



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

JUL 26 2021

CONSUMER PROTECTION

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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

July 20, 2021

VIA U.S. MAIL

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

Re: Notice of Security Incident

Dear Sir or Madam:

We represent Androscoggin Valley Regional Refuse Disposal District (“AVRRDD”) located at 3 Twelfth St., Berlin, NH 03570, and are writing to notify your office of an incident that may affect the security of some personal information relating to 51 New Hampshire residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, AVRRDD 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 May 3, 2021, AVRRDD became aware of suspicious activity on its computer network. We immediately launched an investigation with the assistance of industry leading cybersecurity specialists and determined that our network had been infected with malware that impacted our computer system operations and caused a temporary disruption to our services. We then began a lengthy and labor-intensive process to restore our operations and determine whether any sensitive information may have been impacted. On or about June 7, 2021, we determined that information related to certain individuals was potentially impacted.

Notice to New Hampshire Residents

AVRRDD maintains personal information stored within its systems relating to two (2) third party entities. The third-party entities are USDA and CIANBRO. On July 19, 2021, AVRRDD began providing written notice of this incident to affected individuals, which includes 35 New Hampshire residents. Additionally, on July 19, 2021, AVRRDD began providing written notice, on behalf of USDA, of this incident to affected individuals, which includes 1 New Hampshire resident. On July 20, 2021, CIANBRO began providing written notice of this incident to affected individuals, which includes 15 New Hampshire residents. In total, notice is being provided to a total of 51 New Hampshire residents

AVRRDD is providing notice to your office on our behalf, and on behalf of USDA and CIANBRO. 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

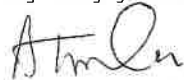
Upon discovering the event, AVRRDD moved quickly to investigate and respond to the incident, assess the security of AVRRDD systems, and notify potentially affected individuals. AVRRDD is also working to implement additional safeguards and training to its employees. AVRRDD is providing access to credit monitoring services for 1 year, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, AVRRDD 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. AVRRDD 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.

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/eks

EXHIBIT A



Androscoggin Valley

Regional Refuse Disposal District

To Enroll, Please Call:
1-800-939-4170
Or Visit:
<https://app.idx.us/account-creation/protect>
Enrollment Code: [XXXXXXXXXX]

<<Return Mail Address>>

<<Name 1>> <<Name 2>>
<<Address 1>>
<<Address 2>>
<<City>>, <<State>> <<Zip>>
<<Country>>

<<Date>>

Dear <<Name 1>> <<Name 2>>:

Androscoggin Valley Regional Refuse Disposal District (“AVRRDD”) is writing to inform you of a recent event that may impact the privacy of some of your information. While we are unaware of any attempted or actual misuse of your information at this time, we are providing you with information about the event, our response, and steps you may take to protect against any misuse of your information, should you feel it is necessary to do so.

What Happened? On May 3, 2021, AVRRDD became aware of suspicious activity on its computer network. We immediately launched an investigation with the assistance of industry leading cybersecurity specialists and determined that our network had been infected with malware that impacted our computer system operations and caused a temporary disruption to our services. We then began a lengthy and labor-intensive process to restore our operations and determine whether any sensitive information may have been impacted. On or about June 7, 2021, we determined that information related to you was potentially impacted.

What Information Was Involved? The following types of your information may have been impacted by this incident: your Social Security number, driver’s license number, and name. At this time, we have no indication of misuse of any personal information in relation to this incident.

What We Are Doing. AVRRDD takes this incident and the security of your information seriously. Upon discovery, we immediately launched an investigation and took steps to secure our systems. As part of our ongoing commitment to the privacy of personal information in our care, we are reviewing our policies, procedures, and processes related to storage of and access to personal information. We also notified applicable regulatory authorities, as required by law.

As an added precaution, we are also offering 12 months of complimentary access to credit monitoring, fraud consultation, and identity theft restoration services through IDX. Individuals who wish to receive

these services must enroll by following the attached enrollment instructions. Please note the deadline to enroll is March 1, 2022.

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. You can review the enclosed *Steps You Can Take to Help Protect Your Information* to learn helpful tips on steps you can take to protect against possible information misuse should you feel it appropriate to do so.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please contact us at (603)752-3342, 9:00 a.m. to 4:00 p.m. ET, Monday through Friday. You can also write to us at P.O. Box 336, Berlin, NH 03570.

AVRRDD sincerely regrets any inconvenience or concern this incident has caused.

Sincerely,

Sharon Gauthier
Executive Director
Androscoggin Valley Regional Refuse Disposal District

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring and Identity Protection Services

1. Website and Enrollment. Go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Please note the deadline to enroll is March 1, 2022.

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.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

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 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-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.