



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

AUG 08 2022

CONSUMER PROTECTION

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3 Allied Drive, Suite 303
Dedham, MA 02026

August 5, 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 Atlas MedStaff LLC (“Atlas”) located at 11159 Mill Valley Road, Omaha, NE 68154, and are writing to notify your office of an incident that may affect the security of certain personal information relating to approximately twenty-seven (27) New Hampshire residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Atlas 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

Atlas recently concluded its investigation into an October 2021 data security incident involving a malware infection that impacted its computer systems and caused a temporary disruption to services. Upon learning of the incident, Atlas promptly worked to secure our systems and with the assistance of third-party forensic specialists and commenced an investigation to confirm the nature and scope of the incident. The investigation determined that Atlas was the victim of a sophisticated cyberattack and that an unauthorized actor may have accessed and/or acquired a limited amount of data stored on our systems between October 15, 2021 and October 21, 2021. Through a third-party data analytics vendor, Atlas conducted a comprehensive and time-consuming review of the potentially affected data to determine whether it contained any sensitive information and to whom the information relates. The comprehensive review was recently concluded on or about July 13, 2022.

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The information that could have been subject to unauthorized access varies by individual and may include name, Social Security number, driver's license number.

Notice to New Hampshire Residents

On or about August 5, 2022, Atlas provided written notice of this incident to approximately twenty-seven (27) 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 incident, Atlas moved quickly to investigate and respond to the incident, assess the security of Atlas systems, and identify potentially affected individuals. Further, Atlas notified federal law enforcement regarding the incident. Atlas 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, Atlas 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. Atlas is providing individuals with information on how to place a fraud alert and a credit freeze on their 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security incident, please contact us at (267) 930-2303.

Very truly yours,

Lynda Jensen of
MULLEN COUGHLIN LLC

LRJ/dle

EXHIBIT A



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

August 5, 2022

i1775-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



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



Re: [Extra2 - Variable Header]

Dear Sample A. Sample:

Atlas MedStaff LLC (“Atlas”) writes to inform you of an incident that may affect the privacy of some of your information. Although Atlas is unaware of any actual or attempted misuse of your information, Atlas is providing you notice of the incident, steps Atlas is taking in response, and resources available to help you better protect your information, should you feel it is appropriate to do so.

What Happened? On or about October 21, 2021, Atlas experienced a data security incident that impacted its computer systems and caused a temporary disruption to services. We promptly worked to secure our systems and, with the assistance of third-party forensic specialists, commenced an investigation to confirm the nature and scope of the incident. The investigation determined that Atlas was the victim of a sophisticated cyberattack and that between October 15, 2021 and October 21, 2021, an unauthorized actor may have accessed and/or acquired a limited amount of data stored on our systems. A comprehensive and time-consuming review of the affected data was subsequently performed to determine whether it contained any sensitive information and to identify potentially affected individuals. On July 13, 2022, we concluded this review and determined that your information was in the files that may have been accessed or acquired without authorization.

What Information Was Involved? As indicated above, Atlas is unaware of any actual or attempted misuse of your personal information. However, we are providing you with this notification out of an abundance of caution. Although the affected information varies by individual, the types of information present in the files that were potentially impacted by this incident included: [Extra3 - data elements], and name.

What We Are Doing. Atlas treats its responsibility to safeguard information as an utmost priority. As such, we responded promptly to this incident and worked diligently to provide you with an accurate and complete notice of the incident as soon as possible. As part of our ongoing commitment to the privacy and security of personal information in our care, we have reviewed and updated existing policies and procedures relating to data protection and security. We also have implemented additional security measures to mitigate any risk associated with this incident and to better prevent future similar incidents. Atlas is providing notice of this incident to potentially impacted individuals and to regulators, where required.

Out of an abundance of caution, Atlas is providing you with ## months of complimentary access to credit monitoring and identity restoration services through Experian, as well as guidance on how to better protect your information, should you feel it is appropriate to do so. Although we are covering the cost of these services, due to privacy restrictions, you will need to complete the activation process yourself.



What You Can Do. Although there is no evidence of any actual or attempted misuse of your information, Atlas encourages you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements, explanation of benefits, and monitoring your free credit reports for suspicious activity and to detect errors over the next 12 to 24 months. Any suspicious activity should be reported to the appropriate insurance company, health care provider, or financial institution. You can also find out more about how to safeguard your information in the enclosed *Steps You Can Take to Protect Personal Information*. There, you will find additional information about the complimentary credit monitoring services and how to enroll.

For More Information. We understand you may have questions about this incident that are not addressed in this letter. To ensure your questions are answered in a timely manner, please call our dedicated assistance line at: (833) 327-5932, Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays). You may also write to us directly at 11159 Mill Valley Road, Omaha, NE 68154.

Sincerely,

Atlas MedStaff LLC

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Complimentary Credit Monitoring Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for ## 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 ## 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 ## 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** November 30th, 2022 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- 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 (833) 327-5932 by November 30th, 2022 from Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays). Be prepared to provide engagement number **ENGAGE#** as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR ## 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.*
- **Credit Monitoring:** Actively monitors Experian file 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 Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

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

** 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.

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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 one-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 fraud alert or 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
1-888-298-0045	1-888-397-3742	1-833-395-6938
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 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-fera.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; 1-401-274-4400; and www.riag.ri.gov. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are approximately eleven (11) Rhode Island residents impacted by this incident.

