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COUGHLIN LLP
ATTORNEYS AT LAW

RECEIVED
OCT 20 2020
CONSULTATION

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October 22, 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 Customer Portfolios, LLC (“Customer Portfolios”) located at 88 Black Falcon Avenue, Suite 320 Boston, Massachusetts 02210 and are writing to notify your office of an incident that may affect the security of some personal information relating to one (1) New Hampshire resident. 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, Customer Portfolios 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 July 7, 2020, Customer Portfolios determined that an unknown third party potentially accessed the contents of an employee’s mailbox. Upon first seeing indications of unauthorized access to the mailbox, Customer Portfolios immediately terminated any unauthorized access and promptly engaged independent computer experts to investigate the scope of the incident. The investigation was comprehensive and took time to determine the scope of the incident and the type of information that was impacted. On September 11, 2020, the investigation concluded that personal information of one New Hampshire resident was contained in an employee’s mailbox that may have been accessed by an unknown, unauthorized third party. At this time, Customer Portfolios has discovered no evidence to suggest that anyone’s personal information is being misused in connection with this incident.

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The information that could have been subject to unauthorized access includes the New Hampshire resident's name and Social Security number.

Notice to New Hampshire Residents

On or about October 22, 2020, Customer Portfolios provided written notice of this incident to all affected individuals, which includes 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, Customer Portfolios moved quickly to investigate and respond to the incident, assess the security of Customer Portfolios systems and email accounts, and notify potentially affected individuals. Customer Portfolios is also working to implement additional safeguards and training to its employees. Customer Portfolios is providing access to credit monitoring services for two (2) years through TransUnion Interactive to individuals whose personal information was potentially affected by this incident, at no cost to the individuals.

Additionally, Customer Portfolios 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. Customer Portfolios 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) 930-1697.

Very truly yours,

A handwritten signature in black ink, appearing to read "Amanda Harvey". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Amanda Harvey of
MULLEN COUGHLIN LLC

Exhibit A



October 22, 2020

[Name]
[Street Address]
[City, State, Zip Code]

Dear [Recipient Name]:

Customer Portfolios writes to inform you of a recent incident that may affect your name and Social Security number. While we are unaware of any actual or attempted misuse of your information, we are providing you with information about the incident, our response, and steps you may take to better protect yourself, should you feel it necessary to do so.

What Happened? On July 7, 2020, Customer Portfolios determined that your personal information may have been viewed in connection with an unknown third party's unauthorized access to an employee's mailbox. Upon first seeing indications of unauthorized access to the mailbox, we immediately terminated any unauthorized access and promptly engaged independent computer experts to investigate the scope of the incident. The investigation was comprehensive and took time to determine the scope of the incident and the type of information that was impacted.

What Information Was Involved? Although we have discovered no evidence to suggest that your information is being misused, we determined the mailbox contained information relating to you, including your name and Social Security number. Out of an abundance of caution, we are notifying you of this event and offering you resources to help you protect your information.

What Are We Doing? We take this matter and the security of your personal information very seriously. Out of an abundance of caution, we have reset old passwords and changed email access procedures. As part of our ongoing commitment to the security of personal information in our care, we are also reviewing our existing policies and procedures and implementing additional safeguards to enhance the security of information in our possession.

As an added precaution, we arranged for you to enroll, at no cost to you, in an online credit monitoring service (myTrueIdentity) for two years provided by TransUnion Interactive, a subsidiary of TransUnion,[®] one of the three nationwide credit reporting companies. We encourage you to enroll in these services, as we are not able to act on your behalf to enroll you. Please review the instructions contained in the attached *Steps You Can Take to Help Protect Your Information* for additional information on these services.

What Can You Do? We encourage you to review the enclosed *Steps You Can Take To Help Protect Your Information* for additional steps you may take and information on what you can do to better protect against the possibility of identity theft and fraud, should you feel it is appropriate to do so. You may also enroll to receive the free credit and identity monitoring services we are offering.



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 us at (617) 224-9501, extension 105. You may also write to Customer Portfolios at 88 Black Falcon Avenue, Suite 320, Boston, Massachusetts 02210.

We sincerely regret any inconvenience or concern this incident has caused.

Sincerely,

Augie MacCurrach
Chief Executive Officer
Customer Portfolios



STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

Enroll in Credit and Identity Monitoring

As an added precaution, we arranged for you to enroll, at no cost to you, in an online 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 to the *myTrueIdentity* website at **www.MyTrueIdentity.com** and, in the space referenced as "Enter Activation Code," enter the 12-letter Activation Code <<Insert Unique 12-letter Activation Code>> 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 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 six-digit telephone passcode <<Insert static six-digit Telephone Pass Code>> 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 **January 31, 2021**. 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 or an address in the United States (or its territories) and a valid Social Security number. 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 credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, changes of address, and more. The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

Monitor Accounts

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. 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.

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

TransUnion
P.O. Box 160
Woodlyn, PA 19094

Equifax
P.O. Box 105788
Atlanta, GA 30348-5788

1-888-397-3742
www.experian.com/freeze/center.html

1-888-909-8872
www.transunion.com/credit-freeze

1-800-685-1111
www.equifax.com/personal/credit-report-services

In order to request a security freeze, you will need to provide the following information:

- Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
- Social Security number;
- Date of birth;
- If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
- Proof of current address, such as a current utility bill or telephone bill;
- A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, etc.);
- 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 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

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-680-7289
www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
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, 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. **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; <https://ag.ny.gov/>.