



MULLEN
COUGHLIN
ATTORNEYS AT LAW

STATE OF NH
DEPT OF JUSTICE
2019 SEP 30 PM 12:26

Ryan C. Loughlin
Office: 267-930-4786
Fax: 267-930-4771
Email: rloughlin@mullen.law

1275 Drummers Lane, Suite 302
Wayne, PA 19087

September 26, 2019

INTENDED FOR ADDRESSEE(S) ONLY

VIA U.S. MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301

RE: Notice of Data Event

Dear Attorney General Gordon J. MacDonald:

We represent Children's Hope Alliance, PO Box 1, Barium Springs, North Carolina 28010 and are writing to notify your office of an incident that may affect the security of personal information relating to New Hampshire residents. The investigation into this event is ongoing and this notice may be supplemented with new significant facts learned subsequent to its submission. By providing this notice, Children's Hope Alliance 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.

Background

On May 15, 2019, Children's Hope Alliance became aware of suspicious activity in an employee email account. Children's Hope Alliance immediately began an investigation to determine what happened and what information may have been affected. With the assistance of third-party forensic investigators, it determined that certain employee email accounts were subject to unauthorized access between April 23, 2019 and May 20, 2019. These email accounts were then reviewed to determine whether they contained any protected health or personal information. This was a resource heavy review that took several weeks to complete. On July 30, 2019, Children's Hope Alliance determined that the accounts subject to unauthorized access contained personal and protected health information of certain individuals. On August 1, 2019 Children's Hope Alliance began notifying business partners who may have provided Children's Hope Alliance with the

information related to the potentially affected individuals. However, the list of potentially affected individuals provided by the vendor did not include addresses for a large number of individuals and included many duplicates. Therefore, Children's Hope Alliance was required to review its records to attempt to locate the missing addresses and remove potential duplicates. This process was completed on September 10, 2019.

The investigation determined that this event could impact certain personal information, including Social Security number.

Notice to New Hampshire Resident

On September 26, 2019, Children's Hope Alliance began mailing written notice of this incident to the individuals who had personal information accessible within the impacted email account, which includes approximately one (1) New Hampshire resident. Notice was mailed in substantially the same form as the letter attached hereto as *Exhibit A*.

Children's Hope Alliance is also providing access to identity protection and credit monitoring services for one (1) years, through ID Experts, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Children's Hope Alliance is providing potentially 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. Children's Hope Alliance is also providing written notice of this incident 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/ljk
Enclosures

EXHIBIT A



C/O ID Experts
 PO Box 4219
 Everett WA 98204

ENDORSE



NAME



ADDRESS1

ADDRESS2

CSZ

SEQ
 CODE 2D COUNTRY
 Ver1G

BREAK

To Enroll, Please Call:

1-833-959-1353

Or Visit:

<https://ide.myidcare.com/cha>

Enrollment Code: <<XXXXXXXXXX>>

September 26, 2019

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

Children's Hope Alliance is writing to advise you of a recent event that may impact the security of certain personal information related to you. While we are unaware of any actual or attempted misuse of your information, we write to provide you with information about the event, steps taken since discovering the event, and what you can do to better protect against potential misuse of your information, should you feel it is appropriate to do so.

What Happened? Children's Hope Alliance became aware of suspicious activity in an employee email account and immediately began an investigation to determine what happened and what information may have been affected. With the assistance of third-party forensic investigators, we determined that certain employee email accounts were subject to unauthorized access between April 23, 2019 and May 20, 2019. The investigation was unable to determine which emails or attachments may have been viewed so in an abundance of caution, these email accounts were then reviewed to determine whether they contained any personal or protected health information. On July 30, 2019, we concluded our review of the compromised email accounts. However, the preliminary results contained a large number of duplicates and missing addresses. To ensure that individuals requiring notice received a letter, we conducted an extensive internal review process to identify missing information. On September 10, 2019, Children's Hope Alliance completed the review and determined that the accounts subject to unauthorized access contained personal and protected health information of certain individuals, including you.

What Information Was Involved? The email accounts subject to unauthorized access contained some combination of the following types of information: your name, Social Security number, treatment information, driver's license number or state identification number, financial account information, username and password, and health insurance information. Children's Hope Alliance has no evidence that this information has been misused as a result of this event.

What We Are Doing. Children's Hope Alliance is committed to, and takes very seriously, its responsibility to protect all data entrusted to us. As part of our incident response, we changed the log-in credentials for the employee email accounts involved. Since then, we have continued ongoing efforts to enhance security controls and to implement additional controls to help protect employee email accounts from unauthorized access. In an abundance of caution, we are also notifying potentially affected individuals, including you, so that you may take further steps to best protect your personal information, should you feel it is appropriate to do so. We are also notifying any required federal and state regulators.

As an added precaution, we are offering you access to 12 months of free credit/identity monitoring and identity restoration services through ID Experts. We encourage you to take advantage of these identity protection services. Your identity monitoring services include Credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services.

What You Can Do. You can review the attached *Steps You Can Take to Protect Against Identity Theft and Fraud*. You can also enroll to receive the free services being offered to you.

For More Information. If you have questions or concerns that are not addressed in this notice letter, you may call the dedicated assistance line we've established regarding this incident. Please call 1-833-959-1353 Monday through Friday from 9:00 a.m. to 9:00 p.m. Eastern Time.

We sincerely regret the inconvenience this incident causes for you.

Sincerely,

A handwritten signature in cursive script that reads "Celeste Dominguez".

Celeste Dominguez
President and CEO
Children's Hope Alliance
Enclosure

Steps You Can Take to Protect Against Identity Theft and Fraud

Enroll in Credit Monitoring

Children's Hope Alliance is providing you with access to twelve (12) months of credit monitoring and identity theft protection services (MyIDCare™) through ID Experts®. To enroll please visit <https://ide.myidcare.com/cha> or call 1-833-959-1353 using the Enrollment Code provided above. Please note the deadline to enroll is December 26, 2019.

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 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
PO Box 9554
Allen, TX 75013
1-888-397-3742

www.experian.com/freeze/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872

www.transunion.com/credit-freeze

Equifax
PO Box 105788
Atlanta, GA 30348-5788
1-800-685-1111

www.equifax.com/personal/credit-report-services

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

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:

Experian
P.O. Box 2002
Allen, TX 75013
1-888-397-3742

www.experian.com/fraud/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-680-7289

www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008

www.equifax.com/personal/credit-report-services

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 and your state Attorney General. This notice has not been delayed by law enforcement.

For North Carolina residents: Office of the Attorney General of North Carolina, 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, www.ncdoj.gov.

Maryland Residents: Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us/Consumer.