

April 11, 2024

#### **VIA EMAIL**

Attorney General John Formella Consumer Protection Bureau Office of the Attorney General 33 Capitol St. Concord, NH 03301 attorneygeneral@doj.nh.gov

# Re: Notification of Data Security Incident

Dear Attorney General Formella:

Constangy Brooks Smith & Prophete LLP represents APSCO, LLC ("APSCO") located in Tulsa, Oklahoma, with respect to a recent data security incident described in greater detail below. The purpose of this letter is to notify you of the incident.

#### 1. Nature of the Security Incident

On November 23, 2023, APSCO discovered unusual activity within its network. In response, it took immediate steps to secure its environment and promptly launched an investigation. It also engaged independent cybersecurity experts to conduct an investigation. As a result of this investigation, APSCO learned that an unauthorized actor may have accessed certain data stored in its systems. After a thorough review of the accessed data, on April 4, 2024, APSCO determined that certain personal information may have been impacted by this incident.

The affected information varies by individual, but may have included individuals'

### 2. Number of New Hampshire Residents Affected

On April 11, 2024, APSCO notified four (4) New Hampshire residents of this incident via first class U.S. mail. A sample copy of the notification letter sent to impacted individuals is included with this correspondence.

#### 3. Steps Taken Relating to the Incident

To help prevent something like this from happening again, APSCO is implementing additional security measures. It is also offering complimentary credit and identity protection monitoring to all notified individuals.

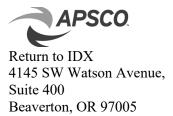
# 4. Contact Information

APSCO remains dedicated to protecting the information in its possession. If you have any questions or need additional information, please do not hesitate to contact me at by phone

Regards,

Maria Efaplomatidis Partner

Enc.: Sample Consumer Notification Letter



```
<<First Name>> <<Last Name>>
<<Address 1>>
<<Address 2>>
<<City>><<State>>><Zip>>
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April 11, 2024

**Subject: Notice of Data << Breach/Security Incident>>** 

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

We are writing to inform you of a recent data security incident experienced by APSCO, LLC, located in Tulsa, Oklahoma, that may have involved some of your information. This letter is to notify you of the incident, offer you complimentary identity protection services, and inform you about steps you can take to help protect your personal information.

What Happened: On November 23, 2023, APSCO discovered unusual activity within its network. In response, we took immediate steps to secure our environment and promptly launched an investigation. We also engaged independent cybersecurity experts to conduct an investigation. As a result of this investigation, we learned that an unauthorized actor may have accessed certain data stored in our systems. After a thorough review of the accessed data, on April 4, 2024, ASPCO determined that your personal information may have been impacted by this incident.

There is no evidence that your personal information has been misused. However, out of an abundance of caution, we are notifying you about the incident, providing you with resources to help you protect your personal information, and offering you complimentary identity protection services.

What Information Was Involved: The data that could have potentially been accessed by the unauthorized party included your

What We Are Doing: To help prevent something like this from happening again, we are implementing additional technical security measures. We are also providing you with information about steps that you can take to help protect your personal information. As a further precaution, we are offering you <<12/24>> months of complimentary identity protection services through IDX. This product helps detect possible misuse of your information and provides you with identity protection support.

What You Can Do: You can follow the recommendations included with this letter to help protect your information. In addition, you can also enroll in IDX's complimentary identity protection services by going to the link noted above or calling the number noted below. When prompted, please provide the unique code noted above to enroll in the services. The deadline to enroll is

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For more information on how you can protect your personal information, please review the resources provided on the following pages.

**For More Information:** If you have any questions regarding the incident, please call 1-800-939-4170, Monday through Friday, between 8:00am – 8:00pm CST.

The security of the information in our possession is a top priority for APSCO. We take your trust in us and this matter very seriously and we deeply regret any worry or inconvenience that this may cause you.

Sincerely,

Deirdre Dinelli, CFO APSCO, LLC 4221 S 68<sup>th</sup> E. Avenue, Suite A Tulsa, OK 74145

#### **Steps You Can Take to Protect Your Personal Information**

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

**Copy of Credit Report:** You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <a href="http://www.annualcreditreport.com/">http://www.annualcreditreport.com/</a>, calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You also can contact one of the following three national credit reporting agencies:

Equifax	Experian	TransUnion
P.O. Box 105851	P.O. Box 9532	P.O. Box 1000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19016
1-800-525-6285	1-888-397-3742	1-800-916-8800
www.equifax.com	www.experian.com	www.transunion.com

**Fraud Alert:** You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <a href="http://www.annualcreditreport.com">http://www.annualcreditreport.com</a>.

Security Freeze: You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

**Additional Free Resources:** You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

Federal Trade Commission 600 Pennsylvania Ave, NW Washington, DC 20580 consumer.ftc.gov, and www.ftc.gov/idtheft 1-877-438-4338

North Carolina Attorney General 9001 Mail Service Center Raleigh, NC 27699 ncdoj.gov 1-877-566-7226 New York Attorney General
Bureau of Internet and Technology
Resources
28 Liberty Street
New York, NY 10005
1-212-416-8433

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit <a href="https://www.consumer.ftc.gov/sites/default/files/articles/pdf/pdf-0096-fair-credit-reporting-act.pdf">https://www.consumer.ftc.gov/sites/default/files/articles/pdf/pdf-0096-fair-credit-reporting-act.pdf</a>.