



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

RECEIVED  
OCT 04 2021  
CONSUMER PROTECTION

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

September 27, 2021

**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 Creative Services Inc. ("Creative Services"), located at 64 Pratt Street, Mansfield, Massachusetts, 02048, and write to notify your office of an incident that may affect the privacy of information relating to approximately thirty-eight (38) New Hampshire residents. The investigation into this matter is ongoing, and this notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Creative Services 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.

Creative Services is providing notice on behalf of itself and its affected customers. Creative Services performs background checks on individuals on behalf of potential employers and collects information in furtherance of providing those services.

**Nature of the Data Event**

On August 30, 2021, Creative Services became aware of unusual activity in its email system. Creative Services promptly commenced an investigation and determined that an unauthorized person or persons gained access to certain Creative Services email accounts between August 27 and 30, 2021. While the investigation into this incident is ongoing, it was determined that certain personal information was present in emails obtained by the unauthorized person(s). Creative Services undertook a diligent manual review of the relevant emails to determine what information was present and to identify the individuals whose information may have been impacted. Creative Services completed that process on September 17, 2021 and identified that the incident involved information related to New Hampshire residents. This information includes name, driver's license number, and Social Security number.

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

On or about September 27, 2021, Creative Services began providing written notice of this incident to affected individuals, which includes thirty-eight (38) 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 unusual activity in the email environment, Creative Services moved quickly to assess the security of its systems and commence an investigation into the nature and scope of the event. While this investigation is ongoing, Creative Services is also working to implement additional safeguards and training to its employees. Creative Services is providing access to credit monitoring services for twelve (12) months to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Creative Services is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including 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. Creative Services is also providing written notice of this incident to other state regulators, as appropriate.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4773.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Alex Belton', with a long horizontal line extending to the right.

M. Alexandra Belton of  
MULLEN COUGHLIN LLC

MABB/bo1  
Enclosure

# EXHIBIT A



Return Mail Processing Center  
P.O. Box 6336  
Portland, OR 97228-6336

<<Mail ID>>  
<<Name 1>>  
<<Name 2>>  
<<Address 1>>  
<<Address 2>>  
<<Address 3>>  
<<Address 4>>  
<<Address 5>>  
<<City>><<State>><<Zip>>  
<<Country>>

<<Date>>

**Re: Notice of Data <<Variable Text 1>>**

Dear <<Name1>>:

Creative Services, Inc. (“Creative Services”) conducts background checks for employment and licensing purposes. We take the privacy and protection of the personal information provided to us very seriously. We are writing to inform you of a recent incident that involves some of your personal information. We are providing you with information about this event, our response, and steps you may take to protect against potential misuse of your information, should you feel it appropriate to do so.

**What Happened?** On August 30, 2021, Creative Services became aware of unusual activity in its email system. Creative Services promptly commenced an investigation and determined that an unauthorized person or persons gained access to certain Creative Services email accounts between August 27 and 31, 2021. While our investigation into this incident is ongoing, we are notifying you now because the investigation determined that certain information related to you was present in emails obtained by the unauthorized person(s).

**What Information Was Involved?** We have your information because you had a background check performed on behalf of a potential employer on or around August 2021. Based on the investigation, it was determined that the information involved in this incident may have included your <<Variable Text 2>>, and name.

**What We Are Doing.** We take this incident and the security of your personal information seriously. Upon discovering this incident, we promptly initiated an investigation and took steps to secure our email system. While we have existing safeguards in place, as part of our ongoing commitment to the privacy of personal information in our care, we are working to implement enhanced security measures.

As an added precaution, we are also offering you complimentary access to <<Variable Text 3>> of credit monitoring, fraud consultation, and identity theft restoration services through Equifax. Information on how to enroll in these services is included in the attached *Steps You Can Take to Help Protect Your Personal Information*.

**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 free credit reports for suspicious activity and to detect errors. We also encourage you to review the enclosed *Steps You Can Take to Help Protect Your Personal Information* and to enroll in the complimentary credit monitoring and identity protection services we are offering.

Again, we take the privacy and security of the personal information in our care seriously, and sincerely regret any inconvenience or concern this incident may cause you.

We understand you may have questions that are not addressed in this letter. For more information, please contact our dedicated toll-free assistance line at 855-818-7036, available Monday – Friday from 9:00AM to 9:00PM ET.

Sincerely,

Creative Services, Inc.  
64 Pratt Street  
Mansfield, MA 02048

## Steps You Can Take to Help Protect Your Personal Information

### Enroll in Credit Monitoring

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service provided by Equifax,<sup>®</sup> one of the three nationwide credit reporting companies. To enroll in credit monitoring please follow the instructions below.

Go to [www.equifax.com/activate](http://www.equifax.com/activate)

Enter your unique Activation Code of <<Activation Code>> then click "Submit" and follow these 4 steps:

1. **Register:** Complete the form with your contact information and click "Continue".  
*If you already have a myEquifax account, click the 'Sign in here' link under the "Let's get started" header.  
Once you have successfully signed in, you will skip to the Checkout Page in Step 4*
2. **Create Account:** Enter your email address, create a password, and accept the terms of use.
3. **Verify Identity:** To enroll in your product, we will ask you to complete our identity verification process.
4. **Checkout:** Upon successful verification of your identity, you will see the Checkout Page.  
Click 'Sign Me Up' to finish enrolling.

#### **You're done!**

The confirmation page shows your completed enrollment.  
Click "View My Product" to access the product features.

You can sign up for these services anytime between now and <<Enrollment Deadline>>. You will need to activate these services yourself, as we are not able to do so on your behalf.

### 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](http://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:

| <b>Equifax</b>  | <b>Experian</b>   | <b>TransUnion</b>   |
|---|---|---|
| <a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a> | <a href="https://www.experian.com/help/">https://www.experian.com/help/</a> | <a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a> |
| 1-888-298-0045  | 1-888-397-3742  | 1-833-395-6938  |
| Equifax Fraud Alert, P.O. Box 105069<br>Atlanta, GA 30348-5069  | Experian Fraud Alert, P.O. Box 9554,<br>Allen, TX 75013                     | TransUnion Fraud Alert, P.O. Box<br>2000, Chester, PA 19016                                 |
| Equifax Credit Freeze, P.O. Box 105788<br>Atlanta, GA 30348-5788  | Experian Credit Freeze, P.O. Box<br>9554, Allen, TX 75013                   | TransUnion Credit Freeze, P.O. Box<br>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](http://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 St. NW Washington, D.C. 20001; 202-727-3400; and [oag@dc.gov](mailto: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](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 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](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 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](http://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](http://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 are **[#]** Rhode Island residents impacted by this incident.