MULLEN COUGHLIN LLC
ATTORNEYS AT LAW

RECEIVED
APR 17 2023
CONSUMER PROTECTION

309 Fellowship Road, Suite 200
Mt. Laurel, NJ 08054

April 14, 2023

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

To Whom It May Concern:

We represent Cleo Communications US, LLC ("Cleo") located at 4949 Harrison Avenue, Suite 200, Rockford, Illinois 61108, and write to notify your office of an event that may affect the security of certain personal information relating to approximately nine (9) New Hampshire residents. This notice may be supplemented in the event any significant new facts are learned subsequent to its submission. By providing this notice, Cleo 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 November 12, 2022, Cleo became aware that certain computer servers and systems in its environment were inaccessible. Cleo immediately took steps to secure its systems and conducted an investigation with the assistance of third-party cybersecurity and digital forensic specialists to determine the full nature and scope of the event and assess the security of Cleo's systems. Cleo also promptly reported the event to federal law enforcement.

Through its investigation, Cleo determined an unknown actor gained access to a limited number of company systems between October 28, 2022 and November 13, 2022, and certain files on those systems may have been viewed or downloaded. Therefore, in an abundance of caution, Cleo conducted a thorough review of the files to identify whether personal information was contained therein and to whom that information related. Cleo recently concluded its internal review and determined that certain personal information was contained within the affected computer systems. Cleo then took steps to notify the potentially affected individuals out of an abundance of caution.

The information that could have been subject to unauthorized access for New Hampshire residents includes .

Notice to New Hampshire Residents

On or about April 14, 2023, Cleo provided written notice of this event to potentially affected individuals, including approximately 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 becoming aware of the event, Cleo moved quickly to investigate and respond, assess the security of its systems, and identify potentially affected individuals. Cleo also promptly notified federal law enforcement. Further, Cleo implemented additional technical safeguards to reduce the risk of recurrence. Cleo is providing access to credit monitoring services for two (2) years, through Experian, to individuals whose personal information was potentially affected by this event, at no cost to these individuals. Cleo also established a dedicated assistance telephone line to address questions or concerns from notified individuals.

Additionally, Cleo is providing potentially affected 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. Cleo is providing individuals with 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.

Contact Information

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

Very truly yours,

Samuel Sica, III of
MULLEN COUGHLIN LLC

SZS/lac
Enclosure

EXHIBIT A

Cleo®

Return Mail Processing
PO Box 999
Suwanee, GA 30024

5 1 644 **********SNGLP
SAMPLE A. SAMPLE - L01
APT ABC
123 ANY ST
ANYTOWN, US 12345-6789

April 14, 2023

[Re: Notice of Data Breach]

Dear Sample A. Sample:

Cleo Communications US, LLC ("Cleo," "we," or "our") is writing to inform you of a recent data security event that may involve some 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 appropriate to do so.

What Happened? On November 12, 2022, we became aware that certain computer systems in our environment were inaccessible. We immediately took steps to secure our systems and launched a comprehensive investigation with the assistance of outside specialists to determine the full nature and scope of the event. We also promptly reported the event to federal law enforcement. Through our investigation, we determined that an unknown actor had access to a limited number of Cleo systems between October 28, 2022 and November 13, 2022, and certain files on those systems may have been viewed or downloaded. Therefore, in an abundance of caution, we conducted a thorough review of the files to identify whether personal information was contained therein and to whom that information related. We recently concluded our internal review.

What Information Was Involved? We determined that your name and the following information may have been present in the affected systems and accessible to the unknown actor during this event: [Extra1]. Although there is no indication of identity theft or fraud resulting from this event, we are providing this notice in an abundance of caution.

What We Are Doing. We take this event, and information security, very seriously. Upon learning of the event, we immediately took steps to secure our systems and conducted an investigation to confirm the nature and scope of the activity and determine who may be affected. Additionally, while we have safeguards in place to protect data in our care, we are reviewing and further enhancing these protections as part of our ongoing commitment to data security. We also reported this event to federal law enforcement and government regulators.

As an added precaution, we are also offering you twenty-four (24) months of credit monitoring and identity restoration services at no cost to you through Experian. Enrollment instructions are enclosed with this letter.

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 credit reports for suspicious activity and to detect errors. Please review the enclosed *Steps You Can Take to Help Protect Your Personal Information* for useful information on what you can do to better protect against possible misuse of your information. You may also enroll in the free credit monitoring services we have provided for you.

For More Information. If you have additional questions, you may contact our call center at (- Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays). Be prepared to provide engagement number when you call. You may also write to Cleo at 4949 Harrison Avenue, Suite 200, Rockford, IL 61108.

Sincerely,

Cleo Communications US, LLC

Steps You Can Take to Help Protect Personal Information

Enroll in Credit Monitoring Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorks℠ for 24 months.

If you believe there was fraudulent use of your information as a result of this event 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 event (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 24 months 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 24-month 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** August 31, 2023 (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: https://www.experianidworks.com/credit
- Provide your **activation code**:

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this event, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (833) 420-2849 by August 31, 2023. Be prepared to provide engagement number as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 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 ExtendCARE™:** 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 a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any 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 a consumer's name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of 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 they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, 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	1-800-916-8800
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

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state attorney general. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and state attorney general. This notice has not been delayed by law enforcement.

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.