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CONSUMER PROTECTION



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October 10, 2022

**VIA U.S. CERTIFIED MAIL**

Consumer Protection Division  
Office of the New Hampshire Attorney General  
33 Capitol Street  
Concord, NH 03301

**RE: Tudor Realty Services Corp. - Notice of Data Event**

Dear Sir or Madam:

We represent Tudor Realty Services Corp. ("TRSC"), which provides residential property management and brokerage services located in New York, New York. This submission is provided pursuant to the New Hampshire Data Breach Notification Statute of 2007, N.H. REV. STAT. §359-C:19(V), which requires notice to your office in the event of a breach in the security of personal information affecting residents of the State of New Hampshire.

TRSC recently learned of suspicious email activity involving an employee email account. TRSC commenced an investigation into the activity that included partnering with computer forensic specialists. The investigation identified unauthorized access to certain employee email accounts at various times between January 26, and April 21, 2022, by someone outside the TRSC organization. TRSC then worked with the forensic specialists to conduct a comprehensive review of the mailboxes to determine what personal information, if any, was contained therein that could have been accessed or taken. TRSC finalized the review on September 12, 2022. While TRSC received no indication that any personal information was viewed or taken, it is notifying potentially affected individuals out of an abundance of caution. The types of personal information impacted include client name, date of birth and Social Security number.

On or about October 7, 2022, TRSC provided notice via U.S. regular mail of the incident to the potentially affected individuals. A sample copy of the notice is attached as Exhibit "A" for

your records. TRSC provided this notification to a total of 2,162 individuals, one (1) of which is a resident of the State of New Hampshire.

The notice to the affected individuals includes encouragement to remain vigilant for incidents of fraud or misuse, by reviewing and monitoring account statements and credit reports, immediately reporting errors or suspicious activity to the financial institution or issuing bank, and filing a report with law enforcement, their state attorney general, and/or the Federal Trade Commission in the event fraud or misuse is discovered. TRSC also included contact information for the major consumer reporting bureaus, state-specific regulators, and additional steps individuals may take to protect the impacted information from misuse, should they find it appropriate to do so. As an additional precautionary measure, TRSC offered those affected individuals whose Social Security numbers were potentially accessed, (12) months of credit monitoring and identity restoration services through Experian.

After discovering the incident, TRSC reset passwords and implemented multi-factor authentication for all logins to TRSC email accounts. TRSC partnered with computer forensics professionals to thoroughly investigate the incident. In addition, TRSC is reviewing its existing security measures in place for enhancements to best prevent a similar incident from occurring in the future. TRSC is also notifying other state regulators as necessary.

I believe this provides you with all information necessary for your purposes and to comply with New Hampshire law. However, if anything further is needed, please contact me directly.

Respectfully,

**FREEMAN MATHIS & GARY, LLP**

*/s/ Nicholas Jajko*

Nicholas Jajko

# Exhibit “A



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

October 7, 2022

i4183-L01-0000001 T00001 P001 \*\*\*\*\*SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 1 YEAR  
APT ABC  
123 ANY STREET  
ANYTOWN, ST 12345-6789



Re: Notice of Data Breach

Dear Sample A. Sample:

At Tudor Realty Services Corp. ("TRSC"), we take the issue of privacy seriously. As part of that commitment, we are notifying you of a recent data security incident that may have affected your personal information. Please read this letter carefully.

### What Happened

TRSC recently learned of suspicious email activity involving an employee email account. TRSC commenced an investigation into the activity that included partnering with computer forensic specialists. The investigation identified unauthorized access to certain employee email accounts at various times between January 26, 2022 and April 21, 2022, by someone outside the TRSC organization. We then worked with the forensic specialists to conduct a comprehensive review of the mailboxes to determine what personal information, if any, was contained therein that could have been accessed or taken. We finalized the comprehensive review on September 12, 2022. We have received no indication that any information about you was viewed or taken. We are now notifying potentially affected individuals out of an abundance of caution.

