



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

APR 29 2019

CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302
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April 25, 2019

INTENDED FOR ADDRESSEE(S) ONLY

VIA U.S. MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Attorney General MacDonald:

We represent Abel HR located at 2 Corporate Drive, Cranbury, NJ 08512, and are writing to notify your office of an incident that may affect the security of some personal information relating to 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, Abel HR 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 November 26, 2018, Abel HR became aware of suspicious activity relating to one of its employee's email accounts when email messages began to be automatically forwarded from the email account to an unauthorized outside email account. Abel HR quickly changed the password for the account to ensure that any unauthorized access to the account was ended. They immediately launched an investigation with assistance from an outside computer forensics specialist, and on December 20, 2018, the investigation confirmed an unauthorized actor logged into the email account between November 11 - 26, 2018. While Abel HR's investigation could not confirm that any personal information was actually acquired by the actor, they decided to notify individuals in an abundance of caution because their information was present in the email account when this incident occurred.

Once the email account contents were confirmed to be at risk for unauthorized access or acquisition, Abel HR undertook a lengthy and labor-intensive process to identify personal information that was potentially exposed in relation to this incident, the impacted individuals to whom that information relates, and their address information so they could be notified about the incident.

While the type of protected personal information may vary by individual, the types of information impacted for New Hampshire residents include the following: name, Social Security number and passport number.

Notice to New Hampshire Residents

On or about April 25, 2019, Abel HR began mailing written notice of this incident to affected individuals, which includes four (4) 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, Abel HR moved quickly to investigate and respond to the incident, assess the security of their systems, and notify potentially affected individuals. Abel HR changed the login credentials for the impacted email account and is also working to implement additional safeguards and training to its employees.

Abel HR is providing access to credit monitoring and identity protection services for one (1) year, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Abel HR 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. Abel HR is also 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) 930-4801.

Very truly yours,



Alexander T. Walker of
MULLEN COUGHLIN LLC

ATW:mal
Enclosure

EXHIBIT A



April 24, 2019

E6127-L01-0123456 0001 00000002 *****MIXED AADC 159
SAMPLE A SAMPLE - L01 Individual 48 State Abel HR



APT 123
123 ANY ST
ANYTOWN, US 12345-6789



Re: Notice of Data Breach

Dear Sample,

Abel HR is reaching out to make you aware of an incident that may impact the security of some of your personal information. While there is no evidence that your information has been misused, we are making you aware of the event, what we are doing in response, and the steps you may take to better protect against possible misuse of your personal information, should you feel it is appropriate to do so.

What Happened? On November 26, 2018, Abel HR became aware of suspicious activity relating to one of our employee's email accounts when email messages began to be automatically forwarded from the email account to an unauthorized outside email account. We quickly changed the password for the account to ensure that any unauthorized access to the account was ended. We immediately launched an investigation with assistance from an outside computer forensics specialist, and on December 20, 2018, the investigation confirmed an unauthorized actor logged into the email account between November 11 - 26, 2018. While our investigation could not confirm that your information was actually acquired by the actor, we are notifying you in an abundance of caution because your information was present in the email account when this incident occurred.

What Information Was Involved? While we have no evidence that any of your information has been misused, our investigation confirmed that during the period of unauthorized access, the affected email account contained the following types of your personal information: Exposed Data Element 1, Exposed Data Element 2, Exposed Data Element 3 and name.

What Are We Doing? We take this incident and the security of personal information in our care very seriously. We quickly changed the log-in credentials for the impacted email account, and we are also providing training to our employees to protect against similar incidents in the future. Additionally, as part of our ongoing commitment to the security of personal information in our care, we are working to review our existing information security procedures and to implement additional safeguards to further secure the information on our systems.

As an added precaution, Abel HR is offering you access to MM months of free credit monitoring and identity protection services through Experian. Details of these services and instructions on how to enroll to receive them are enclosed within.

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What Can You Do? You can review the enclosed *Steps You Can Take to Protect against Identity Theft and Fraud*. You can also enroll to receive the free Experian services being offered to you.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If so, you may contact our dedicated assistance line at (877) 215-8731 on Monday through Friday between the hours of 6 A.M to 4 P.M PST.

Again, Abel HR takes the privacy and security of the information in our care seriously. We sincerely regret any inconvenience or concern this incident has caused you.

Sincerely,

James W. Bell Sr.

James W. Bell Sr.
President

Steps You Can Take to Protect against Identity Theft and Fraud:

Enroll in complimentary identity protection services: To help protect your identity, we are offering a complimentary MM month membership of Experian's® IdentityWorksSM. 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:** July 31, 2019 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code:** ABCDEFGHI

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 877.890.9332 by July 31, 2019. Be prepared to provide engagement number DB11897 as proof of eligibility for the identity restoration services by Experian.

Additional details regarding your MM-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 agents are immediately available to help you address credit and non-credit related fraud.
- ◆ **Experian IdentityWorks ExtendCARETM:** 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^{**}:** 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 877.890.9332. 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 MM 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. You will also find self-help tips and information about identity protection at this site.

Other Steps: We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

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You have the right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security 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 security 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 security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian PO Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	TransUnion P.O. Box 2000 Chester, PA 19016 1-888-909-8872 www.transunion.com/credit-freeze	Equifax PO Box 105788 Atlanta, GA 30348-5788 1-800-685-1111 www.equifax.com/personal/credit-report-services
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In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your 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 agencies listed below:

Experian P.O. Box 2002 Allen, TX 75013 1-888-397-3742 www.experian.com/fraud/center.html	TransUnion P.O. Box 2000 Chester, PA 19016 1-800-680-7289 www.transunion.com/fraud-victim-resource/place-fraud-alert	Equifax P.O. Box 105069 Atlanta, GA 30348 1-888-766-0008 www.equifax.com/personal/credit-report-services
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Although we have no reason to believe that your personal information has been used to file fraudulent tax returns, you can contact the IRS at www.irs.gov/Individuals/Identity-Protection for helpful information and guidance on steps you can take to address a fraudulent tax return filed in your name and what to do if you become the victim of such fraud. You can also visit www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft for more information.

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338); 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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, www.ncdoj.gov.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us.

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 agencies 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-fera.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 can be reached at: 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, 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 one Rhode Island resident impacted by this incident.

