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

May 7, 2020

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent Atria Wealth Solutions ("Atria"), located at 295 Madison Avenue, Suite 1407, New York, New York, 10017, and its affiliated subsidiaries Cuso Financial Services, Sorrento Pacific Financial, and Cadaret Grant & Co., Inc. We are writing to notify your office of a data security incident that occurred at Atria and may affect the security of some personal information relating to seven (7) 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, Atria 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**

Atria became aware of suspicious emails coming from an employee's email account. An investigation was launched immediately with assistance from third-party computer forensics specialists to determine the nature and scope of the activity. On March 26, 2020, the investigation determined that certain personal information was accessible within the email account when it was accessed without authorization on December 3, 2019. The investigation, however, was unable to determine what, if any, information was viewed by the unauthorized actor(s). Since determining that personal information was accessible within the account, Atria undertook efforts to locate address information for potentially impacted individuals and determine its relationship to these individuals in order to provide them with notice of this event.

Atria cannot confirm specifically whether any personal information was viewed by the unauthorized actor(s). However, the investigation confirmed that the information present in the impacted account at the time of unauthorized access included the following: name, Social Security

number, driver's license number, passport number, credit/debit card number, credit/debit card CVV, and password or PIN.

**Notice to New Hampshire Residents**

On or about May 7, 2020, Atria began providing written notice of this incident to individuals with personal information accessible within the email account, which includes seven (7) 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**

Information privacy and security are among Atria's highest priorities. Atria routinely monitors and enhances the security of its systems. In addition, upon learning of this incident, Atria immediately took steps to implement further security enhancements. Atria also launched an in-depth investigation as indicated above. As part of its ongoing commitment to the privacy and security of personal information, Atria has reviewed its existing policies and procedures to mitigate any risk associated with this incident and to better prevent future incidents. Atria is also providing potentially impacted individuals complimentary access to credit monitoring and identity restoration services for twelve (12) months through Experian.

Additionally, Atria is providing potentially impacted individuals guidance on how to better protect against the potential misuse of personal information and advising individuals to report any suspected incidents of identity theft or fraud to their associated credit card company and/or bank. Atria is also 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.

**Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event described herein, please contact us at (267) 930-4786.

Very truly yours,

Ryan C. Loughlin of
MULLEN COUGHLIN LLC

RCL:mcm

# Exhibit A

CUSO FINANCIAL Member FINRA/SIPC
An Atria Company

<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country >>

**<<b2b_text_3 (Headline)>>**

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

CUSO Financial Services, L.P. ("CUSO Financial") is writing to notify you of a recent phishing incident. We are providing you with information about the event, measures we have taken in response, and resources available to help you protect your personal information as a precautionary measure, should you feel it appropriate to do so.

**What Happened?** CUSO Financial became aware of suspicious emails coming from an affiliate's employee's email account. An investigation was launched immediately with assistance from third-party computer forensics specialists to determine the nature and scope of the activity. On March 26, 2020, the investigation determined that certain personal information was accessible within the email account when it was accessed without authorization on December 3, 2019. The investigation, however, was unable to determine what, if any, information was viewed by the unauthorized actor(s). Approximately 1% of clients were potentially affected at CUSO Financial. Since determining that personal information was accessible within the account, CUSO Financial undertook efforts to locate address information for potentially impacted individuals and determine its relationship to these individuals in order to provide this notice.

**What Information Was Involved?** CUSO Financial cannot confirm specifically whether any personal information was viewed by the unauthorized actor(s). However, the investigation confirmed that the information present in the impacted email account at the time of unauthorized access included your <<b2b_text_4 (Data Elements)>>.

**What We Are Doing.** Information privacy and security are among our highest priorities. We routinely monitor and enhance the security of our systems. In addition, upon learning of this incident, we immediately took steps to implement further security enhancements. We also launched an in-depth investigation as indicated above. As part of our ongoing commitment to the privacy and security of personal information, we have reviewed our existing policies and procedures to mitigate any risk associated with this incident and to better prevent future incidents.

We are also providing you with twelve (12) months of complimentary access to credit monitoring and identity restoration services through Experian, as well as guidance on how to further protect your information against the possibility of misuse. While CUSO Financial is covering the cost of these services, you will need to complete the activation process yourself.

**What You Can Do.** You can find out more about how to further protect your personal information against potential misuse in the enclosed Precautionary *Steps You Can Take to Help Protect Personal Information.* There, you will find more details about the credit monitoring services we are offering 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, we established a dedicated assistance line at 844-973-2464 which can be reached Monday through Friday from 9 a.m. to 6:30 p.m. ET, excluding U.S. holidays. You may also write to us directly at:

CUSO Financial Services, L.P.
10150 Meanley Dr.
San Diego, CA 92131
Attention: John Reinhardt, Chief Technology Officer

The protection of your personal information is our highest concern. We sincerely regret any inconvenience this incident may cause you.

Sincerely,

Valorie Seyfert
President & Co-Founder
CUSO Financial Services, L.P.

## Precautionary Steps You Can Take to Help Protect Your Personal Information

To help protect your identity, we are offering a complimentary membership of Experian's®IdentityWorks SM. 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: **<<b2b_text_1 (Date)>>** (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: **https://www.experianidworks.com/3bcredit**
- Provide your activation code: **<<Member ID>>**

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 1-877-288-8057 by **<<b2b_text_1 (Date)>>**. Be prepared to provide engagement number **<<b2b_text_2 (Engagement #)>>** as proof of eligibility for the identity restoration services by Experian.

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 1-877-288-8057. 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 one year 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.

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security 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 security 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 security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

| **Experian** | **TransUnion** | **Equifax** |
|---|---|---|
| P.O. Box 9554 | P.O. Box 160 | P.O. Box 105788 |
| Allen, TX 75013 | Woodlyn, PA 19094 | Atlanta, GA 30348-5788 |
| 1-888-397-3742 | 1-888-909-8872 | 1-800-685-1111 |
| www.experian.com/freeze/center.html | www.transunion.com/credit-freeze | www.equifax.com/personal/credit-report-services |

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your 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 agencies listed below:

| **Experian** | **TransUnion** | **Equifax** |
|---|---|---|
| P.O. Box 9554 | P.O. Box 2000 | P.O. Box 105069 |
| Allen, TX 75013 | Chester, PA 19016 | Atlanta, GA 30348 |
| 1-888-397-3742 | 1-800-680-7289 | 1-888-766-0008 |
| www.experian.com/fraud/center.html | www.transunion.com/fraud-victim-resource/place-fraud-alert | www.equifax.com/personal/credit-report-services |

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338); 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 Maryland residents**, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-410-528-8662, 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 agencies 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 provides resources regarding identity theft protection and security breach response at www.ag.ny.gov/internet/privacy-and-identity-theft. The New York Attorney General can be contacted by phone at 1-800-771-7755; toll-free at 1-800-788-9898; and online at www.ag.ny.gov.

**For North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6000, www.ncdoj.gov. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

**For Rhode Island residents**, the Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903; www.riag.ri.gov, 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 twelve (12) Rhode Island residents impacted by this incident.