RECEIVED
AUG 18 2022
CONSUMER PROTECTION

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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

August 15, 2022

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

Dear Sir or Madam:

We represent CPL located at 255 Woodcliff Drive, Suite 200, Fairport, NY 14450, and are writing to notify your office of an event that may affect the security of certain personal information relating to one (1) New Hampshire resident. By providing this notice, CPL 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 June 10, 2022, CPL became aware of suspicious activity affecting certain systems within its network that included the encryption of certain files. Upon discovery, CPL immediately launched an investigation with the assistance of third-party specialists, to confirm the full nature and scope of the activity and to restore functionality to the affected systems. The investigation determined that certain information on CPL systems was accessed without authorization between June 9, 2022, and June 10, 2022. Following this determination, CPL engaged the assistance of third-party specialists to undertake a programmatic and manual review of the information potentially subject to unauthorized access. On July 28, 2022, the review concluded.

The information that could have been subject to unauthorized access includes name and Social Security number.

Notice to New Hampshire Resident

On August 15, 2022 CPL provided written notice of this event to one (1) New Hampshire resident. 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, CPL moved quickly to investigate and respond to the event, assess the security of CPL systems, and identify potentially affected individuals. Further, CPL notified federal law enforcement regarding the event. CPL is also working to implement additional safeguards and training to its employees. CPL is providing access to credit monitoring services for one (1) year through Experian, to individuals whose personal information was potentially affected by this event, at no cost to these individuals.

Additionally, CPL is providing impacted individuals with guidance on how to better protect against identity theft and fraud. CPL 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.

CPL is providing written notice of this event to relevant state and federal 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/rmm
Enclosure

EXHIBIT A

ARCHITECTURE
ENGINEERING
PLANNING
CPLteam.com

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

i2123-L01-0000001 T00001 P001 ********SCH 5-DIGIT 12345
SAMPLE A SAMPLE - L01 INDIVIDUAL
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789

August 15, 2022

[Extra1]

Dear Sample A. Sample:

CPL writes to notify you of a recent event that may affect the security of some of your personal information. We are providing you with information about the event, our response to it, and steps you can take in addition to those you take every day to protect your personal information, should you feel it appropriate to do so.

What Happened? On June 10, 2022, CPL became aware of suspicious activity affecting certain systems within our network that included the encryption of certain files. Upon discovery, we immediately launched an investigation with the assistance of third-party specialists, to confirm the full nature and scope of the activity and to restore functionality to the affected systems. The investigation determined that certain information on CPL systems was accessed without authorization during this event between June 9, 2022 and June 10, 2022. Following this determination, we engaged the assistance of third-party specialists to undertake a programmatic and manual review of the information potentially subject to unauthorized access. On July 28, 2022, this review concluded, and it was determined that the information at issue included your personal information.

What Information Was Involved? The information related to you that may have been accessed includes your name, [Extra2]. Please note that we have no evidence that your personal information was subject to misuse as a result of this event.

What We Are Doing. Safeguarding the privacy of information in our care and the security of our network is among our highest priorities. As part of our ongoing commitment to the security of information within our care, we are reviewing our existing policies and procedures regarding cybersecurity and evaluating additional measures and safeguards to protect against this type of event in the future. We also promptly notified Federal law enforcement of this event.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account and monitoring your free credit reports for suspicious activity. You may also review the information contained in the attached Steps You Can Take to Protect Personal Information. Although we are not aware of any actual or attempted misuse of your personal information, as an added precaution, we have arranged to offer you access to [E months of complimentary credit monitoring and identity restoration services provided through Experian. Although we are making these services available to you, we are unable to enroll you directly. For enrollment instructions, please review the information contained in the attached *Steps You Can Take to Protect Personal Information*.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call at (833) 514-1011, Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays).

Sincerely,

Todd Liebert
Chief Executive Officer
CPL

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

To help protect your identity, we are offering complimentary access to Experian IdentityWorks^{SM} for [E months.

If you believe there was fraudulent use of your information as a result of this incident 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 incident (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 [E 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 [E 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** November 30th, 2022 (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 incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (833) 514-1011 by November 30th, 2022. Be prepared to provide engagement number as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR [E MONTH 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 your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your 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 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 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 your name without your consent. However, you should be aware that using a credit 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 credit freeze on your credit report. To request a security freeze, you will need to provide 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 you are a victim of identity theft.

Should you wish to place a credit freeze, 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
888-298-0045	1-888-397-3742	833-395-6938
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

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may 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 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 District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and oag@dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us. CPL is located at 255 Woodcliff Drive, Suite 200, Perinton, NY 10940.

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 bureaus 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.

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/.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There is 1 Rhode Island resident impacted by this incident.

2022 AUG 18 AM 10: 35
STATE OF NH
DEPT OF JUSTICE