### What Information Was Involved

You are receiving this letter because, based on our review, there was the potential for unauthorized access to and/or acquisition of your personal information, including your: [Extra1]. We reiterate, however, that we have no indication that any information about you has been misused but we are notifying potentially affected individuals out of an abundance of caution.

### What We Are Doing

Upon learning of the suspicious activity, we immediately undertook an investigation into our email system with the guidance and assistance of cybersecurity specialists. We worked to identify the scope of the incident and to ensure the security of our system and data. We have since changed the password to all user accounts and implemented multi-factor authentication to prevent future unauthorized access. We also reported the incident to federal law enforcement and continue to review our policies and procedures for ways to enhance the existing protections we have in place for our organization.

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As an additional precautionary measure to help protect your information, we are offering a complimentary one (1) year membership of credit monitoring and identity restoration assistance from Experian, at no cost to you. The offered services include: An Experian credit report at signup, credit monitoring, identity restoration, Experian IdentityWorks ExtendCARE™, and up to \$1 Million Identity Theft Insurance. Please refer to the enclosed documentation for additional information and enrollment instructions.

### **What You Can Do**

We encourage you to remain vigilant for incidents of fraud or misuse, from any source, by reviewing and monitoring your account statements and credit reports. We recommend you report errors or suspicious activity to your financial institution or issuing bank immediately. You also may file a report with law enforcement, your state attorney general, and/or the Federal Trade Commission. Please refer to the enclosed documentation titled "Additional Steps to Help Protect Your Information" for contact information and resources you may take advantage of to protect against fraud or misuse, should you find it appropriate to do so.

### **For More Information**

We are very sorry for any concern or inconvenience this incident has caused or may cause you. If you have any other questions or concerns that you would like to discuss, you may contact us at **(833) 575-2859**, toll-free Monday through Friday from 9 am – 11 pm Eastern, or Saturday and Sunday from 11 am – 8 pm Eastern (excluding major U.S. holidays). Please have your engagement number [REDACTED] on hand to allow our call center operatives to assist you.

Sincerely,

Howard Lazarus  
Managing Director

Anthony Colella  
Managing Director

Mary Frances Shaughnessy  
Managing Director

## ADDITIONAL STEPS TO HELP PROTECT YOUR INFORMATION

**Take Advantage of Offered Services.** To help protect your identity, we are offering complimentary access to Experian IdentityWorks<sup>SM</sup> for twelve (12) 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 twelve (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).

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 12-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 DECEMBER 31, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: [www.experianidworks.com/credit](http://www.experianidworks.com/credit)
- Provide your **activation code**:

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) 575-2859 by December 31, 2022**. Please be prepared to provide engagement number [REDACTED] as proof of eligibility for the Identity Restoration services by Experian.

**Review personal account statements and credit reports.** We recommend that you remain vigilant by reviewing personal account statements and monitoring credit reports to detect any errors or unauthorized activity. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to [www.annualcreditreport.com](http://www.annualcreditreport.com) or call (877) 322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months. If you discover any suspicious items, you should report any incorrect information on your report to the credit reporting agency. The names and contact information for the credit reporting agencies are:

Equifax  
1-888-280-0045  
P.O. Box 105069  
Atlanta, GA 30348  
[www.equifax.com](http://www.equifax.com)

Experian  
1-888-397-3742  
P.O. Box 9554  
Allen, TX 75013  
[www.experian.com](http://www.experian.com)

TransUnion  
1-800-680-7289  
P.O. Box 2000  
Chester, PA 19022  
[www.transunion.com](http://www.transunion.com)

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**Report suspected fraud.** You have the right to file a police report if you ever experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You should report suspected incidents of identity theft to local law enforcement, your state's Attorney General, and/or the Federal Trade Commission.

**Place Fraud Alerts.** A fraud alert tells businesses that check your credit that they should check with you before opening a new account. When you place a fraud alert, it will last one year, instead of 90 days. Fraud alerts will still be free and identity theft victims can still get an extended fraud alert for seven years. If you choose to place a fraud alert, we recommend you do this after activating your credit monitoring. To place a security freeze, contact the nationwide credit reporting agencies by phone or online. For more information, visit <https://www.consumer.ftc.gov/articles/0275-place-fraud-alert>.

