

Dominic A. Paluzzi
Direct Dial: 248.220.1356
E-mail: dpaluzzi@mcdonaldhopkins.com

May 24, 2022

RECEIVED

MAY 31 2022

CONSUMER PROTECTION

VIA U.S. MAIL

John M. Formella
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Aspen Avionics, Inc. – Incident Notification

Dear Mr. Formella:

McDonald Hopkins PLC represents Aspen Avionics, Inc. (“Aspen”). I am writing to provide notification of an incident at Aspen that may affect the security of personal information of one (1) New Hampshire resident. Aspen’s investigation is ongoing, and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, Aspen does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

On November 7, 2021, Aspen detected a sophisticated cybersecurity attack that impacted its network. Upon learning of the issue, Aspen took steps to contain and secure the threat and commenced a prompt and thorough investigation. Aspen also immediately launched an investigation in consultation with outside cybersecurity professionals to help determine whether any sensitive data had been compromised because of the incident. Aspen’s investigation determined that the unauthorized individual(s) potentially removed certain files and folders from portions of its network between August 23, 2021 and November 5, 2021. On April 13, 2022, following an extensive review and analysis of the data at issue, Aspen determined that certain files and folders potentially removed from its network contained the New Hampshire resident’s full name, Social Security number, bank account information, driver’s license number, and passport number.

Aspen is not aware of any reports of identity theft or fraud arising out of this incident. Nevertheless, out of an abundance of caution, Aspen wanted to inform you (and the affected resident) of the incident and to explain the steps that it is taking to help safeguard the affected resident against identity fraud. Aspen is providing the affected resident with written notification of this incident commencing on or about May 24, 2022 in substantially the same form as the letter attached hereto. Aspen is offering the affected resident complimentary one-year membership with a credit monitoring service. Aspen will advise the affected resident to always remain vigilant in reviewing financial account statements for fraudulent or irregular activity on a regular basis. Aspen will advise the affected resident about the process for placing a fraud alert and/or security freeze on their credit files and obtaining free credit reports. The affected resident is also being provided with the contact information for the consumer reporting agencies and the Federal Trade Commission.

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At Aspen, protecting the privacy of personal information is a top priority. Aspen is committed to maintaining the privacy of personal information in its possession and has taken many precautions to safeguard it. Aspen continually evaluates and modifies its practices to enhance the security and privacy of the personal information it maintains.

Should you have any questions regarding this notification, please contact me at (248) 220-1356 or dpaluzzi@mcdonaldhopkins.com. Thank you for your cooperation.

Sincerely,

Dominic A. Paluzzi

Encl.



[REDACTED]

[REDACTED]

Dear [REDACTED]

We are writing with important information regarding a recent data security incident at Aspen Avionics, Inc. (“Aspen”). The privacy and security of the personal information we maintain is of the utmost importance to us. We wanted to provide you with information about the incident, explain the services we are making available to you, and let you know that we continue to take significant measures to protect your information.

What Happened?

On November 7, 2021, Aspen detected a sophisticated cybersecurity attack that impacted our network. Upon learning of the issue, we took steps to contain the threat and ensure the security of all of our data.

What We Are Doing.

In addition to taking the remediation and restoration steps above, we commenced an immediate and thorough investigation. As part of our investigation, we engaged external cybersecurity professionals experienced in handling these types of incidents. We also reported the incident to the Federal Bureau of Investigation (FBI) and are cooperating in the law enforcement investigation relating to this incident.

Our investigation determined that the unauthorized individual(s) removed certain files and folders from portions of our network between August 23, 2021 and November 5, 2021. We then worked to identify what personal information, if any, might have been present in those files. After a complex analysis of those files, we discovered on April 13, 2022 that the impacted files contained some of your personal information. We have no indication or evidence that any of that data has been or will be misused.

What Information Was Involved?

The impacted files contained some of your personal information, specifically your full name, Social Security number, bank account information, driver’s license number, and passport number.

What You Can Do.

We have no evidence that any of your information has or will be misused. Nevertheless, we are offering a complimentary one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.

This letter also provides other precautionary measures you can take to protect your personal information, including placing a Fraud Alert and/or Security Freeze on your credit files, and/or obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis.

For More Information.

Please accept our sincere apologies that this incident occurred. We are committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices and internal controls to enhance the security and privacy of your personal information.

