



MULLEN  
COUGHLIN<sup>LLC</sup>  
ATTORNEYS AT LAW

RECEIVED  
JUL 06 2020  
CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302  
Wayne, PA 19087

June 30, 2020

**VIA FIRST-CLASS 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 Codal Inc. (“Codal”) located at 11 East Hubbard, Suite 600, Chicago, Illinois 60611, and are writing to notify your office of an incident that may affect the security of some personal information relating to six (6) 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, Codal 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 January 24, 2020, Codal became aware that certain information stored online may have been inadvertently accessible without authorization. The information at issue relates to individuals associated with Codal’s client, RedEx Media LLC (“RedEx”). Upon discovery, access to the information was immediately disabled, and an investigation was launched which included working with third-party forensic experts to determine the full nature and scope of this incident. On February 27, 2020, it was determined that the information stored online may have been accessible without a password. Therefore, Codal began a systematic review of the information at issue to determine to whom it relates. On April 17, 2020, Codal confirmed the identities of the individuals whose information was impacted. Codal then reviewed their files to determine address and contact information for those individuals.

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The information that could have been subject to unauthorized access includes name, address, driver's license, and other government issued identification card.

### **Notice to New Hampshire Residents**

On or about June 16, 2020, Codal provided written notice of this incident to all affected individuals on behalf of RedEx, which includes six (6) 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, Codal moved quickly to investigate and respond to the incident, assess the security of Codal systems, and notify potentially affected individuals. Codal is also working to implement additional safeguards and training to its employees. Codal is providing access to credit monitoring services for one (1) year, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Codal 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. Codal 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) 930-4842.

Very truly yours,



Vincent F. Regan of  
MULLEN COUGHLIN LLC

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# EXHIBIT A



Return Mail Processing  
 PO Box 589  
 Claysburg, PA 16625-0589

June 16, 2020



F5987-L02-0000002 P001 T00001 \*\*\*\*\*MIXED AADC 159  
 SAMPLE A SAMPLE - L02 INDIVIDUAL CONTACT  
 APT 123  
 123 ANY ST  
 ANYTOWN, US 12345-6789



EXTRA1 INFO

Dear Sample A Sample:

RedEx Media LLC (“RedEx”) writes to notify you of an incident that may affect the privacy of some of your personal information. RedEx takes the protection of your information very seriously, and although we have no evidence of actual or attempted misuse of your information potentially affected by this incident, this letter provides details of the incident, our response, and resources available to you to help protect your personal information from possible misuse, should you feel it is appropriate to do so.

**What Happened?** On or about January 24, 2020, RedEx became aware that certain information stored online may have been inadvertently accessible without authorization. Upon discovery, access to the information was immediately disabled, and an investigation was launched which included working with third-party forensic experts to determine the full nature and scope of this incident. On February 27, 2020, it was determined that the information stored online may have been accessible without a password. Therefore, we began a systematic review of the information at issue to determine to whom it relates. On April 17, 2020, we confirmed the identities of the individuals whose information was impacted. We then reviewed our files to determine address and contact information for those individuals. Although we are unaware of any actual or attempted misuse of your personal information, we are providing you this notification out of an abundance of caution because your information was potentially impacted.

**What Information Was Involved?** The information impacted by this incident included your first and last name and the following identifiers: EXTRA2 ITEM1, ITEM2, ITEM3, ITEM4, ITEM5, ETC.

**What Are We Doing?** Information privacy and security are among our highest priorities. We have strict security measures in place to protect information in our care. Upon discovering this incident, we immediately took steps to confirm the security of our systems, including any web storage buckets. In an abundance of caution, we are notifying potentially impacted individuals, including you, so that you may take steps to best protect your information, should you feel it is appropriate to do so. Although we are unaware of any actual or attempted misuse of information as a result of this incident, we arranged to have Experian protect your identity for one (1) year at no cost to you as an added precaution.

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F5987-L02

**What Can You Do?** 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. You may review the information contained in the below “Steps You Can Take to Protect Your Information.” Additionally, to help protect your identity, we are offering a complimentary one-year membership of Experian’s® IdentityWorks<sup>SM</sup>. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: August 31, 2020** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to
- enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code:** [REDACTED]

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian’s customer care team at **(877)890-9332** by **August 31, 2020**. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian. 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.<sup>1</sup>
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE<sup>TM</sup>:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance<sup>2</sup>:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (877)890-9332. 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 (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).

**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 (480)744-6618. We sincerely regret any inconvenience this incident may cause you. Protecting your information is important to us, and RedEx remains committed to safeguarding the information in our care.

Sincerely,

RedEx Media LLC

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<sup>1</sup> Offline members will be eligible to call for additional reports quarterly after enrolling.

<sup>2</sup> 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.

## Steps You Can Take to Protect Your Information

### **Monitor Accounts, Financial, and Medical Billing Statements**

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, medical bills, explanation of benefits (EOBs), and credit reports for suspicious charges or claims. Under U.S. law you are entitled to one (1) free credit report annually from each of the three (3) major credit reporting bureaus. To order your free credit report, visit [www.annualcreditreport.com](http://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**

P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

#### **TransUnion**

P.O. Box 160  
Woodlyn, PA 19094  
1-888-909-8872  
[www.transunion.com/credit-freeze](http://www.transunion.com/credit-freeze)

#### **Equifax**

P.O. Box 105788  
Atlanta, GA 30348-5788  
1-800-685-1111  
[www.equifax.com/personal/credit-report-services](http://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 one (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 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/fraud/center.html](http://www.experian.com/fraud/center.html)

#### **TransUnion**

P.O. Box 2000  
Chester, PA 19106  
1-800-680-7289  
[www.transunion.com/fraud-alerts](http://www.transunion.com/fraud-alerts)

#### **Equifax**

P.O. Box 105069  
Atlanta, GA 30348  
1-888-766-0008  
[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)



### **Additional Information**

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](http://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**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6000, [www.ncdoj.gov](http://www.ncdoj.gov). You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft. **For Maryland residents**, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-410-528-8662, [www.oag.state.md.us](http://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 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](http://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 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/>.