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October 12, 2021

**VIA EMAIL (doj-cpb@doj.nh.gov)**

Attorney General John Formella  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

Dear Attorney General Formella:

Pursuant to N.H. Rev. Stat. § 359-C20, we write on behalf of our client, ACE Surgical Supply Co., Inc. (“ACE” or the “Company”), to provide you with an update to our data security incident notification, dated July 28, 2021.

## **IDENTIFICATION OF PARTIES**

The entity that experienced the incident is ACE. ACE is a dental surgical supply company that manufactures dental products and is located at 1034 Pearl St., Brockton, MA 02301.

## **NATURE OF THE DATA SECURITY INCIDENT**

On Tuesday, June 29, 2021, ACE discovered that certain company files were accessed without authorization in a ransomware cyberattack. Upon discovering this incident, ACE began an investigation to understand the scope of the incident, secured the Company’s information technology systems, and contacted law enforcement (the Federal Bureau of Investigation). As set forth in our July 28 letter, ACE initially determined that three (3) New Hampshire residents were affected and provided notification and credit monitoring.

More recently, in September 2021, after investigation, ACE determined that the affected information that may have been obtained without authorization also included that of fifty-five (55) ACE customers who are New Hampshire residents. The affected customer information

included individual and/or business names, contact information, and DEA and physician state license numbers. Although it does not appear that this information fall within the definition of personal identifying information requiring notification, ACE is notifying the customers and offering them credit monitoring in an abundance of caution. Written notifications were sent via U.S. Mail to New Hampshire residents on October 6, 2021.

While ACE knows files were compromised, as of this time, we do not have any evidence that the information in those files has been made public or that any identify theft fraud has been committed to date. ACE's investigation is ongoing.

#### **NUMBER OF INDIVIDUALS AFFECTED**

**Newly-identified NH residents:** fifty-five (55)

**Total NH residents:** fifty-eight (58)

Notice has not been delayed due to a law enforcement investigation. A sample copy of the notice is attached hereto.

#### **STEPS ACE HAS TAKEN OR PLANS TO TAKE RELATING TO THE INCIDENT**

ACE has taken numerous steps necessary to address the incident. Upon discovery of the breach, ACE's cybersecurity team immediately took a series of actions, including a forensic investigation to confirm that no other company systems were impacted and to better understand the nature of the event, as well as hiring an outside forensic firm.

ACE will continue to implement security measures and team member education to protect against such attacks in the future.

#### **CREDIT MONITORING**

ACE is offering 24 months of identity theft and credit monitoring services to the affected New Hampshire residents free of charge. A sample of the letter sent to affected residents offering these services is attached hereto. A description of the services is available here: <https://www.experianidworks.com>.

#### **CONTACT INFORMATION**

The Office of the Attorney General may contact me at 212-225-2912 or [rmukhi@cgsh.com](mailto:rmukhi@cgsh.com) should you have any questions or need further information.

Respectfully submitted,



Rahul Mukhi

Attachment



1034 Pearl Street  
Brockton, MA 02301

[Date]

[Insert Recipient's Name]  
[Insert Address]  
[Insert City, State, Zip]

**RE: Notice of Data Breach**  
**Please read this entire letter.**

To [Insert Customer First & Last Name or Company Name]:

We write to inform you about a recent data security incident that involves some of your personal and/or business information. You are receiving this letter as a customer of ACE Surgical Supply Company, Inc. We take the protection of your information very seriously, and we are contacting you directly to explain the circumstances of the incident, the steps we are taking in response, and the resources we will make available to you.

### **What Happened?**

On Tuesday, June 29, 2021, we discovered that certain company files were accessed without authorization in a cyberattack. Upon discovering this incident, we began an investigation to understand the scope of the incident, secured the Company's information technology systems, and contacted law enforcement. More recently, in or about September 2021, as part of our continuing investigation, we discovered that certain files related to you and/or your business may have been obtained without authorization. While we know the files were compromised, as of this time, we do not have any evidence that the information in those files has been made public or that any identify theft fraud has been committed to date.

### **What Information Was Involved?**

Protecting your personal and business information is of utmost concern to us. As of now, we believe the affected customer information that may have been obtained without authorization included Assessment Questionnaire Practitioner Forms, which contained individual and/or business names, contact information, and DEA and physician state license numbers.

### **What We Are Doing To Protect Your Information:**

Please be assured that we have taken numerous steps to address the incident. Upon discovery of the breach, our cybersecurity team immediately took a series of actions, including a forensic investigation to confirm that no other company systems were impacted and to better understand the nature of the event.

To help protect your identity, we have worked with Experian, one of the leading credit and identity monitoring companies, to provide a complimentary 24-month membership of Experian's® IdentityWorks<sup>SM</sup>. This product provides you with identity detection and resolution tools. To activate this membership and start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by:** [enrollment end date] Your **activation code** will not work after this date.
- **Visit** the Experian IdentityWorks website to enroll: [URL]
- Provide your **activation code:** [code]

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 [customer service number] by **[enrollment end date]**. Be prepared to provide engagement number **[engagement #]** as proof of eligibility for the identity restoration services by Experian.

