



MULLEN
COUGHLIN^{LLC}

RECEIVED
JUL 12 2019
CONSUMER PROTECTION

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Wayne, PA 19087

July 8, 2019

VIA U.S. MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Attorney General MacDonald:

We represent The American Kennel Club (“AKC”), 101 Park Avenue, New York, New York 10178, and write to provide notice to your office of an incident that may affect the security of personal information relating to certain New Hampshire residents. This notice may be supplemented if significant facts are learned subsequent to its submission. By providing this notice, AKC does not waive any rights or defenses regarding the applicability of New Hampshire law, the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

On May 13, 2019, AKC became aware of a technical issue that allowed AKC employees and certain outside contractors unintended access to an internal Human Resources/Finance project management folder containing sensitive information relating to current and former AKC staff and, in some cases, their dependents/family members. AKC took immediate steps to repair the issue so that only intended authorized personnel can now access this information. AKC launched a thorough investigation into the incident to confirm what information, if any, may had been accessible.

AKC determined this technical issue existed between November 2018 and May 13, 2019, when AKC discovered and corrected the issue. Other than the single, isolated situation that led to AKC’s discovery of the issue, AKC is not aware of any other time when an unauthorized employee or outside contractor accessed the folder in question. AKC has no indication that this incident presents

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a risk of identity theft or financial harm to any individual. AKC is notifying potentially impacted individuals in an abundance of caution.

The types of personal information contained in the potentially exposed were name and Social Security number.

Notice to New Hampshire Residents

On July 5, 2019, AKC began mailing written notice of this incident to the affected individuals, including three (3) New Hampshire residents. Written notice will be provided in substantially the same form as the letter attached hereto as *Exhibit A*.

Other Steps Taken and to Be Taken

After discovering this incident, AKC began an investigation to determine the nature and scope of this incident, including identifying the individuals who may be affected, putting in place resources to assist them, and providing them with notice of this incident.

AKC is providing potentially affected individuals access to 24 months of credit monitoring and identity restoration services, through Experian. Additionally, AKC is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud, including 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 identity theft and fraud 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. AKC is also notifying other state regulators and the three major credit reporting agencies, as required by applicable laws.

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 Walker of
MULLEN COUGHLIN LLC

ATW:hpf
Enclosure

EXHIBIT A



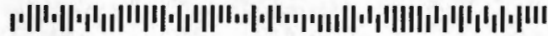
AMERICAN
KENNEL CLUB

PO Box 589
Claysburg, PA 16625-0589

July 5, 2019



E7312-L01-0123456 P001 T00001 *****OEL
SAMPLE A SAMPLE
APT 123
123 ANY ST
ANYTOWN, US 12345-6789



Re: Notice of Data Breach

Dear Sample A Sample:

The American Kennel Club (“AKC”) recently discovered a situation that may affect the security of your personal information. We write to provide you with information about the incident, steps we are taking in response, and steps you can take to better protect against the possibility of identity theft and fraud, should you feel it is appropriate to do so.

What Happened? On May 13, 2019, AKC became aware of a technical issue that allowed AKC employees and certain outside contractors unintended access to an internal Human Resources/Finance project management folder containing sensitive information relating to current and former AKC staff and, in some cases, their dependents/family members. We took immediate steps to repair the issue so that only intended authorized personnel can now access this information. We launched a thorough investigation into the incident to confirm what information, if any, may had been accessible.

We determined this technical issue existed between November 2018 and May 13, 2019, when we corrected the issue. Other than the single, isolated situation that led to our discovery of the issue, AKC is not aware of any other time when an employee or outside contractor accessed the folder in question. We have no indication that this incident presents a risk of identity theft or financial harm to any individual. However, because we cannot be sure whether unauthorized access to this information occurred, we are notifying potentially impacted individuals in an abundance of caution.

What Information Was Involved? After a lengthy and thorough internal review process, AKC recently confirmed that your information was impacted by this issue. The following types of your information were stored within the folder that could have been accessed by an AKC employee or outside contractor: your name and Social Security Number.

What Are We Doing? AKC takes this incident and the security of personal information within our care very seriously. We immediately identified and mitigated the issue by limiting access to the folder to only those individuals with a legitimate need to view it.

As an added precaution, and despite the fact that there is no indication this incident presents a risk of identity theft or financial harm, we are providing you with information you can use to better protect against identity theft and fraud, as well as access to 24 months of complimentary credit monitoring and identity restoration services through Experian. Instructions for enrolling in the credit monitoring services, as well additional information on how to better protect against identity theft or fraud, are included in the attached *Privacy Safeguards*.

What Can You Do? You can review the *Privacy Safeguards* for additional information on how to better protect against identity theft and fraud. You can also enroll to receive the complimentary credit monitoring and identity restoration services described above.

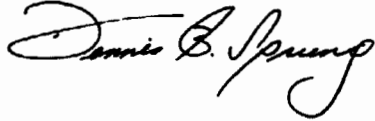
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For More Information. We understand that you may have questions that are not addressed in this notice. If you have additional questions or concerns, please call our toll-free dedicated assistance line at 877-218-0049. This toll-free line is available Monday to Friday from 9:00 am to 7:00 pm EST, excluding major national holidays. We apologize for any inconvenience or concern this incident causes you.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis B. Sprung". The signature is written in a cursive style with a large, looping initial "D".

The American Kennel Club

Enclosure

PRIVACY SAFEGUARDS

Enroll in Credit Monitoring.

To help protect your identity, we are offering a complimentary 24 months 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:** October 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 October 31, 2019. Be prepared to provide engagement number **DB13438** as proof of eligibility for the identity restoration services by Experian.

Additional details regarding your 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 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.

Monitor Your Accounts.

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.

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
P.O. 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
P.O. 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

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 promptly reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

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

For North Carolina residents, North Carolina residents may wish to review information provided by the North Carolina Attorney General, Consumer Protection Division at www.ncdoj.gov, by calling 877-566-7226, or writing to 9001 Mail Services Center, Raleigh, NC 27699.

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-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.