



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

DEC 02 2022

CONSUMER PROTECTION

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75 S. Clinton Avenue, Suite 510
Rochester, NY 14604

November 28, 2022

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 Vaupell Holdings, Inc. ("Vaupell") located at 11323 Commando Road West, Suite 101, Everett, Washington 98204-3533, and are writing to notify your office of an event that may affect the security of certain personal information relating to one hundred thirty-four (134) New Hampshire residents. The investigation into this matter is ongoing, and this notice will be supplemented if and when any new significant facts learned subsequent to its submission. By providing this notice, Vaupell does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data breach notification statute, or personal jurisdiction.

Nature of the Data Event

On October 15, 2022, Vaupell identified malware on certain computer systems in its environment. Upon becoming aware, Vaupell promptly took steps to secure the environment and began an investigation to determine the scope and nature of the event. After a comprehensive review, on or about November 4, 2022, Vaupell determined that certain information about potentially affected individuals may have been accessed and/or acquired as part of the event. The information that could have been subject to unauthorized access includes name and Social Security number.

Notice to New Hampshire Residents

On or about November 28, 2022, Vaupell provided written notice of this event to one hundred thirty-four (134) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

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Other Steps Taken and To Be Taken

Upon discovering the event, Vaupell promptly moved to investigate and respond to the event, assess the security of Vaupell systems, and identify potentially affected individuals. Further, Vaupell notified federal law enforcement regarding the event, and is working to implement additional safeguards. Vaupell is also providing complimentary access to credit monitoring services for two (2) years, through Experian, to all potentially affected individuals.

Additionally, Vaupell 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. Vaupell is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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.

Vaupell is also 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 (267) 930-4741.

Very truly yours,

James Paulino of
MULLEN COUGHLIN LLC

JMP/cob
Enclosure

EXHIBIT A



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

November 28, 2022



i6096-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345

SAMPLE A SAMPLE - L01 ADULT

APT ABC

123 ANY STREET

ANYTOWN, ST 12345-6789



[Extra1]

Dear Sample A. Sample:

Vaupell Holdings, Inc. ("Vaupell") writes to inform you as a current or former employee of an event that could affect the privacy of some of your information. This notice provides information about the event, our response, and resources available to you to help protect your information from possible misuse. We are also providing all potentially impacted individuals with two (2) years of complimentary credit monitoring with identity theft protection at no cost, as discussed below.

What Happened? On October 15, 2022, we identified malware on certain computer systems in our environment. We promptly took steps to secure the environment and began an investigation to determine the scope and nature of the event. After completing a comprehensive review, on or about November 4, 2022, we determined that certain information about you may have been accessed and/or acquired as part of the event.

What Information Was Involved? Our investigation has not definitively determined your information was accessed and/or acquired; however, we wanted to provide you this notice and access to credit monitoring services in an abundance of caution. We have determined following types of information relating to you were present in impacted systems and may be at risk: name, address; [Extra2].

What We Are Doing. Data privacy and security are among our highest priorities, and upon learning of this matter we promptly commenced an investigation to confirm the nature and scope of the event. As part of our ongoing commitment to the security of information, we are also reviewing and enhancing policies and procedures, implementing additional safeguards, and conducting workforce training to reduce the likelihood of a similar event in the future. As an added precaution, we are also offering you complimentary access to two (2) years of credit monitoring and identity theft restoration services, through Experian. You will need to enroll yourself in these services if you wish to do so, as we are not able to activate them on your behalf. Please review the instructions contained in the attached *Steps You Can Take to Protect Personal Information* for additional information on these services.

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. You may also review the enclosed *Steps You Can Take to Protect Personal Information* for additional steps you may take and information on what you can do to better protect against the possibility of identity theft and fraud. We also encourage you to enroll in the complimentary credit monitoring we are offering you.



For More Information. If you have questions about this letter, please call **(833) 708-2893** toll-free Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays) Please be prepared to provide your engagement number

Sincerely,

Vaupell Holdings, Inc.

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

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 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 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 February 28, 2023** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: 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) 708-2893 by **February 28, 2023**. Be prepared to provide engagement number 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 a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. 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 victims 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, they may 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 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 made 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 security freeze, consumers may need to provide some or all of the following information:



Full name (including middle initial as well as Jr., Sr., II, III, etc.);
 Social Security number;
 Date of birth;
 Addresses for the prior two to five years;
 Proof of current address, such as a current utility bill or telephone bill;
 A legible photocopy of a government-issued identification card (state driver's license or ID card, etc.); and
 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 consumers 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	888-397-3742	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

Internal Revenue Service Identity Protection PIN (IP PIN)

You may also obtain an Identity Protection PIN (IP PIN) from the Internal Revenue Service, a six-digit number that prevents someone else from filing a tax return using your Social Security number or Individual Taxpayer Identification Number. The IP PIN is known only to you and the IRS, and helps the IRS verify your identity when you file your electronic or paper tax return. Even though you may not have a filing requirement, an IP PIN still protects your account. If you do not already have an IP PIN, you may get an IP PIN as a proactive step to protect yourself from tax-related identity theft either online, by paper application or in-person. Information about the IP PIN program can be found here: <https://www.irs.gov/identity-theft-fraud-scams/get-an-identity-protection-pin>.

Additional Information

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect their 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, 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. 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 the 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. Vaupell Holdings, Inc. is located at 11323 Commando Rd. West, Everett, WA 98204.

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.

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.

