



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED
AUG 30 2018
CONSUMER PROTECTION

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August 27, 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 Security Incident

Dear Attorney General MacDonald:

We represent CNG Financial Corporation, Inc. ("CNG"), 7755 Montgomery Road, Suite 400, Cincinnati, OH, 45236, and are writing to notify you of a recent incident that may affect the security of the personal information of one (1) New Hampshire resident. CNG's response to this incident 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 incident notification statute, or personal jurisdiction.

Nature of the Data Security Incident

On July 11, 2018, CNG mailed a package with a USB drive containing CNG customer information to a third-party vendor that performs routine auditing services for CNG. On July 16, 2018, the vendor reported that the package was delivered by UPS in a damaged state, and that the USB drive was missing. CNG immediately launched an investigation with the assistance of UPS to determine what happened and to try to recover the missing USB drive. Based on the investigation to date, the missing USB drive has not been located.

Although CNG has no evidence that the personal information stored on the USB drive was actually obtained or viewed by an unauthorized person, CNG is providing notice of the incident to the individuals whose information was stored on the USB drive out of an abundance of caution. The missing USB drive contained certain CNG customers' names, addresses, Social Security numbers, and CNG loan information.

Notice to New Hampshire Resident

On August 15, 2018, CNG began mailing written notice of this incident to potentially impacted individuals, including one (1) New Hampshire resident. The notice to affected individuals was provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken

In addition to working with UPS to investigate this incident, CNG is offering affected individuals complimentary access to one year of free credit monitoring and identity restoration services through AllClear. CNG is also providing potentially affected individuals with information on how to protect against identity theft and fraud, including information regarding contacting the Federal Trade Commission, the state attorney general, and law enforcement to report any attempted or actual identity theft and fraud. In addition to providing notice of this incident to you, CNG will be providing notice to other state regulators.

While this incident occurred after the information left CNG's possession, CNG is continuously working to enhance its own security measures and provide training and education to its employees to prevent similar future incidents.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security incident, please contact me at (267) 930-4776.

Very truly yours,



Edward J. Finn of
MULLEN COUGHLIN LLC

EJF:plm
Enclosure

EXHIBIT A

AXCESS FINANCIAL

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



00001
JOHN Q. SAMPLE
1234 MAIN STREET
ANYTOWN US 12345-6789

August 15, 2018

RE: Notice of Data Breach

Dear John Sample:

CNG Financial Corporation, Inc. (“CNG”), and its administrative services company Axxess Financial Services, which operate as Check n’ Go and Allied Cash Advance, are writing to notify you of an incident that may affect the security of some of your personal information. We take this incident very seriously. This letter provides details regarding what happened and the resources that are available to you to help protect your information from possible misuse, should you feel it is appropriate to do so.

What Happened? On July 11, 2018, CNG sent confidential customer information via courier service to a third-party vendor. The vendor performs routine auditing services for CNG. On July 16, 2018, the vendor reported that the package was delivered by the courier service in a damaged state, and that the device containing the confidential information was missing. CNG immediately launched an investigation with the assistance of the courier service to determine what happened and to try to recover the missing information. Based on our investigation to date, we have not yet located the missing information.

What Information Was Involved? We have no evidence that your personal information was actually obtained or viewed by an unauthorized person. In the interest of caution, however, we are notifying you of this incident because the following types of your information were stored on the missing device: your name, address, Social Security number, and CNG loan information.

What Are We Doing? Information privacy and security are among our highest priorities. CNG has strict security measures to protect the information in our possession. While this incident occurred after the information left our possession, we are continuously working to enhance our own security measures and provide training and education to our employees to prevent similar future incidents. In addition to working with the courier service to investigate this incident, we are also offering you access to credit monitoring and identity theft protection, as detailed below.

What Can You Do? Although we are not aware of any actual or attempted misuse of your information, we arranged to have AllClear ID protect your identity for 12 months at no cost to you as an added precaution. Please review the instructions contained in the attached “Steps You Can Take to Protect Your Information” to enroll in and receive these services. CNG will cover the cost of this service; however, you will need to enroll yourself in the credit monitoring service.



01-02-1-00

For More Information: We recognize that you may have questions not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-855-803-1478 (toll free), Monday through Saturday, 9:00 a.m. to 9:00 p.m., ET.

We sincerely regret any inconvenience this incident may cause you. CNG and Axxess Financial Services remain committed to safeguarding the information in our care, and we will continue to take steps to ensure the security of our systems.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Clark', written in a cursive style.

Doug D. Clark, President
Axxess Financial Services, Inc.

Steps You Can Take to Protect Your Information

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 1-855-803-1478 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. 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 or by phone by calling 1-855-803-1478 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. To further protect against possible identity theft or other financial loss, we encourage you to remain vigilant, 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 bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228.

Credit Reports. 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.

Fraud Alerts. At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

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

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



Security Freeze. You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft, and you provide the credit bureau with a valid police report, it cannot charge you to place, lift, or remove a security freeze. In all other cases, depending on your residence, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files.

To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
<https://www.freeze.equifax.com>

Experian Security Freeze
P.O. 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/securityfreeze

Additional Information. You can further educate yourself regarding identity theft, and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue, NW, Washington, DC 20580; www.ftc.gov/idtheft; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC. You can also further educate yourself about placing a fraud alert or security freeze on your credit file by contacting the FTC or your state's Attorney General. **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, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. Instances of known or suspected identity theft should also be reported to law enforcement. **For North Carolina Residents:** The North Carolina Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400, and online at www.ncdoj.gov. *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); and TTY: 1-866-653-4261. The Federal Trade Commission encourages those who discover that their information has been misused to file a complaint with them. Instances of known or suspected identity theft should be reported to law enforcement, the Federal Trade Commission, and your state Attorney General. This notice has not been delayed by law enforcement.