



Liberty Building, 420 Main Street, Suite 1110, Buffalo, New York 14202

3 Columbus Circle, #1500, New York, New York 10019

600 Broadway, Suite 700, San Diego, California 92101

2 Bala Plaza, Suite 300 #704, Bala Cynwyd, Pennsylvania 19004

75 S. Clinton Ave, 510 Clinton Square, Suite 555, Rochester, New York 14604

October 5, 2021

VIA CERTIFIED MAIL

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

RECEIVED

OCT 08 2021

CONSUMER PROTECTION

Dear Sir or Madam:

On behalf of Coghlin Electrical Contractors (“Coghlin”), whose office is located at 100 Prescott Street, Worcester, MA 01605, this letter provides notice of a recent data security incident pursuant to N.H. Rev. Stat. Ann. §359-C:20, involving 53 New Hampshire residents. By providing this notice, Coghlin does not waive any rights or defenses regarding the applicability of New Hampshire law, and the applicability of the New Hampshire data notification laws or personal jurisdiction.

On July 20, 2021, Coghlin became aware that an unauthorized actor gained access to its systems. Upon learning of this, Coghlin immediately began an investigation, changed passwords, alerted law enforcement, retained a leading privacy and security firm, and began working to restore its systems. On August 31, 2021, the investigation concluded that limited information from current and former employees may have been affected by the Incident.

Coghlin has identified 53 New Hampshire residents who may have been affected by the security incident. On September 30, 2021, letters were mailed to potentially affected individuals for whom Coghlin had complete addresses, including the New Hampshire residents. A copy of the letters mailed to potentially affected individuals is attached.

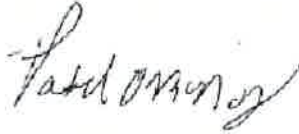
The personal information identified as subject to the incident and affecting New Hampshire residents is limited to name, social security numbers, and addresses. Coghlin has provided the potentially affected individuals, including the New Hampshire residents, with Triple Bureau Credit Monitoring and cyber monitoring services at no charge for twenty-four (24) months from the date of enrollment.

Office of the New Hampshire Attorney General
October 5, 2021
Page 2

Please feel free to contact me with any questions at 716-898-2102 or pmcnally@beckage.com.

Sincerely,

BECKAGE

A handwritten signature in cursive script, appearing to read "Patrick D. McNally".

Patrick D. McNally, Esq.
Certified Information Privacy Professional, United States (CIPP/US)

Encls.



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



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September 27, 2021

Dear [REDACTED]:

We write to advise you that we were recently the victim of a data security incident (the "Incident"). We are writing to let you know how this Incident may have affected your personal information ("Information") and, as a precaution, to provide steps you can take to help protect your Information.

What Happened?

Our investigation determined that on July 19, 2021, an unauthorized actor obtained access to certain files from our systems. On July 20, 2021, we became aware that the unauthorized actor gained access to our systems. Upon learning of this, we immediately began an investigation, changed passwords, alerted law enforcement, retained a leading privacy and security firm, and began working to restore our systems. On August 31, 2021, we were able to conclude that limited Information from 2,040 current and former employees was affected by the Incident.

Our investigation revealed that the Incident involved your Information. However, we are not aware of any fraud or misuse of your Information as a result of this Incident.

What Information Was Involved?

The Information that was potentially obtained from our system, by the unauthorized actor, included social security numbers, a passport identification number, dates of birth, and addresses. Note that this describes general categories of information involved in this Incident, and likely includes categories that are not relevant to you.

Our investigation revealed that the information involved in the Incident included your first and last name, address, and social security number. We have no evidence that your Information was misused but are providing you with this notice.

What We Are Doing?

We immediately reported the Incident to appropriate law enforcement authorities and implemented measures to further improve the security of our systems and practices. We worked with a leading privacy and security firm to aid in our investigation and response.