**Place a Security Freeze.** Security freezes, also known as credit freezes, restrict access to your credit file, making it harder for identity thieves to open new accounts in your name. You can freeze and unfreeze your credit file for free. You also can get a free freeze for your children who are under 16. And if you are someone's guardian, conservator or have a valid power of attorney, you can get a free freeze for that person, too. To place a security freeze, contact the nationwide credit reporting agencies by phone or online. If you request a freeze online or by phone, the agency must place the freeze within one business day. If you request a lift of the freeze, the agency must lift it within one hour. If you make your request by mail, the agency must place or lift the freeze within three business days after it gets your request. You also can lift the freeze temporarily without a fee. Also, do not confuse freezes with locks. They work in a similar way, but locks may have monthly fees. If you want a free freeze guaranteed by federal law, then opt for a freeze, not a lock. For more information, visit <https://www.consumer.ftc.gov/articles/0497-credit-freeze-faqs>.

**Change Online Account Credentials.** If the information involved in this incident included credentials used to access any of your online accounts, such as a username, password, PIN, or answer security question, you should promptly change your username, password, PIN, security question and answer, or other access credentials and take other appropriate steps to protect all online accounts for which you use the same credentials.

**Obtain additional information** about the steps you can take to avoid identity theft from the following entities:

- **California Residents:** Visit the California Office of Privacy Protection, [www.privacy.ca.gov](http://www.privacy.ca.gov), for additional information on protection against identity theft
- **District of Columbia Residents:** District of Columbia Attorney General may be contacted at 400 6th Street NW, Washington D.C. 20001, <https://oag.dc.gov/> and (202) 727-3400.
- **Maryland Residents:** Office of Attorney General of Maryland, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, [www.oag.state.md.us/Consumer](http://www.oag.state.md.us/Consumer), (888) 743-0023.
- **New York Residents:** New York Attorney General may be contacted at Office of Attorney General, The Capitol, Albany, NY 12224-0341, <https://ag.ny.gov>, and (800) 771-7755.
- **North Carolina Residents:** Office of the Attorney General of North Carolina, 9001 Mail Service Center, Raleigh, NC 27699-9001, [www.ncdoj.gov](http://www.ncdoj.gov), (919) 716-6400.
- **Rhode Island Residents:** Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, [www.riag.ri.gov](http://www.riag.ri.gov), (401) 274-4400. There is at least one (1) Rhode Island resident impacted by this incident.
- **All US Residents:** Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, [www.consumer.ftc.gov](http://www.consumer.ftc.gov), 1-877-IDTHEFT (438-4338). This notification was not delayed by law enforcement.

**Know Your Rights Under the Fair Credit Reporting Act.** The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. You have certain rights under the FCRA, which you can read about by visiting <https://www.consumer.ftc.gov/articles/0070-credit-and-your-consumer-rights>. These rights include: (1) You must be told if information in your file has been used against you; (2) You have the right to know what is in your file (you “file disclosure”); (3) You have the right to ask for a credit score; (4) You have the right to dispute incomplete or inaccurate information; (5) Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; (6) Consumer reporting agencies may not report outdated negative information; (7) Access to your file is limited to people with a valid need; (8) You must give your consent for reports to be provided to employers; (8) You may limit “prescreened” offers of credit and insurance you get based on information in your credit report; (9) You may seek damages from violators; and (10) identity theft victims and active duty military personnel have additional rights. For more information, visit [www.ftc.gov/credit](http://www.ftc.gov/credit). States may enforce the FCRA, and many states have their own consumer reporting laws. In some cases, you may have more rights under state law. For more information, contact your state or local consumer protection agency or your state Attorney General.



#### **ADDITIONAL DETAILS REGARDING YOUR 12 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 ExtendCARE™:** 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.

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