



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

NOV 21 2022

CONSUMER PROTECTION

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4870 Sadler Road, Suite 300
Glen Allen, VA 23060

November 16, 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 AAA Collections, Inc., dba Advanced Asset Alliance ("AAA") located at 3500 S. 1st Avenue, Suite 100, Sioux Falls, SD 57105, and are writing to notify your office of an incident that may affect the personal information of seven (7) New Hampshire residents. 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, AAA 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 September 7, 2022, AAA learned that it experienced a cyber event. AAA promptly took steps to secure its systems and commenced an investigation into the nature and scope of the event. AAA has been working diligently to investigate this incident and confirm any information that may be affected. Through the investigation, AAA determined that certain documents stored within AAA's environment were copied from the system as part of the cyber event between September 5, 2022, and September 7, 2022. Based on the investigation, AAA conducted a detailed review of the data involved to determine the type of information present and to whom it related. This process was completed on October 24, 2022. 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 16, 2022, AAA provided written notice of this incident to seven (7) 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, AAA moved quickly to investigate and respond to the event, assess the security of AAA systems, and identify potentially affected individuals. Further, AAA notified federal law enforcement regarding the event. AAA is also working to implement additional safeguards and training to its employees. AAA is providing access to credit monitoring services for twelve (12) months, through IDX, to individuals whose personal information was potentially affected by this event, at no cost to these individuals.

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

AAA is providing written notice of this incident to relevant state regulatory authorities, as required, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification, please contact me at (267) 930-5327.

Very truly yours,

Elizabeth Dill of
MULLEN COUGHLIN LLC

ERD/jlm
Enclosure

EXHIBIT A



P.O Box 989728
West Sacramento, CA 95798-9728

To Enroll, Please Call:
(833) 896-5123
Or Visit:
<https://response.idx.us/aaa>
Enrollment Code: <<Enrollment Code>>

<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

November 16, 2022

NOTICE OF <<SECURITY INCIDENT/DATA BREACH>>

Dear <<First Name>> <<Last Name>>:

AAA Collections, Inc. (“AAA”), an accounts receivable management company, is notifying you of an incident that may affect some of your information. We are writing to provide you with information about the incident, our response, and steps you may take to protect your personal information, should you feel it appropriate to do so.

What Happened? On September 7, 2022, AAA learned that it experienced a cyber incident. We promptly took steps to secure our systems and commenced an investigation into the nature and scope of the incident. We have been working diligently to investigate this incident and confirm any information that may be affected. Through the investigation, we determined that certain documents stored within AAA’s environment were copied from the system as part of the cyber incident between September 5, 2022, and September 7, 2022. Based on the investigation, AAA conducted a detailed review of data involved to determine the type of information present and to whom it related. This process has been ongoing and was recently completed on October 24, 2022. AAA is now working to provide notice to those individuals whose information was potentially affected. You are receiving this notice because we determined that your information may be affected.

What Information Was Involved? The information that may have been impacted by this incident may potentially include your name and <<Data Elements>>.

What We Are Doing. The confidentiality, privacy, and security of information within our care are among AAA’s highest priorities. Upon learning of the event, we promptly took steps to secure our systems and investigate the full scope of the incident. While our investigation of and response to the event are ongoing, we have taken additional steps to further enhance the security of our systems. In an abundance of caution, we are also notifying potentially affected individuals, including you, and providing information on steps you may take to protect your information, should you feel it is appropriate to do so. We are also offering you access to credit monitoring and identity protection services at no cost to you. Information on how to enroll in these services may be found in the attached “*Steps You Can Take to Help Protect Your Information.*”

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. We also encourage you to review the information contained in the attached “*Steps You Can Take to Help Protect Your Information*” and to enroll in the credit monitoring and identity protection services we are making available to you.

In addition, we are offering identity theft protection services through IDX, the data breach and recovery services expert. IDX identity protection services include: <<12/24 months>> of Single-Bureau credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

For More Information. If you have additional questions, please call our dedicated assistance line at (833) 896-5123 or go to <https://response.idx.us/aaa> and use the Enrollment Code provided above. Representatives are available Monday through Friday from 8 am - 8 pm Central Time (excluding U.S. holidays). Please note the deadline to enroll is February 16, 2023.

Sincerely,

AAA Collections, Inc.

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit Monitoring

1. **Website and Enrollment.** Go to <https://response.idx.us/aaa> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.
2. **Activate the credit monitoring** provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.
3. **Telephone.** Contact IDX at (833) 896-5123 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

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 one-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 credit 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	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; 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 District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and oag.dc.gov.

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. AAA is located at 3500 S. 1st Avenue, Suite 100, Sioux Falls, SD 57105.

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.