#### **ADDITIONAL DETAILS REGARDING THE 24-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 ExtendCARE™:** 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 personal information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at [customer service number]. 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 Identity Restoration support is available as part of the membership being provided by ACE at no cost to you and is effective from the date of this letter. Registration is not required to access the service provided by Experian's Identity Restoration Specialists. The Terms and Conditions for this offer are located at [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration). You will also find self-help tips and information about identity protection at this site.

#### **What You Can Do:**

We want to make sure you are aware of the additional steps you may take to guard against potential identity theft or fraud.

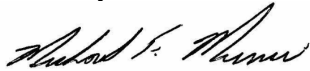
As we all know, cyberattacks increasingly threaten the security of information at work and at home. You should remain vigilant by reviewing account statements and monitoring free credit reports. Please see the attachment for further steps you can take to protect your personal information as well as additional important information. We also ask you to remain vigilant against any attack and to report any suspicious computer-related activity.

#### **For More Information:**

As noted, please see the attachment for further steps you can take to protect your personal and/or business information as well as additional important information.

We sincerely apologize for this incident and regret any inconvenience it may cause you and/or your business. Should you have questions or concerns regarding this matter, please contact Laurie McMullin, a member of the ACE Human Resource Team, at [LaurieMcMullin@ACEsurgical.com](mailto:LaurieMcMullin@ACEsurgical.com) or call (781) 534-5279.

Sincerely,



Michael Mancini  
General Manager and Chief Operating Officer

*\* 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.*

Attachment



## ATTACHMENT

### **What You Can Do:**

- Be on the alert for suspicious activity related to your accounts, credit report and financial products. We cannot exclude the possibility that third parties may attempt to use some of your personal information for financial gain.
- If you suspect an incident of identity theft has occurred, find suspicious activity on your credit reports or have reason to believe your information is being misused, file a police report and/or contact a major credit bureau, other local law enforcement, your state attorney general, or the Federal Trade Commission. Get a copy of any report as you may need it to clear up any fraudulent debts.
- Call one of the major credit bureaus listed below to place a fraud alert on your credit file. A fraud alert tells creditors to contact you before they open any new accounts or change your existing accounts. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts. The initial fraud alert stays on your credit report for 90 days. You can renew it after 90 days. You can obtain further information about fraud alerts and security freezes from the credit bureaus.
- You may also place a security freeze on your credit reports, free of charge. A security freeze generally requires submitting to the credit bureau your full name, address (including past addresses within the last five years), proof of current address, a legible photocopy of a government issued identification card, social security number, and date of birth. 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. A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services. Under federal law, you cannot be charged to place, lift, or remove a security freeze. You must place your request for a freeze with each of the three major consumer reporting agencies: Equifax ([www.equifax.com](http://www.equifax.com)); Experian ([www.experian.com](http://www.experian.com)); and TransUnion ([www.transunion.com](http://www.transunion.com)). To place a security freeze on your credit report, you may send a written request by regular, certified or overnight mail at the addresses below. You may also place a security freeze through each of the consumer reporting agencies' websites or over the phone, using the contact information below:
  - Equifax, P.O. Box 740241, Atlanta, GA 30348: [equifax.com](http://equifax.com) or 1-800-525-6285

- Experian, P.O. Box 4500, Allen, TX 75013: [experian.com](http://experian.com) or 1-888-397-3742
- TransUnion, P.O. Box 2000 Chester, PA 19022: [transunion.com](http://transunion.com) or 1-800-680-7289
- We also recommend you periodically request that credit reports from all available major credit bureaus be sent to you, free of charge, for your review. Checking your credit reports periodically can help you spot problems and address them quickly. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting agencies. To order your annual free credit report, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at 1-877-322-8228.
- You can obtain additional information about preventing identify theft, fraud alerts and security freezes from the Federal Trade Commission (“FTC”), 600 Pennsylvania Avenue, NW, Washington, DC 20580: 877-382-4357, <https://www.consumer.ftc.gov/topics/identity-theft>. You also have rights under the federal Fair Credit Reporting Act, which promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. The FTC has published a list of the primary rights created by the FCRA at <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.
- For Iowa Residents: You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.
- For New York Residents: Further information about security breach response and identity theft prevention and protection can be obtained from New York’s Office of the Attorney General, The Capitol, Albany, NY 12224-0341: 1 (800) 771-7755 or <https://ag.ny.gov/internet/privacy-and-identity-theft>.
- For Massachusetts Residents: You have a right to request from us a copy of any police report filed in connection with this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.
- For Maryland Residents: Further information about security breach response and identity theft prevention and protection can be obtained from Maryland’s Office of the Attorney General, 200 St. Paul Place, Baltimore, MD 21202: 410-576-6300 or <https://www.marylandattorneygeneral.gov/Pages/IdentityTheft/default.aspx>.
- For North Carolina Residents: Further information about preventing identity theft can be obtained from North Carolina’s Office of the Attorney General, 9001 Mail Service Center, Raleigh, NC 27699-9001: (919) 716-6000 or <https://ncdoj.gov/protecting-consumers/protecting-your-identity/protect-your-business-from-id-theft/security-breach-information/security-breach-advice/>.



- For Oregon Residents: You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.
- For Washington D.C. Residents: Further information about preventing identity theft can be obtained from the Office of the Attorney General for the District of Columbia, 400 6th Street, NW, Washington, DC 20001: 202-727-3400 or <https://oag.dc.gov/>.