



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

JUL 05 2022

CONSUMER PROTECTION

1452 Hughes Road, Suite 200
Grapevine, TX 76051

Amanda Harvey
Office: (267) 930-1697
Fax: (267) 930-4771
Email: aharvey@mullen.law

June 29, 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

Dear Sir or Madam:

We represent Arrowood LLP (“Arrowood”) located at 10 Post Office Square, 7th Floor South, Boston, MA 02109 and are writing to notify your office of an incident that may affect the security of certain personal information relating to two (2) New Hampshire residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Arrowood 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 March 21, 2022, Arrowood became aware of suspicious activity relating to its systems. Arrowood immediately launched an investigation into the nature and scope of the event. Arrowood recently determined that between January 13, 2022, and March 19, 2022, an unauthorized actor gained access to certain Arrowood systems and may have acquired limited information stored on Arrowood’s systems. Once that investigation was completed, Arrowood immediately started a review of the files to determine if any individuals were potentially impacted by this event. On June 7, 2022, that review was completed, and it was determined that some information relating to individuals may have been impacted.

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

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Notice to New Hampshire Residents

On or about June 29, 2022, Arrowood provided written notice of this incident to two (2) 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, Arrowood moved quickly to investigate and respond to the incident, assess the security of Arrowood systems, and identify potentially affected individuals. Further, Arrowood notified law enforcement regarding the event. Arrowood is also working to implement additional safeguards and training to its employees. Arrowood is providing access to credit monitoring services for 24 months, through Equifax, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Arrowood 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. Arrowood 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. Arrowood is providing written notice of this incident to relevant regulators, as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-1697.

Very truly yours.

Amanda Harvey of
MULLEN COUGHLIN LLC

ANH/jlm
Enclosure

EXHIBIT A

ARROWOOD^{LLP}

Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<MailID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

NOTICE OF <<Variable Header>>

Dear <<Name 1>>:

Arrowood LLP (“Arrowood”) is writing to inform you of a recent event that may involve some of your information. We are providing you notice of this incident, steps we are taking, and resources available to help you better protect your information, should you feel it necessary to do so.

What Happened?

On or about March 21, 2022, Arrowood became aware of suspicious activity relating to its systems. Arrowood immediately launched an investigation into the nature and scope of the event. We recently determined that between January 13, 2022 and March 19, 2022, an unauthorized actor gained access to certain Arrowood systems and may have acquired limited information stored on Arrowood’s systems. Once that investigation was completed, Arrowood immediately started a review of the files to determine if any individuals were potentially impacted by this event. On June 7, 2022, that review was completed, and we determined that some of your information may have been impacted.

What Information Was Involved?

The investigation determined that your name <<Breached Elements>> were affected. *At this time, there is no evidence of fraud or misuse of your information stemming from this event.*

What We Are Doing.

We take this incident and the security of personal information in our care very seriously. Upon learning of this incident, we moved quickly to investigate and respond, assess the security of our systems, and notify potentially affected individuals. As part of our ongoing commitment to information security, we notified federal law enforcement and are reviewing and enhancing existing policies and procedures to reduce the likelihood of a similar event occurring in the future.

As an added precaution, we are offering a complimentary 24-month credit monitoring to all impacted individuals through Experian. This includes credit monitoring, access to a dedicated call center, fraud consultation, and identity theft restoration services. Individuals who wish to receive these services must activate them by following the instructions found in the enclosed *Steps You Can Take to Help Further Protect Personal Information*. Please do not discard this letter or instructions as Arrowood is unable to activate these services on your behalf.

What You Can Do.

We encourage you to remain vigilant against identity theft and fraud by reviewing your account statements and monitoring your free credit report for suspicious activity and to detect errors. Please review the enclosed *Steps You Can Take to Help Further Protect Personal Information*, which contains information on what you can do to better protect against possible misuse of your information.

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 855-682-1849, Monday through Friday, 9am – 9pm, Eastern Time. You may also write to Arrowood at 10 Post Office Square, 7th Floor South, Boston, MA 02109.

Again, we take the privacy and security of personal information in our care very seriously, and sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

Arrowood LLP

STEPS YOU CAN TAKE TO HELP FURTHER PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering a complimentary 24-month membership of Experian's® IdentityWorks. 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: 9/10/2022
- Visit the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your activation code: <<Enrollment Code>>

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) 288-8057 by 9/10/2022. Be prepared to provide engagement number as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 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:

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (877) 288-8057. 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, 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 this Identity Restoration support is available to you for 24 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. You will also find self-help tips and information about identity protection at this site.

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 credit 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.

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.

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