In addition, while we are unaware of any actual or attempted misuse of your Information as a result of this Incident, we are providing you with access to the following services:

- Representatives, who are available for 90 days from the date of this letter, to assist you with questions regarding this Incident, between the hours of 9:00 am to 9:00 pm Eastern time, Monday through Friday. Please call the help line at 1-866-290-1988.
- Additionally, we are providing you with access to Triple Bureau Credit Monitoring and cyber monitoring services at no charge. These services provide you with alerts, for twenty-four (24) months from the date of enrollment, if changes occur to any of one of your Experian, Equifax, or TransUnion credit files. This notification is sent to you the same day that the change or update takes place with the bureau. Cyber monitoring will look out for your personal data on the dark web and alert you if your personally identifiable Information is found online. In addition, we are providing you with proactive fraud assistance to help with any questions that you might have or in event that you become a victim of fraud.



How Do I Enroll for the Complimentary Credit Monitoring Services?

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online three-bureau credit monitoring service (*myTrueIdentity*) for two years 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 12-letter Activation Code [REDACTED] 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, three-bureau 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 [REDACTED] 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.

You can sign up for the online or offline credit monitoring service anytime between now and **ENROLLMENT DEADLINE**. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion®, Experian® and Equifax®, 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.

Once you are enrolled, you will be able to obtain two years of unlimited access to your TransUnion credit report and credit score. The daily three-bureau credit monitoring service will notify you if there are any critical changes to your credit files at TransUnion, Experian and Equifax, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The subscription also includes access to identity restoration services that provides 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.)

If you have questions about your credit monitoring benefits, 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.

What You Can Do?

Credit monitoring services are available to you at no cost for 24 months. However, it is always recommended that you regularly monitor free credit reports, and review account statements and report any suspicious activity to financial institutions. An "Additional Resources" section is included with this letter, which outlines resources, in addition to the free credit monitoring services, that you can utilize to protect your information.

For More Information.

As described above, if you have any questions about this Incident, please call the help line at 1-866-290-1988, between the hours of 9:00 am to 9:00 pm Eastern time, Monday through Friday, except holidays.

Sincerely,



Cathy Diaz
CFO
Coghlin Electrical Contractors
100 Prescott Street
Worcester, MA 01605

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ADDITIONAL RESOURCES

Contact information for the three nationwide credit reporting agencies:

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111

Experian, PO Box 2104, Allen, TX 75013, www.experian.com, 1-888-397-3742

TransUnion, PO Box 2000, Chester, PA 19022, www.transunion.com, 1-800-888-4213

Free Credit Report. It is recommended that you remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring your credit report for unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting agencies.

To order your annual free credit report please visit www.annualcreditreport.com or call toll free at 1-877-322-8228.

You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's ("FTC") website at www.consumer.ftc.gov) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents: You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

Fraud Alert. You may place a fraud alert in your file by calling one of the three nationwide credit reporting agencies above. A fraud alert tells creditors to follow certain procedures, including contacting you before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit.

Security Freeze. You may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may also submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

The security freeze will prohibit a consumer reporting agency from releasing any information in your credit report without your express authorization or approval. The security freeze is designed to prevent credit, loans and services from being approved in your name without your consent. When you place a security freeze on your credit report, you will be provided with a personal identification number, password or similar device to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report to a specific party or parties or for a specific period of time after the freeze is in place.

To place a security freeze on your credit report, you may be able to use an online process, an automated telephone line, or a written request to any of the three credit reporting agencies listed above. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, and display your name, current mailing address, and the date of issue.

Federal Trade Commission and State Attorneys General Offices. If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your home state. You may also contact these agencies for information on how to prevent or avoid identity theft.

You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, www.ftc.gov/bcp/edu/microsites/idtheft/, 1-877-IDTHEFT (438-4338).

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

North Carolina residents: You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Main Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov, 1-877-566-7266.

Kentucky residents: You may contact the Kentucky Office of the Attorney General, Consumer Protection Division, 1024 Capital Center Drive, Suite 200, Frankfort, Kentucky 40601, www.ag.ky.gov, 1-800-804-7556.

