ave., Suite 113, Cornelius, NC 28031.

*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](http://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](http://www.riag.ri.gov); 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 is 1 Rhode Island resident impacted by this incident.