



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

July 26, 2023

VIA E-MAIL

Office of the New Hampshire Attorney General
Consumer Protection & Antitrust Bureau
33 Capitol Street
Concord, NH 03301
E-mail: DOJ-CPB@doj.nh.gov

Re: Notice of Data Event

To Whom It May Concern:

We represent Cabot Risk Strategies, LLC (“Cabot”) located at 15 Cabot Road, Woburn, MA 01801, and are writing to notify your office of an incident that may affect the security of certain personal information relating to one hundred eighty-four (184) New Hampshire residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Cabot 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

Cabot is a risk management, advisory, and brokerage firm that provides services to various public and private entities, including insurance carriers, state and municipal agencies, and private corporations. To provide these services, Cabot is provided certain information relating to health, life, and disability insurance plans and workers compensation and liability claims.

On May 10, 2023, Cabot discovered a potential data security incident affecting certain of its computer systems. Cabot immediately launched an investigation, with the assistance of third-party computer forensic specialists, to determine the nature and scope of the activity. On June 5, 2023, the investigation concluded. Our investigation determined that there was limited unauthorized access to our computer systems on April 24, 2023. While the investigation was unable to determine what specific files the unauthorized actor may have accessed within its system, Cabot undertook a comprehensive review of all files on the potentially affected systems to determine the data that might be impacted, and to whom it relates. Cabot provided a summary of its investigation to potentially affected customers identified during this comprehensive review beginning on June 23, 2023. In these communications, Cabot offered to mail letters to potentially impacted individuals on behalf of these customers.

The information that could have been subject to unauthorized access includes

Notice to New Hampshire Residents

On or about July 26, 2023, Cabot began providing written notice of this incident to one hundred eighty-four (184) 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, Cabot moved quickly to investigate and respond to the incident, assess the security of Cabot systems, and identify potentially affected customer businesses and associated individuals. Further, Cabot notified federal law enforcement regarding the event and is cooperating with its investigation. Cabot is also assessing opportunities to implement additional safeguards and training to its employees. Cabot is providing access to credit monitoring and identity theft remediation services for through IDX, A ZeroFox Company, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Cabot 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. Cabot is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against 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 other aspects of the data security event, please contact us at

Very truly yours,

Gregory J. Bautista of
MULLEN COUGHLIN LLC

GJB/dep
Enclosure

EXHIBIT A



PO Box 480149
Niles, IL 60714

<<First Name>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip>>

July 26, 2023

Re: Notice of Data Security Event

Dear <<First Name>> <<Last Name>>,

Cabot Risk Strategies, LLC (“Cabot”) writes to notify you of a recent data privacy event that may affect some of your personal information. Cabot is a risk management, advisory, and brokerage firm that provides services to various public and private entities, including insurance carriers, state and municipal agencies, and private corporations. To provide these services, Cabot is provided certain information relating to health, life, and disability insurance plans and workers compensation and liability claims. Although we are unaware of any identity theft or fraud occurring as a result of this incident, we are providing you with information about the incident, our response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

What Happened? On May 10, 2023, Cabot discovered a potential data security incident affecting certain of its computer systems. Cabot immediately launched an investigation, with the assistance of third-party computer forensic specialists, to determine the nature and scope of the activity. Our investigation determined that there was limited unauthorized access to our computer systems on April 24, 2023. While we are unable to say definitively if your information was accessed by the unauthorized actor, Cabot undertook a comprehensive review of all files on the potentially affected systems to determine the data that might be impacted, and to whom it relates. We determined information related to you may have been accessible to the unknown actor during this incident. Although there is no indication that this information has been or will be misused by the unknown actor, Cabot is providing this notice out of an abundance of caution.

What Information Was Involved? The following types of information related to you that may be affected by this incident: your [redacted]. Although there is no indication that this information was or will be used to commit identity theft or fraud, Cabot is providing this notice out of an abundance of caution.

What We Are Doing. Information privacy and security are among our highest priorities. Upon discovering the incident, we immediately took steps to secure our systems. We also conducted an investigation, with the assistance of third-party forensic specialists, to confirm that the unauthorized access was limited to a brief window on April 24, 2023, to determine the nature and scope of the activity on that day, and to determine who may be affected as a result.

Cabot has strict security measures in place to protect information in our care. Upon discovering this incident, we immediately took steps to protect the privacy and security of client, partner, and employee information. Additionally, as part of our ongoing commitment to data security, we continue to assess opportunities to enhance our existing network security controls.

As an added precaution, we are also offering access to [redacted] of complimentary identity theft protection services through IDX, A ZeroFox Company. IDX identity protection services include: [redacted] of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this

protection, IDX will help you resolve issues if your identity is compromised. If you wish to receive these services, you must enroll by following the below enrollment instructions included in the “Steps You Can Take To Help Protect Personal Information” section below, as we are unable to activate these services on your behalf.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, to monitor your credit reports for suspicious activity, and to promptly report any incidents of suspected identity theft. You may also review the information contained in the attached “Steps You Can Take to Help Protect Personal Information.” There you will also find more information on the credit monitoring and identity protection services we are making available to you. While Cabot will cover the cost of these services, you will need to complete the activation process. Enrollment instructions are attached to this letter. We encourage you to contact IDX with any questions and to enroll in the free identity protection services by calling _____, or scanning the QR image and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 9 am - 9 pm Eastern Time. Please note the deadline to enroll is _____.

For More Information. If you have additional questions, please call our dedicated assistance line at _____ Monday through Friday from 9 am – 9 pm Eastern Time. You may also write to Cabot at: 15 Cabot Road, Woburn, MA 01801.

We sincerely regret any inconvenience this incident may cause you. Protecting information provided to Cabot is very important to us, and we remain committed to safeguarding the information in our care.

Sincerely,

Andrew R. Weiner, Esq.
Senior Counsel
Cabot Risk Strategies, LLC

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

Scan the QR image or go to [www.idx.com/identityprotection](#). Follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.

Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

Contact IDX at [1-877-322-8228](#) to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity. If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help. If you file a request for help or report suspicious activity, you will be contacted by a member of the IDX ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

We encourage you to remain vigilant against identity theft and fraud by reviewing all account statements and monitoring free credit reports. If you discover or suspect fraudulent activity involving a financial account, or credit or debit card, we encourage you to promptly contact the issuing bank or relevant financial institution. The number to call for assistance is usually on the back of the card.

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
1-888-298-0045	1-888-397-3742	1-800-916-8800
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 Massachusetts Residents, Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

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. You may obtain information from these sources and/or the Federal Trade Commission using the contact information noted above about steps you can take to avoid identity theft. You can write to Cabot at the following address: 15 Cabot Road, Woburn, MA 01801.

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-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 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 27 Rhode Island residents impacted by this incident.