Reporting of identity theft and obtaining a police report.

For Massachusetts residents: You have the right to obtain a police report if you are a victim of identity theft.



For Oregon residents: You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.

For Rhode Island residents: Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident.



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



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To the family of



September 27, 2021

Dear Family of [REDACTED]:

We write to advise you that we were recently the victim of a data security incident (the "Incident"). We are writing to let you know how this Incident may have affected your family member's personal information ("Information") and, as a precaution, to provide steps you can take to help protect your family member's Information.

What Happened?

Our investigation determined that on July 19, 2021, an unauthorized actor obtained access to certain files from our systems. On July 20, 2021, we became aware that the unauthorized actor gained access to our systems. Upon learning of this, we immediately began an investigation, changed passwords, alerted law enforcement, retained a leading privacy and security firm, and began working to restore our systems. On August 31, 2021, we were able to conclude that limited Information from 2,040 current and former employees was affected by the Incident.

Our investigation revealed that the Incident involved your family member's Information. However, we are not aware of any fraud or misuse of your Information as a result of this Incident.

What Information Was Involved?

The Information that was potentially obtained from our system, by the unauthorized actor, included social security numbers, a passport identification number, dates of birth, and addresses. Note that this describes general categories of information involved in this Incident, and likely includes categories that are not relevant to you.

Our investigation revealed that the information involved in the Incident included your family member's first and last name, address, and social security number. We have no evidence that your family member's Information was misused but are providing you with this notice.

What We Are Doing?

We immediately reported the Incident to appropriate law enforcement authorities and implemented measures to further improve the security of our systems and practices. We worked with a leading privacy and security firm to aid in our investigation and response.

In addition, while we are unaware of any actual or attempted misuse of your family member's information as a result of this incident, we are providing you with access to the following services:

- Representatives, who are available for 90 days from the date of this letter, to assist you with questions regarding this Incident, between the hours of 9:00 am to 9:00 pm Eastern time, Monday through Friday. Please call the help line at 1-866-290-1988.
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You can sign up for the online or offline credit monitoring service anytime between now and **ENROLLMENT DEADLINE**. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion®, Experian® and Equifax®, 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.

Once you are enrolled, you will be able to obtain two years of unlimited access to your TransUnion credit report and credit score. The daily three-bureau credit monitoring service will notify you if there are any critical changes to your credit files at TransUnion, Experian and Equifax, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The subscription also includes access to identity restoration services that provides 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.)

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Credit monitoring services are available to you at no cost for 24 months. However, it is always recommended that you regularly monitor free credit reports, and review account statements and report any suspicious activity to financial institutions. An "Additional Resources" section is included with this letter, which outlines resources, in addition to the free credit monitoring services, that you can utilize to protect your family member's information.

For More Information.

As described above, if you have any questions about this Incident, please call the help line at 1-866-290-1988, between the hours of 9:00 am to 9:00 pm Eastern time, Monday through Friday, except holidays.

Sincerely,



Cathy Diaz
CFO
Coghlin Electrical Contractors
100 Prescott Street
Worcester, MA 01605

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To order your annual free credit report please visit www.annualcreditreport.com or call toll free at 1-877-322-8228.

You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U. S. Federal Trade Commission's ("FTC") website at www.consumer.ftc.gov) to: Annual Credit Report Request Service, P. O. Box 105281, Atlanta, GA 30348-5281.

For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents: You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

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To place a security freeze on your credit report, you may be able to use an online process, an automated telephone line, or a written request to any of the three credit reporting agencies listed above. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, and display your name, current mailing address, and the date of issue.

Federal Trade Commission and State Attorneys General Offices. If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your home state. You may also contact these agencies for information on how to prevent or avoid identity theft.

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Kentucky residents: You may contact the Kentucky Office of the Attorney General, Consumer Protection Division, 1024 Capital Center Drive, Suite 200, Frankfort, Kentucky 40601, www.ag.ky.gov, 1-800-804-7556.

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For Oregon residents: You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.

