



MULLEN  
COUGHLIN<sub>LLC</sub>  
ATTORNEYS AT LAW

RECEIVED

OCT 30 2018

CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302  
Wayne, PA 19087

October 25, 2018

**VIA U.S. MAIL**

Attorney General Gordon J. MacDonald  
Office of the New Hampshire Attorney General  
Attn: Security Breach Notification  
33 Capitol Street  
Concord, NH 03301

**Re: Notice of Data Event**

Dear Attorney General MacDonald:

We represent Cendera Funding, Inc. ("Cendera"), 3600 Benbrook Highway, Fort Worth, TX 76116, and write to notify your office of an incident that may affect the security of certain information relating to approximately two (2) New Hampshire residents. The investigation into this event is ongoing and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Cendera does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

**Nature of the Data Event**

On Saturday, September 29, 2018, Cendera was notified that its administration offices were burglarized. Cendera took immediate steps to investigate the incident, including reporting this incident to local law enforcement. While Cendera's investigation into this event is still ongoing, Cendera determined that an external hard drive containing information relating to certain Cendera current and former clients, vendors and employees was taken in the burglary.

Cendera promptly took steps to determine what information would have been contained on the hard drive by reviewing the contents of the files that were backed up to the stolen hard drive. As part of the investigation into this incident, Cendera determined that files containing name, address, and Social Security number were stored on the hard disk drive. To date, Cendera has no evidence of any attempted or actual misuse of personal data as a result of this incident.

### **Notice to New Hampshire Residents**

On October 25, 2018, Cendera began providing written notice of this incident to affected individuals, including two (2) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

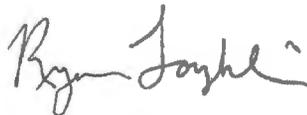
### **Other Steps Taken and To Be Taken**

Cendera is providing all potentially impacted individuals with complimentary access to 12 months of identity theft protection and mitigation services through AllClear ID. Cendera is also 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, 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. Cendera is providing written notice of this event to other state regulators as necessary.

### **Contact Information**

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

Very truly yours,



Ryan C. Loughlin of  
MULLEN COUGHLIN LLC

RCL:nsj  
Enclosure

# **EXHIBIT A**



Processing Center • P.O. BOX 141578 • Austin, TX 78714



JOHN Q. SAMPLE  
1234 MAIN STREET  
ANYTOWN US 12345-6789

October 25, 2018

**Re: Notice of Data Breach**

Dear John Sample:

We are writing to inform you of a recent incident that may affect the security of your personal information. The privacy and protection of information within our care is a matter we take seriously, and we encourage you to review the information provided in this letter for steps that you may take to better protect yourself against potential misuse of your information, should you feel it appropriate to do so.

**What Happened?** On Saturday, September 29, 2018, Cendera Funding, Inc. ("Cendera") was notified that its administration offices were burglarized. Cendera took immediate steps to investigate the incident, including reporting this incident to local law enforcement. While Cendera's investigation into this event is still ongoing, we determined that an external hard drive containing information related to certain current and former clients, vendors and employees was taken in the burglary.

**What Information Was Involved?** As part of the investigation into this incident, we determined that a file containing the following information relating to you was stored on the hard drive: your name and Social Security number. To date, we have no evidence of any attempted or actual misuse of personal data as a result of this incident.

**What We Are Doing.** We take the security of your personal information very seriously. We promptly took steps to determine what information would have been contained on the hard drive so that all affected individuals would be promptly notified of this incident. We are also offering you access to 12 months of complimentary credit monitoring and identity restoration services with AllClear ID at no cost to you. Instructions on how to enroll and receive these services are included in the enclosed *Steps You Can Take to Protect Against Identity Theft and Fraud*.

**What You Can Do.** We encourage you to enroll and receive the complimentary credit monitoring and identity restoration services with AllClear ID. You also can take the steps described in the enclosed *Steps You Can Take to Protect Against Identity Theft and Fraud* to better protect yourself.

**For More Information.** We recognize that you may have questions that are not answered in this letter. Should you have additional questions, please contact our dedicated assistance line at 1-855-865-4455, Monday through Saturday from 8:00 a.m. to 8:00 p.m. CT, excluding major U.S. holidays. Cendera can also be reached by mail at 3600 Benbrook Highway in Fort Worth, TX 76116.



01-02-1

Cendera sincerely regrets any inconvenience or concern this incident may cause you and remains committed to safeguarding the personal information in its care.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Browning". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Mark Browning, CPA, CTP, CGMA  
Chief Financial Officer  
Cendera Funding, Inc.

## ***Steps You Can Take to Protect Against Identity Theft and Fraud***

### **Enroll in Credit Monitoring**

As an added precaution, we have arranged to have AllClear ID protect your identity for 12 months at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next 12 months.

**AllClear Identity Repair:** This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-865-4455 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

**AllClear Fraud Alerts with Credit Monitoring:** This service offers the ability to set, renew, and remove 90-day fraud alerts on your credit file to help protect you from credit fraud. In addition, it provides credit monitoring services, a once annual credit score and credit report, and a \$1 million identity theft insurance policy. For a child under 18 years old, AllClear ID ChildScan identifies acts of fraud against children by searching thousands of public databases for use of your child's information. To enroll in this service, you will need to provide your personal information to AllClear ID. You may sign up online at [enroll.allclearid.com](http://enroll.allclearid.com) or by phone by calling 1-855-865-4455 using the following redemption code: Redemption Code.

Please note: Following enrollment, additional steps are required by you in order to activate your phone alerts and fraud alerts, and to pull your credit score and credit file. Additional steps may also be required in order to activate your monitoring options.

### **Monitor Your Accounts**

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](http://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**  
P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/  
freeze/center.html](http://www.experian.com/freeze/center.html)

**TransUnion**  
P.O. Box 2000  
Chester, PA 19016  
1-800-909-8872  
[www.transunion.com/  
credit-freeze](http://www.transunion.com/credit-freeze)

**Equifax**  
P.O. Box 105788  
Atlanta, GA 30348-5788  
1-800-685-1111  
[www.equifax.com/personal/  
credit-report-services](http://www.equifax.com/personal/credit-report-services)



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:

<b>Experian</b> P.O. Box 2002 Allen, TX 75013 1-888-397-3742 <a href="http://www.experian.com/fraud/center.html">www.experian.com/fraud/center.html</a>	<b>TransUnion</b> P.O. Box 2000 Chester, PA 19016 1-800-680-7289 <a href="http://www.transunion.com/fraud-victim-resource/place-fraud-alert">www.transunion.com/fraud-victim-resource/place-fraud-alert</a>	<b>Equifax</b> P.O. Box 105069 Atlanta, GA 30348 1-888-766-0008 <a href="http://www.equifax.com/personal/credit-report-services">www.equifax.com/personal/credit-report-services</a>
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Although we have no reason to believe that your personal information has been used to file fraudulent tax returns, you can contact the IRS at [www.irs.gov/Individuals/Identity-Protection](http://www.irs.gov/Individuals/Identity-Protection) for helpful information and guidance on steps you can take to address a fraudulent tax return filed in your name and what to do if you become the victim of such fraud. You can also visit [www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft](http://www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft) for more information.

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](http://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 North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, [www.ncdoj.gov](http://www.ncdoj.gov).

**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](http://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.