

October 29, 2021

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Via electronic-mail: DOJ-CPB@doj.nh.gov; AttorneyGeneral@doj.nh.gov

Attorney General John M. Formella

Consumer Protection Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03302

Re:	Our Client	:	Certified Automotive Lease Corp.
	Matter	:	Data Security Incident on September 18, 2021
	Wilson Elser File #	:	16516.01636

Dear Attorney General Formella:

We represent Certified Automotive Lease Corp. dba CAL Automotive (“CAL”), located in Voorhees, New Jersey, with respect to a potential data security incident described in more detail below. CAL takes the security and privacy of the information in its control seriously, and has taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the security breach, the number of New Hampshire residents being notified, what information has been compromised, and the steps that CAL is taking to restore the integrity of the system. We have also enclosed hereto a sample of the notification made to the potentially impact individuals, which includes an offer of free credit monitoring.

1. Nature of the Security Incident

It appears that on or around September 18, 2021, CAL was the target of a cybersecurity incident. An unauthorized third party attempted to infiltrate CAL’s computer systems. This incident may have resulted in the exposure of personal information that is located on CAL’s systems, including full name, home address, email address, social security number, date of birth, and/or other sensitive financial information that could have been located on lease documents.

CAL, however, is not aware of any evidence that information has been misused. CAL has not received any reports of related identity theft since the date of the incident (September 18, 2021 to present).

2. Number of New Hampshire Residents Affected

A total of thirty-eight (38) residents of New Hampshire were potentially affected by this security incident. Notification letters to these individuals were mailed on October 26, 2021, by first class mail. A sample copy of the notification letter is included with this letter.

3. Steps Taken

Upon learning of this incident, CAL moved quickly to institute a response plan, which included conducting an investigation with the assistance of third-party forensic specialists and engaging in steps to confirm the security of any relevant systems. CAL has reported this incident to law enforcement. CAL has reviewed, altered and enhanced its policies and procedures relating to the security of its systems and servers, as well as its information life cycle management.

4. Contact Information

CAL remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at Robert.Walker@WilsonElser.com or 601.499.8083.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP

A handwritten signature in blue ink, appearing to read 'RW' followed by a stylized flourish.

Robert F. Walker, Esq.
RW / rmc

Copy: Ryan M. Cook, Esq. (Wilson Elser LLP)

Enclosure: *Sample Notification Letter*

To Enroll, Please Call:
1-833-989-3934
Or Visit:
<https://response.idx.us/cal-credit-protection>
Enrollment Code: <<Enrollment>>

Via First Class Mail

October 26, 2021

<<FirstName>> <<LastName>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

Dear <<FirstName>> <<LastName>>:

We are writing to notify you of an incident that may have exposed your personal information. We take the privacy of your personal information seriously and want to provide you with information and resources you can use to protect your information. In this letter we provide you with information about the incident and information about how to protect your information going forward.

What Happened and How We Responded:

On September 18, 2021, CAL Automotive detected and stopped a network security incident in which an unauthorized third party infiltrated our network. Upon detecting this incident, we moved quickly to initiate our incident response, which included securing and remediating our network and the data we maintain. We immediately engaged a specialized third-party forensic and technical resources firm to respond to the incident, and notified law enforcement. Once our environment was secure, we initiated a comprehensive investigation into the extent of the unauthorized activity. As of this writing, CAL Automotive has not received any reports of related identity theft since the date of the incident.

What Information Was Involved:

The data accessed included some or all of the following information: first and last name, personal or business mailing address, email address or phone number. In some instances, the data also included information about a vehicle purchased, leased or inquired about, such as the Vehicle Identification Number. The data also included more sensitive information relating to eligibility for a purchase, loan or lease. This included driver's license numbers, dates of birth, Social Security numbers, account or loan numbers, and tax identification numbers.

What You Can Do:

We value the safety of your personal information and are offering free credit monitoring and identity theft protection services for you through IDX. IDX's services include: <<MembershipOfferingLength>> of credit and CyberScan monitoring and fully managed identity theft recovery services.

We encourage you to remain vigilant against incidents of identity theft and fraud by enrolling in this free identity theft protection and credit monitoring. Please contact IDX with any questions and to enroll in these services by calling 1-833-989-3934 or going to <https://response.idx.us/cal-credit-protection> and using the Enrollment Code provided above. IDX is available to respond to your questions Monday through Friday, 9 am to 9 pm Eastern time. Please note that the deadline to enroll in this free service is January 26, 2022. We encourage you to take full advantage of this service offering. You will need to reference the enrollment code at the top of this letter when calling or enrolling online, so please do not discard this letter.

For More Information:

We recognize that you may have questions not addressed in this letter. If so, please contact IDX at 1-833-989-3934.

CAL Automotive values the security of your personal data, and we apologize for any inconvenience that this incident may have caused.

Sincerely,

CAL Automotive Management Team

Additional Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 https://www.equifax.com/personal/credit-report-services/credit-freeze/	Experian Security Freeze P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	TransUnion Security Freeze P.O. Box 160 Woodlyn, PA 19094 1-800-909-8872 www.transunion.com/credit-freeze
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Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with:

- Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf);
- TransUnion (<https://www.transunion.com/fraud-alerts>); or
- Experian (<https://www.experian.com/fraud/center.html>).

A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are located above.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: 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. 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, 1-888-743-0023, 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 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 violators. 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 at 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 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, and www.ncdoj.gov.

For New York residents, the Attorney General may be contacted at Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, and <https://ag.ny.gov/>. The New York Division of Consumer Protection can be found at <https://dos.ny.gov/identity-theft-prevention-and-mitigation-program>.

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, and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident.

For New Jersey Residents:

New Jersey Division of Consumer Affairs/Office of Consumer Protection
<https://www.njconsumeraffairs.gov/ocp/Pages/identitytheft.aspx>
(800) 242-5846

For Pennsylvania Residents:

Pennsylvania Office of Attorney General/Identity Theft
<https://www.attorneygeneral.gov/protect-yourself/identity-theft/>
(717) 787-3391