



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

SEP 19 2022

CONSUMER PROTECTION

James Paulino
Office: (267) 930-4741
Fax: (267) 930-4771
Email: jpaulino@mullen.law

75 S. Clinton Avenue, Suite 510
Rochester, NY 14604

September 14, 2022

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 Area Five Agency on Aging & Community Services (“Area Five Agency”) located at 1801 Smith Street, Logansport, Indiana 46947, and write to notify your office of an incident that may affect the security of certain personal information relating to one (1) New Hampshire resident. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Area Five Agency 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 or about February 2, 2022, Area Five Agency identified anomalous activity in its network. Following this, Area Five Agency secured the environment and launched an investigation to determine the nature and scope of this incident. Through this investigation, Area Five Agency determined that an unauthorized individual was able to access certain systems and data within its network containing protected information; however, Area Five Agency was unable to determine exactly what files may have been accessed. Area Five Agency then performed a comprehensive review of the potentially impacted files contained within relevant systems and, on August 4, 2022, confirmed that files contained information related specific individuals. Since then Area Five Agency worked diligently to reconcile the information and to leverage third-party resources in furtherance of identifying appropriate contact information so that notification to potentially impacted individuals could begin. This review was completed September 2, 2022.

Mullen.law

The information that could have been subject to unauthorized access includes name and Social Security number.

Notice to New Hampshire Resident

On or about September 14, 2022, Area Five Agency provided written notice of this incident to one (1) New Hampshire resident. 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, Area Five Agency moved to investigate and respond to the incident, assess the security of Area Five Agency systems, and identify potentially affected individuals. Further, Area Five Agency notified federal law enforcement regarding the event and will participate in any criminal investigation into this matter. Area Five Agency is also working to implement additional safeguards and training to its employees. Area Five Agency is providing access to credit monitoring and identity theft restoration services for one (1) year, through TransUnion, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Area Five Agency is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Area Five Agency is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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.

Area Five Agency is providing written notice of this incident to pertinent regulators, as necessary.

Contact Information

Should you have any questions regarding this notification or other issues, please contact us at (267) 930-4741.

Verv truly yours,

James Paulino of
MULLEN COUGHLIN LLC

JMP/ajl
Enclosure

EXHIBIT A

Area Five Agency on Aging & Community Services
Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>

<<Name 1>>

<<Name 2>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<Address 4>>

<<Address 5>>

<<City>><<State>><<Zip>>

<<Country>>

<<Date>>

<<Variable Header>>

Dear <<Name 1>>:

Area Five Agency on Aging & Community Services (“Area Five Agency”) writes to inform you of an event that could affect the privacy of some of your information. This notice provides information about the incident, our response, and resources available to you to help protect your information, including a complimentary offer of credit monitoring services, with \$1,000,000 in identity theft insurance, at no cost to you; enrollment instructions are on the following pages.

What Happened? On or about February 2, 2022, Area Five Agency identified anomalous activity in its network. Following this, we secured the environment and launched an investigation to determine the nature and scope of this incident. Through this investigation, we determined that an unauthorized individual was able to access certain systems and data within our network containing protected information; however, we were unable to determine exactly what files may have been accessed. We then performed a comprehensive review of the potentially impacted files contained within relevant systems and, on August 4, 2022, confirmed that files contained information related to you. Since then we worked diligently to reconcile the information with our internal records and leverage third-party resources in furtherance of identifying appropriate contact information so that notification to potentially impacted individuals could begin. This review was completed September 2, 2022.

What Information Was Involved? We determined the following types of information relating to you were present in the systems at the time of the unauthorized access, noting that we do not know whether your information was in fact accessed: name and Social Security number.

What We Are Doing. Data privacy and security are among our highest priorities, and upon learning of this matter we promptly commenced an investigation to confirm the nature and scope of this event. As part of Area Five Agency’s ongoing commitment to the security of information, we are also reviewing and enhancing policies and procedures, implementing additional safeguards, and conducting workforce training to reduce the likelihood of a similar event in the future. We are also providing notice of this event to potentially impacted individuals, along with the offer of complimentary access to <<CM Length>> of credit monitoring and identity theft restoration services through TransUnion, along with notice to pertinent regulators. Finally, we have notified federal law enforcement and will participate in any criminal investigation into this matter.

What You Can Do. We encourage you to remain vigilant against incident of identity theft and fraud, to review your account statements, explanation of benefits, and credit reports for suspicious activity and to detect errors. You may also review the enclosed *Steps You Can Take to Protect Personal Information* for additional steps you may take and information on what you can do to better protect against the possibility of identity theft and fraud. We also encourage you to enroll in the complimentary credit monitoring services we are offering you.

For More Information. If you have questions about this letter, please call 877-564-0645 Monday through Friday from 9 am to 9 pm Eastern Time.

Sincerely,

Area Five Agency on Aging & Community Services

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

Activation Code: <<Activation Code>>

1-Bureau TransUnion Credit Monitoring Product Offering: (Online and Offline)

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*myTrueIdentity*) for <<CM Length>> provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies.

To enroll in this service, go directly to the *myTrueIdentity* website at www.mytrueidentity.com and in the space referenced as "Enter Activation Code", enter the following unique 12-letter Activation Code <<Insert Unique 12-letter Activation Code>> and follow the three steps to receive your credit monitoring service online within minutes.

If you do not have access to the Internet and wish to enroll in a similar offline, paper based, credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the following 6-digit telephone pass code <<Engagement Number>> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

Once you are enrolled, you will be able to obtain <<CM Length>> of unlimited access to your TransUnion credit report and VantageScore® credit score by TransUnion. The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion®, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The service also includes the ability to lock and unlock your TransUnion credit report online, access to identity restoration services that provides assistance in the event your identity is compromised to help you restore your identity and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

You can sign up for the *myTrueIdentity* online Credit Monitoring service anytime between now and <<Enrollment Deadline>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have credit file at TransUnion®, or an address in the United States (or its territories) and a valid Social Security number, or are under the age of 18. Enrolling in this service will not affect your credit score.

If you have questions about your *myTrueIdentity* online credit monitoring benefits, need help with your online enrollment, or need help accessing your credit report, or passing identity verification, please contact the *myTrueIdentity* Customer Service Team toll-free at: 1-844-787-4607, Monday-Friday: 8am- 9pm, Saturday-Sunday: 8am-5pm Eastern time.

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

Internal Revenue Service Identity Protection PIN (IP PIN)

You may also obtain an Identity Protection PIN (IP PIN) from the Internal Revenue Service, a six-digit number that prevents someone else from filing a tax return using your Social Security number or Individual Taxpayer Identification Number. The IP PIN is known only to you and the IRS, and helps the IRS verify your identity when you file your electronic or paper tax return. Even though you may not have a filing requirement, an IP PIN still protects your account. If you do not already have an IP PIN, you may get an IP PIN as a proactive step to protect yourself from tax-related identity theft either online, by paper application or in-person. Information about the IP PIN program can be found here: <https://www.irs.gov/identity-theft-fraud-scams/get-an-identity-protection-pin>.

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 www.oag.state.md.us. Area Five Agency is located at 1801 Smith Street, Logansport, Indiana 46947.

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 violators. 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.risag.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 <<RI Count>> Rhode Island residents impacted by this incident.