

AUG 0 2 2022

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3001 N. Rocky Point Drive East, Suite 200 Tampa, FL 33607

July 29, 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

Dear Sir or Madam:

We represent WSRP, LLC ("WSRP") located at 155 N 400 W STE 400, Salt Lake City, UT 84103, and are writing to notify your office of an incident that may affect the security of certain information relating to two (2) New Hampshire residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, WSRP 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 June 14, 2022, WSRP was made aware of fraudulent tax return filings related to certain individuals. WSRP began to review its systems and subsequently identified suspicious activity relating to a single system within its network. WSRP worked quickly to secure the system and launched an investigation with the assistance of third-party computer specialists to determine the full nature and scope of any unauthorized activity. Through the investigation, WSRP determined that an unauthorized actor gained access to this system at various times from April 21, 2022 until April 28, 2022, and again on May 26, 2022. During the period of unauthorized access, the investigation determined that certain files were downloaded without authorization. WSRP reviewed these files to determine the nature of the files and identify individuals contained within the same, and locate address information for affected individuals. This review was completed on July 14, 2022.

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The types of information that may have been contained within the downloaded files includes name, Social Security number, driver's license or state identification card number, and financial account information.

## Notice to New Hampshire Residents

On or about July 29, 2022, WSRP provided written notice of this incident to two (2) 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, WSRP investigated and responded to the incident, assessed the security of WSRP systems, and identified potentially affected individuals. WSRP is also working to implement additional safeguards and training to its employees. WSRP is providing access to credit monitoring services for one (1) year, through Equifax, to individuals whose personal information may have been contained in the downloaded files, at no cost to these individuals.

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

WSRP is also providing written notice of this incident to relevant state and federal 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) 930-2190.

Very truly yours,

Kevin M. Mekler of MULLEN COUGHLIN LLC

KMK/klh Enclosure

# **EXHIBIT A**



Return Mail Processing Center P.O. Box 6336 Portland, OR 97228-6336

```
<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>>, <<State>> <<Zip>>>
<<Country>>
```

<<Date>>

<<Variable Header>>

Dear << Name 1>>:

WSRP, LLC ("WSRP") is writing to notify of an incident that may affect the privacy of some of your information. We are providing you with information regarding the incident, our response to it, and resources available to you to help better protect your information, should you feel it appropriate to do so.

What Happened? On June 14, 2022, WSRP was made aware of fraudulent tax return filings related to certain individuals. We began to review our systems and subsequently identified suspicious activity relating to a single system within our network. We worked quickly to secure the system and launched an investigation with the assistance of third-party computer specialists to determine the full nature and scope of any unauthorized activity. Through the investigation, we determined that an unauthorized actor gained access to this system at various times from April 21, 2022 until April 28, 2022, and again on May 26, 2022. During the period of unauthorized access, our investigation determined that certain files were downloaded without authorization. We reviewed these files to determine the nature of the files and identify individuals contained within the same, and locate address information for affected individuals. This review was completed on July 14, 2022.

What Information Was Involved? One or more of the following elements related to you may have been contained within the downloaded files if previously provided to WSRP: name, Social Security number, driver's license or state identification card number, passport number, military identification number, other government issued identification number, financial account information, date of birth, electronic signature, medical information, and health insurance information.

What We Are Doing. We take this event and the security of information in our care seriously. As part of our ongoing commitment to the privacy of information in our care, we implemented additional technical security measures to mitigate reoccurrence of this type of event. Further, we are also reviewing and enhancing existing policies and procedures and conducting additional workforce data privacy training.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and free credit reports for suspicious activity and to detect errors. We also recommend you review the "Steps You Can Take to Protect Personal Information" section of this letter. Further, you may enroll in the offered complimentary credit monitoring and identity protection services.

For More Information. If you have additional questions you may contact us by phone at 801-328-2011 or by email at info@wsrp.com. You may also write to us at WSRP, LLC at 155 N 400 W, STE 400, Salt Lake City, Utah 84103.

Sincerely,

WSRP, LLC

#### STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

## **Enroll in Credit Monitoring**



Enter your Activation Code: << ACTIVATION CODE>> Enrollment Deadline: << Enrollment Deadline>>

## Equifax Credit Watch™ Gold

\*Note: You must be over age 18 with a credit file to take advantage of the product

#### **Key Features**

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications<sup>1</sup> when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts<sup>2</sup>, which encourages potential lenders to take extra steps to verify your identity before
  extending credit, plus blocked inquiry alerts and Equifax credit report lock<sup>3</sup>
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft<sup>4</sup>

### **Enrollment Instructions**

Go to www.equifax.com/activate

Enter your unique Activation Code of << ACTIVATION CODE>> then click "Submit" and follow these 4 steps:

## 1. Register:

Complete the form with your contact information and click "Continue".

If you already have a myEquifax account, click the 'Sign in here' link under the "Let's get started" header. Once you have successfully signed in, you will skip to the Checkout Page in Step 4

#### 2. Create Account:

Enter your email address, create a password, and accept the terms of use.

### 3. Verify Identity:

To enroll in your product, we will ask you to complete our identity verification process.

### 4. Checkout:

Upon successful verification of your identity, you will see the Checkout Page.

Click 'Sign Me Up' to finish enrolling.

#### You're done!

The confirmation page shows your completed enrollment.

Click "View My Product" to access the product features.

<sup>1 1</sup> WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded.

<sup>&</sup>lt;sup>2</sup> The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

<sup>&</sup>lt;sup>3</sup> Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com

<sup>&</sup>lt;sup>4</sup> The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

## 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 <a href="https://www.annualcreditreport.com">www.annualcreditreport.com</a> 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-		https://www.transunion.com/credit-
report-services/	https://www.experian.com/help/	help
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069	Experian Fraud Alert, P.O. Box	TransUnion Fraud Alert, P.O. Box
Atlanta, GA 30348-5069	9554, Allen, TX 75013	2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788	Experian Credit Freeze, P.O.	TransUnion Credit Freeze, P.O.
Atlanta, GA 30348-5788	Box 9554, Allen, TX 75013	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; <a href="www.identitytheft.gov">www.identitytheft.gov</a>; 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 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 Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providen 2, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any policies in regard to this incident. There are 4 Rhode Island residents impacted by this incident.

