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COUGHLIN_{LLC}**
ATTORNEYS AT LAW

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JAN 18 2022

CONSUMER PROTECTION

NH DEPT OF JUSTICE
JAN 19 2022 PM 2:55

Gregory J. Bautista
Office: (267) 930-1509
Fax: (267) 930-4771
Email: gbautista@mullen.law

1266 E. Main Street, Soundview Plaza
Suite 700R
Stamford, CT 06902

January 12, 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 C Squared Systems, LLC ("C Squared"), located at 65 Dartmouth Dr., Auburn, NH 03032, and are writing to notify your Office of an incident that may affect the security of some personal information relating to twenty-two (22) 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, C Squared 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 July 26, 2021, C Squared discovered it could not access certain files on its servers. Upon discovery of the event, C Squared immediately launched an investigation with the assistance of third-party computer forensic specialists. That investigation determined that certain systems had been infected by malware which prevented access to some files on the network. The investigation also determined that certain files within the C Squared network were subject to unauthorized access. C Squared proceeded to conduct a thorough and time-intensive review of the impacted data to ensure we identified all individuals with information potentially at risk, as well as to identify contact information for those individuals. That process was completed on November 1, 2021. Although C Squared is unaware of any actual or attempted misuse of individuals' information, C Squared then took steps to provide notice of this incident to those individuals whose information was impacted.

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The information related to New Hampshire residents that could have been subject to unauthorized access were Social Security number and account information.

Notice to New Hampshire Residents

On or about January 12, 2022, C Squared began providing written notice of this incident to affected individuals, which includes approximately twenty-two (22) 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

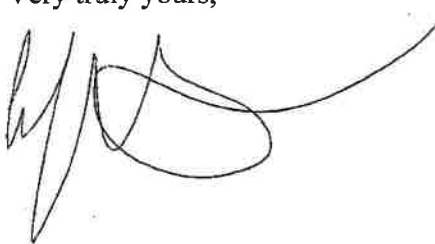
Upon discovering the event, C Squared moved quickly to investigate and respond to the incident, assess the security of C Squared systems, and notify potentially affected individuals. C Squared implemented additional security measures along with reviewing and enhancing existing policies and procedures to reduce the likelihood of a similar future event. C Squared is providing access to credit monitoring services for one year, through Kroll, to individuals whose information was potentially affected by this incident, at no cost to these individuals.

Additionally, C Squared is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including 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.

Contact Information

Should you have any questions regarding this notification or event, or wish to discuss this matter further, please contact us at 267-930-1509.

Very truly yours,

A handwritten signature in black ink, appearing to read 'G. Bautista', with a long, sweeping horizontal line extending to the right.

Gregory J. Bautista of
MULLEN COUGHLIN LLC

Enclosure
GLB/mwj

EXHIBIT A

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

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

Re: Notice of Security Incident

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

C Squared Systems, LLC (“C Squared”) is writing to inform you of an event that may impact the privacy of some of your personal information. While we are unaware of any attempted or actual misuse of your information, we are providing you with information about the event, our response, and steps you may take to protect against any misuse of your information, should you feel it necessary to do so.

What Happened? On July 26, 2021, C Squared discovered it could not access certain files on its servers. Upon discovery of the event, C Squared immediately launched an investigation with the assistance of third-party computer forensic specialists. That investigation determined that certain systems had been infected by malware which prevented access to some files on the network. The investigation also determined that certain files within the C Squared network were subject to unauthorized access. C Squared proceeded to conduct a thorough and time-intensive review of the impacted data to ensure we identified all individuals with information potentially at risk, as well as to identify contact information for those individuals. That process was completed on November 1, 2021. Although C Squared is unaware of any actual or attempted misuse of individuals’ information, C Squared is providing notice of this incident to those individuals whose information was impacted.

What Information Was Involved? The impacted information related to you includes your <<b2b_text_1(name, data elements)>>. We have no evidence your information was subject to actual or attempted misuse.

What We Are Doing. We take this incident and the security of personal information in our care very seriously. As part of our ongoing commitment to the privacy of information in our care, we are implementing additional technical security measures designed to mitigate recurrence of this type of incident. We are also reviewing and enhancing existing data privacy policies and procedures.

As an added precaution we are offering you access to twelve months of credit monitoring services through Kroll at no cost to you. If you wish to activate these services, you may follow the instructions included in the attached *Steps You Can Take to Help Protect Your Personal Information*. We encourage you to activate these services as we are unable to act on your behalf to do so.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors over the next 12 to 24 months. We also encourage you to review the *Steps You Can Take to Help Protect Your Personal Information* section of this letter which can be found on the next page.

For More Information. If you have questions about this incident that are not addressed in this letter, please contact our dedicated call center at 1-???-???-???? during Monday through Friday, between 8:00 am and 5:30 pm, excluding some U.S. holidays. Please have your membership number ready

Sincerely,

C Squared Systems

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Activate Your Identity Monitoring Services

We have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6(activation deadline)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s_n>>

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

If you prefer to activate these services offline and receive monitoring alerts via the US Postal Service, you may activate via our automated phone system by calling 1-888-653-0511, Monday through Friday, 8:00 a.m. to 5:30 p.m. Central time, excluding major U.S. holidays. Please have your membership number located in your letter ready when calling. Please note that to activate monitoring services, you will be required to provide your name, date of birth, and Social Security number through our automated phone system.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

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

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 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. C Squared Systems is located at 65 Dartmouth Drive, Auburn, NH 03032.

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/>.