If you have any further questions regarding this incident, please contact 

Sincerely,

Aspen Avionics, Inc.

- OTHER IMPORTANT INFORMATION -

1. Enrolling in Complimentary 12-Month Credit Monitoring.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: [REDACTED] (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: <https://www.experianidworks.com/3bcredit>
3. PROVIDE the **Activation Code**: [REDACTED]

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. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

**ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN
IDENTITYWORKS CREDIT 3B MEMBERSHIP:**

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

**Activate your membership today at <https://www.experianidworks.com/3bcredit>
or call 877-288-8057 to register with the activation code above.**

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8057.

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

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

2. Placing a Fraud Alert on Your Credit File.

Whether or not you choose to use the complimentary 12 month credit monitoring services, we recommend that you place an initial one (1) year "fraud alert" on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

Equifax

1-800-525-6285

<https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>

P.O. Box 105788

Atlanta, GA 30348

Experian

1-888-397-3742

<https://www.experian.com/fraud/center.html>

P.O. Box 9554

Allen, TX 75013

TransUnion LLC

1-800-680-7289

<https://www.transunion.com/fraud-alerts>

P.O. Box 6790

Fullerton, CA 92834-6790

3. Placing a Security Freeze on Your Credit File.

If you are very concerned about becoming a victim of fraud or identity theft, you may request a "security freeze" be placed on your credit file, at no charge. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place

a security freeze on your credit report by contacting all three nationwide credit reporting companies at the numbers below and following the stated directions or by sending a request in writing, by mail, to all three credit reporting companies:

Equifax Security Freeze

P.O. Box 105788

Atlanta, GA 30348

<https://www.equifax.com/personal/credit-report-services/credit-freeze/>

1-800-349-9960

Experian Security Freeze

P.O. Box 9554

Allen, TX 75013

<http://experian.com/freeze>

1-888-397-3742

TransUnion Security Freeze

P.O. Box 2000

Chester, PA 19016

<http://www.transunion.com/credit-freeze>

1-888-909-8872

In order to place the security freeze, you'll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

If you do place a security freeze *prior* to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

4. Obtaining a Free Credit Report.

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at **www.annualcreditreport.com**. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

5. Additional Helpful Resources.

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at www.ftc.gov/idtheft, by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.

Oregon Residents: You may obtain information about preventing identity theft from the Oregon Attorney General's Office: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392

New Mexico Residents: You have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf or www.ftc.gov.

*In Addition, New Mexico Consumers Have the Right to
Obtain a Security Freeze or Submit a Declaration of Removal*

As noted above, you may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, you will be provided with a personal identification number, password, or similar device to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report to a specific party or parties or for a specific period of time after the freeze is in place. To remove the freeze or to provide authorization for the temporary release of your credit report, you must contact the consumer reporting agency and provide all of the following:

1. The unique personal identification number, password, or similar device provided by the consumer reporting agency;
2. Proper identification to verify your identity; and
3. Information regarding the third party or parties who are to receive the credit report or the period of time for which the credit report may be released to users of the credit report.

A consumer reporting agency that receives a request from a consumer to lift temporarily a freeze on a credit report shall comply with the request no later than three business days after receiving the request. As of September 1, 2008, a consumer reporting agency shall comply with the request within fifteen minutes of receiving the request by a secure electronic method or by telephone.

A security freeze does not apply in all circumstances, such as where you have an existing account relationship and a copy of your credit report is requested by your existing creditor or its agents for certain types of account review, collection, fraud control, or similar activities; for use in setting or adjusting an insurance rate or claim or insurance underwriting; for certain governmental purposes; and for purposes of prescreening as defined in the federal Fair Credit Reporting Act.

If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze, either completely if you are shopping around or specifically if for a certain creditor, with enough advance notice before you apply for new credit for the lifting to take effect. You should contact a consumer reporting agency and request it to lift the freeze at least three business days before applying. As of September 1, 2008, if you contact a consumer reporting agency by a secure electronic method or by telephone, the consumer reporting agency should lift the freeze within fifteen minutes. You have a right to bring a civil action against a consumer reporting agency that violates your rights under the Fair Credit Reporting and Identity Security Act.

To place a security freeze on your credit report, you must send a request to each of the three major consumer reporting agencies: Equifax, Experian, and TransUnion. You may contact these agencies using the contact information provided above.