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NOV 02 2021

CONSUMER PROTECTION



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

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426 W. Lancaster Avenue, Suite 200
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October 27, 2021

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 Charter Next Generation, Inc. (“CNG”) located at 1264 E High Street Milton, WI 53563, and are writing to notify your office of an incident that may affect the security of some personal information relating to nine (9) 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, CNG 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 June 3, 2021, CNG became aware of suspicious activity related to its email systems. CNG launched an immediate investigation of the incident, with the assistance of third-party forensic specialists to investigate the nature and scope of the activity. CNG determined that an unauthorized actor had access to a CNG employee email account between May 25, 2021 and June 2, 2021. With the assistance of document review specialists, CNG thoroughly reviewed the contents of the involved email account to determine what, if any, personal information may have been stored in the email account at the time of the unauthorized access. This process involved both a programmatic and manual review of the data. CNG also conducted an extensive review of its internal records and worked with third-party specialists to identify the individuals associated with this information and their address to provide notice of the event and credit monitoring and identity theft monitoring services. On September 16, 2021, CNG determined the involved email account may have contained certain personal information related to New Hampshire residents. To date,

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CNG has no evidence of actual or attempted fraudulent use of personal information related to this incident.

The personal information that could have been subject to unauthorized access includes the name, Social Security number, driver's license number, and health insurance information of nine (9) New Hampshire residents.

Notice to New Hampshire Residents

On October 27, 2021, CNG provided written notice of this incident to all affected individuals, which includes nine (9) 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, CNG moved quickly to investigate and respond to the incident, assess the security of CNG systems, and notify potentially affected individuals. CNG is also working to implement additional safeguards and training to its employees. CNG is providing access to credit monitoring services for one (1) year, through TransUnion, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, CNG 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. CNG 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) 930-4775.

Very truly yours,



Christopher J. DiLenno of
MULLEN COUGHLIN LLC

EXHIBIT A



Return Mail Processing Center
PO Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>> <<Date>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Variable Header>>

Dear <<Name1>>:

We write to notify you of a recent incident that may affect the security of some of your personal information. Although at this time, there is no indication that your information has been used for a fraudulent purpose in relation to this incident, we are providing you with information about the incident, our response to it, and steps you can take in addition to those you take every day to protect your personal information, should you feel it appropriate to do so.

What Happened? On June 3, 2021, Charter Next Generation, Inc. (“CNG”) became aware of suspicious activity related to our email systems. We launched an immediate investigation of the incident, with the assistance of third-party forensic specialists to investigate the nature and scope of the activity. Through this investigation, we determined that an unauthorized actor had access to a CNG employee email account between May 25, 2021 and June 2, 2021. We reviewed the contents of the impacted email account thoroughly to determine what, if any, personal information may have been stored in the email account at the time of the unauthorized access. We also conducted an extensive review of our internal records and worked with third party specialists to identify the individuals associated with this information and their address for purposes of providing notice. On September 16, 2021, we determined the involved email account may have contained certain personal information related to you. To date, we have no evidence of actual or attempted fraudulent use of your information related to this incident.

What Information Was Involved? Our investigation determined that at the time of the incident the involved email account may have contained personal information such as your name, <<Breached Elements>>.

What We Are Doing. Safeguarding the privacy of information in our care and the security of our network is among our highest priorities. CNG has strict security measures in place to protect information in our care. Upon learning of this issue, we immediately took steps to secure our email platform, changed passwords and conducted a diligent investigation with the assistance of third-party specialists to confirm the full nature and scope of the incident. We also took action to further enhance our security measures to protect our network systems and data.

As an added precaution, we are offering you access to <<12/24 months>> of credit monitoring through TransUnion at no cost to you. More information about these services and instructions on how to enroll may be found in the enclosed “Steps You Can Take to Protect Personal Information.” We are unable to act on your behalf so if you would like to enroll in these services, you must follow the instructions in the enclosure.

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. Please review the enclosed “Steps You Can Take to Protect Personal Information” for instructions on how to enroll in the free credit monitoring services we are providing to you and to learn about additional ways to protect your personal information, should you feel it appropriate to do so.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 800-776-1558, Monday-Friday: 9:00 a.m.-9:00 p.m. Eastern Time, excluding major U.S. holidays. You may also write to us at Charter Next Generation 1264 E High Street Milton, WI 53563.

CNG remains committed to safeguarding information in our care and we regret any inconvenience this notice may cause you.

Sincerely,

Signature

Charter Next Generation

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*myTrueIdentity*) for <<12/24 months>> provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies.

To enroll in this service, go directly to the *myTrueIdentity* website at www.mytrueidentity.com and in the space referenced as “Enter Activation Code”, enter the following unique 12-letter Activation Code <<Activation Code>> and follow the three steps to receive your credit monitoring service online within minutes.

If you do not have access to the Internet and wish to enroll in a similar offline, paper based, credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the following 6-digit telephone pass code <<Pass Code>> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

Once you are enrolled, you will be able to obtain <<12/24 months>> of unlimited access to your TransUnion credit report and VantageScore® credit score by TransUnion. The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion®, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The service also includes the ability to lock and unlock your TransUnion credit report online, access to identity restoration services that provide assistance in the event your identity is compromised to help you restore your identity and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

You can sign up for the *myTrueIdentity* online Credit Monitoring service anytime between now and <<Enrollment Deadline>>. Please note that credit monitoring services might not be available for individuals who do not have a credit file at TransUnion®, or an address in the United States (or its territories) and a valid Social Security number, or are under the age of 18. Enrolling in this service will not affect your credit score.

If you have questions about your *myTrueIdentity* online credit monitoring benefits, need help with your online enrollment, or need help accessing your credit report, or passing identity verification, please contact the *myTrueIdentity* Customer Service Team toll-free at: 1-844-787-4607, Monday-Friday: 8am- 9pm, Saturday-Sunday: 8am-5pm Eastern time.

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 District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 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 a 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 [X] Rhode Island residents impacted by this incident.