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COUGHLIN LLC
ATTORNEYS AT LAW

RECEIVED
NOV 01 2021
CONSUMER PROTECTION

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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

October 26, 2021

VIA FIRST-CLASS 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.B. Fleet Company, Inc., a Prestige Consumer Healthcare company ("C.B. Fleet"), located at 660 White Plains Rd., 2nd Floor, Tarrytown, NY 10591-5139, and are writing to notify your office of an incident that may affect the security of some personal information relating to one (1) New Hampshire resident. 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.B. Fleet 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 or about May 3, 2021, C.B. Fleet learned of unusual activity related to two employee email accounts. Upon learning of the suspicious activity, C.B. Fleet immediately took steps to secure the email account and began working with a third-party computer forensic investigation firm to determine the nature and scope of the event. The investigation confirmed that the two C.B. Fleet employee email accounts were accessed by an unknown actor between April 11, 2021 and May 3, 2021.

The investigation was unable to determine what emails, if any, were accessed by the unauthorized actor. In an abundance of caution, C.B. Fleet worked with third-party specialists to perform a comprehensive review of all information stored in each of the two email accounts at the time of unauthorized access to confirm the identities of the individuals whose information may have been accessible to the unauthorized actor. C.B. Fleet then conducted a thorough manual review of our records to determine the identities and contact information for potentially impacted individuals. On or around September 30, 2021, C.B. Fleet completed our internal review and confirmed contact information for potentially affected individuals.

The information that could have been subject to unauthorized access may include name, address, and Social Security number.

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Notice to New Hampshire Resident

On or about October 26, 2021, C.B. Fleet provided written notice of this incident to all affected individuals, which includes one (1) New Hampshire resident. 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.B. Fleet moved quickly to investigate and respond to the incident, review their security protocols, and notify potentially affected individuals. To help ensure the ongoing protection of personal data, C.B. Fleet is also working to implement additional safeguards and training to its employees. C.B. Fleet is providing access to credit monitoring services for twelve (12) months, through Experian, to individuals whose personal information may have been potentially affected by this incident, at no cost to these individuals.

Additionally, C.B. Fleet is providing potentially 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. C.B. Fleet is providing individuals with 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 other aspects of the data security event, please contact us at (267) 930-6836.

Very truly yours,

A handwritten signature in black ink, appearing to read "Carolyn Purwin Ryan". The signature is written in a cursive style with a large initial "C" and "R".

Carolyn Purwin Ryan of
MULLEN COUGHLIN LLC

CPR/acl
Enclosure

EXHIBIT A

Fleet

PrestigeConsumer

HEALTHCARE

Return Mail Processing
PO Box 999
Suwanee, GA 30024

October 26, 2021

11 1 1964 *****SNGLP

SAMPLE A. SAMPLE - Adult Letter

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



Re: Notice of data [Extra2]

Dear Sample A. Sample:

C.B. Fleet Company, Inc., a Prestige Consumer Healthcare company (“C.B. Fleet”), is writing to inform you of an event that may impact the security 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 better protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

What Happened? On or about May 3, 2021, C.B. Fleet learned of unusual activity related to two employee email accounts. Upon learning of the suspicious activity, we immediately took steps to secure the email accounts and began working with a third-party computer forensic investigation firm to determine the nature and scope of the event. The investigation confirmed that the two C.B. Fleet employee email accounts were accessed by an unknown actor between April 11, 2021 and May 3, 2021.

The investigation was unable to determine which, if any, emails and/or attachments in the email account were viewed or otherwise accessed by the unauthorized person(s). Out of an abundance of caution, we undertook a thorough review of each of the email account’s contents to determine whether they contained any sensitive information. We recently completed this review on September 30, 2021 and determined that information related to certain individuals was present in one of the email accounts during the relevant time period. We took additional steps to identify address information for individuals such as yourself and worked to provide notice of this event as quickly as possible.

What Information Was Involved? We determined the following types of information relating to you were present in an impacted email account and may have been accessible to the unknown actor during this incident: name, address, [Extra1][Extra4]. There is no evidence this personal information was accessed and/or misused by the unknown actor, and C.B. Fleet is providing this notice in an abundance of caution.

What We Are Doing. We take this incident and the security of your personal information seriously. Upon learning of this incident, we immediately took steps to secure the affected email accounts. We are also notifying state regulators, as applicable and as required. While we are unaware of any misuse of your personal information as a result of this incident, as part of our ongoing commitment to the privacy of personal information in our care, we are offering you access to [Extra3] of credit monitoring.

What You Can Do. You can find out more about how to protect against potential identity theft and fraud in the enclosed *Steps You Can Take to Protect Your Information*. 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. You may also enroll in the complimentary credit monitoring services described above. Enrollment instructions are attached to this letter.

For More Information. If you have additional questions, please call our dedicated assistance line at (855) 744-2743, Monday through Friday, during the hours of 9:00 a.m. to 11:00 p.m., or Saturday and Sunday during the hours of 11:00 a.m. to 8:00 p.m., Eastern Time (excluding U.S. holidays). Please be prepared to reference Engagement Number **[Engagement Number]** when speaking with a representative. You may also write to C.B. Fleet Company, Incorporated, c/o Prestige Consumer Healthcare company, attn: Privacy at 660 White Plains Rd., 2nd Floor, Tarrytown, NY 10591-5139, or email us at: privacy@prestigebrands.com.

We sincerely regret any inconvenience or concern this incident may cause.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christine Sacco', written in a cursive style.

Christine Sacco
Vice President and Treasurer
C.B. Fleet Company, Incorporated

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for [Extra3].

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 [Extra3] 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 [Extra3] 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 January 31, 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: ABCDEFGHI**

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 **(855) 744-2743** by January 31, 2022. Be prepared to provide engagement number [**Engagement Number**] as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR [EXTRA3] 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.

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	1-833-395-6938
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 St. NW Washington, D.C. 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-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 3 Rhode Island residents impacted by this incident.