

RECEIVED

MAY 15 2023

CONSUMER PROTECTION



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

19109 West Catawba Avenue, Suite 200
Cornelius, NC 28031

May 10, 2023

VIA U.S. MAIL

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

Re: Notice of Data Event

To Whom It May Concern:

We represent ARC Document Solutions, Inc. ("ARC"), located at 12657 Alcosta Blvd., Suite 200, San Ramon, CA 94583, and are writing to notify your office of an incident that may affect the security of certain personal information relating to approximately four (4) 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, ARC 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 January 15, 2023, ARC became aware of suspicious activity on its servers. ARC immediately took steps to secure its network, and with the assistance of industry-leading third-party forensic specialists, deployed countermeasures to contain the incident. ARC further began an investigation to determine the nature and scope of the activity. The investigation confirmed that an unauthorized actor gained access to certain files within the ARC systems between January 12, 2023 and January 18, 2023.

Given that certain information was accessed without authorization, ARC then undertook a comprehensive review of the impacted data to understand the specific information potentially impacted and to whom it related for purposes of providing notification to potentially impacted individuals. These efforts were completed on March 29, 2023, and ARC thereafter worked to provide notification to potentially impacted individuals as quickly as possible.

The information that could have been subject to unauthorized access includes

Notice to New Hampshire Residents

On May 10, 2023, ARC provided written notice of this incident to approximately 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, ARC moved quickly to investigate and respond to the incident, assess the security of ARC systems, and identify potentially affected individuals. Further, ARC notified federal law enforcement regarding the event. ARC is also working to implement additional safeguards and training to its employees. ARC is providing access to credit monitoring 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, ARC is providing impacted individuals with guidance on how to better protect against identity theft and fraud. ARC 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.

ARC is providing written notice of this incident to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at

Very truly yours,

Matthew V. Toldero of
MULLEN COUGHLIN LLC

MVT/rmm
Enclosure

EXHIBIT A



Document Solutions*

Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

May 10, 2023

J4243-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 INDIVIDUAL CM
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



Re: Notice of Data [Extra1]

Dear Sample A. Sample:

ARC Document Solutions, Inc. ("ARC") is writing to notify you of a recent incident that may affect the privacy of some of your personal information. We write to provide you with information about the incident, our response, and steps you can take to help protect against the possible misuse of your information, should you feel it is appropriate to do so.

What Happened? On January 15, 2023, ARC became aware of suspicious activity on its servers. We immediately took steps to secure our network, and with the assistance of industry-leading third-party forensic specialists, deployed countermeasures to contain the incident. We further began an investigation to determine the nature and scope of the activity. Our investigation confirmed that an unauthorized actor gained access to certain files within our systems between January 12, 2023 and January 18, 2023.

Given that certain information was accessed without authorization, we then undertook a comprehensive review of the impacted data to understand the specific information potentially impacted and to whom it related for purposes of providing notification to potentially impacted individuals. We completed those efforts on March 29, 2023, and thereafter worked to provide notification to potentially impacted individuals as quickly as possible. We are notifying you because your information was present in the files accessible to the unauthorized actor, and therefore may have been accessed during this incident.

What Information Was Involved? Our investigation determined that the information related to you that may have been impacted includes [REDACTED]. Please note that we have no evidence that any of your information was used for identity theft or fraud.

What We Are Doing. We take this incident and the obligation to safeguard the information in our care very seriously. After discovering the suspicious activity, we promptly took steps to confirm our system security, and engaged third-party forensic specialists to assist in conducting a comprehensive investigation of the incident to confirm its nature, scope, and impact. ARC also promptly notified federal law enforcement. Further, as part of our ongoing commitment to the privacy and security of personal information in our care, we are reviewing and enhancing existing policies and procedures relating to data protection and security. We have instituted additional security measures to better protect against future similar incidents. We are also notifying relevant regulatory authorities, as required.

We are notifying you out of an abundance of caution and providing information and resources to assist you in helping protect your personal information, should you feel it appropriate to do so. As an added precaution, we are offering you access to credit monitoring and identity theft protection services for [Extra3] months through Experian at no cost to you. If you wish to activate these complimentary services, you may follow the instructions included in the attached *Steps You Can Take to Help Protect Personal Information*. We encourage you to enroll in these services as we are unable to act on your behalf to do so.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing account statements and monitoring your free credit reports for suspicious activity and to detect errors. You should report any such activity to law enforcement. You can also enroll to receive the complimentary credit monitoring services that we are offering to you. Please also review the information contained in the enclosed *Steps You Can Take to Help Protect Personal Information*.

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 dedicated call center at _____, which is available from 8:00 a.m. to 10:00 p.m. Central Time Monday through Friday, and Saturday and Sunday 10:00 a.m. to 7:00 p.m. Central Time (excluding major U.S. holidays). Be prepared to provide your engagement number _____. You may also write to ARC at 12657 Alcosta Boulevard, Suite 200, San Ramon, CA 94583.

We sincerely regret any inconvenience or concern this incident may cause.

Sincerely,

Jorge Avalos
Chief Financial Officer

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for [Extra3] months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. 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 from the date of the incident (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 is available to you for [Extra3] 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.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary [Extra3]-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your **activation code**:

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at . Be prepared to provide engagement number as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR [Extra3]-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.¹
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists 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.
- **\$1 Million Identity Theft Insurance²:** Provides coverage for certain costs and unauthorized electronic fund transfers.

¹ Offline members will be eligible to call for additional reports quarterly after enrolling.

² 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.

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	1-800-916-8800
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.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and oag@dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

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 bureaus 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.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 9 Rhode Island residents impacted by this incident.