



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

RECEIVED

MAR 22 2021

CONSUMER PROTECTION

Lynda Jensen  
Office: (267) 930-2303  
Fax: (267) 930-4771  
Email: Ljensen@mullen.law

430 Franklin Village Dr, #184  
Franklin, MA 02038

March 17, 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 Cygilant, Inc. ("Cygilant") located at 2400 District Avenue, Suite 320 Burlington, MA 01803, and are writing to notify your office of an incident that may affect the security of some personal information relating to thirty-four (34) 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, Cygilant 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 On August 25, 2020, Cygilant, Inc. ("Cygilant") observed unusual activity in its internal system. Upon discovering this activity, Cygilant began an investigation, including working with third-party forensic specialists, to identify the source of the activity and determine its impact on Cygilant systems. The investigation determined that unauthorized access to portions of our internal system occurred on August 25, 2020 and that certain files might have been accessible to someone unauthorized to view them. Cygilant began a review of these files to learn what information they contained at the time of this incident. On November 17, 2020, Cygilant determined that the accessible files contain certain personal information. Cygilant then undertook a second review to identify relevant addresses for impacted individuals in order to provide notification to the same. This review completed on February 16, 2021. We have no evidence that any personal information actually was accessed or acquired as a result of this incident.

Mullen.law

The information that could have been subject to unauthorized access includes name, address, Social Security number, financial account information, and driver's license information.

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

On or about March 17, 2021, Cygilant provided written notice of this incident to all affected individuals, which includes thirty-four (34) 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, Cygilant moved quickly to investigate and respond to the incident, assess the security of Cygilant systems, and notify potentially affected individuals. Cygilant is also working to implement additional safeguards and training to its employees. Cygilant is providing access to credit monitoring services for twenty-four (24) months, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Cygilant 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. Cygilant 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) 930-2303.

Very truly yours,



Lynda Jensen of  
MULLEN COUGHLIN LLC

# EXHIBIT A



**CYGILANT.**

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

March 17, 2021



G3165-L01-0000001 T00001 P001 \*\*\*\*\*AUTO\*\*MIXED AADC 159  
SAMPLE A. SAMPLE - L01  
APT ABC  
123 ANY ST  
ANYTOWN, ST 12345-6789



Dear Sample A. Sample:

We are writing to notify you of a recent incident that may have impacted the privacy of certain information related to you. We want to provide you with information about the incident, our response and steps you can take to better protect your information, should you feel it necessary to do so.

**What Happened.** On August 25, 2020, Cygilant, Inc. (“Cygilant”) observed unusual activity in its internal system. Upon discovering this activity, Cygilant began an investigation, including working with third-party forensic specialists, to identify the source of the activity and determine its impact on Cygilant systems. The investigation determined that unauthorized access to portions of our internal system occurred on August 25, 2020 and that certain files might have been accessible to someone unauthorized to view them. Cygilant began a review of these files to learn what information they contained at the time of this incident. On November 17, 2020, Cygilant determined that the accessible files contain certain information related to you. We have no evidence that any of your information actually was accessed or acquired as a result of this incident.

**What Information Was Involved?** A review of the files in the impacted system determined that the following information related to you may have been accessible: [EXTRA1].

**What We Are Doing.** The confidentiality, privacy, and security of personal information within our custody is among Cygilant’s highest priorities. Upon learning of the activity, we launched an investigation, as noted above, with our forensic specialists to determine what systems and information may have been impacted by this incident. We also took steps to further secure our network and determine who may be impacted by this incident. Although we have no evidence of any misuse of your information, as an added precaution, we have arranged for you to have access to 24 months of credit monitoring services through Experian, at no cost to you.

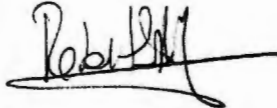


**What You Can Do.** Please review the enclosed *Steps You Can Take to Protect Personal Information*, which contains information on what you can do to better protect against possible misuse of your information. You can also find information there on how to enroll in the monitoring service that is being offered.

**For More Information.** We understand you may have questions that are not answered in this letter. If you have any questions, please call our dedicated hotline at (888) 884-0180, Monday through Friday, 6:00 a.m. to 8:00 p.m. PST and Saturday/Sunday, 8:00 a.m. to 5:00 p.m. PST, excluding national holidays.

We apologize for any inconvenience this notice may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Scott", with a horizontal line extending to the right from the end of the signature.

Robert Scott  
Chief Executive Officer  
Cygilant, Inc.

## Steps You Can Take to Protect Personal Information

### Enroll in the Complimentary Credit Monitoring and Identity Protection Services

To help protect your identity, we are offering a complimentary two-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: May 31, 2021** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code: ABCDEFGHI**

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 (888) 884-0180 by **May 31, 2021**. Be prepared to provide engagement number **B010499** as proof of eligibility for the identity restoration services by Experian.

### **Additional details regarding your 24-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 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>\*\*</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 855-493-7267. 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).

Please note that this Identity Restoration support is available to you for two years 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](http://www.ExperianIDWorks.com/restoration). You will also find self-help tips and information about identity protection at this site.

\* 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 Accounts**

In general, 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](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:

### **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)

### **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)

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 years, 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, 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-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:

### **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**

### **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

<https://www.transunion.com/fraud-alerts>

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; <https://www.consumer.ftc.gov/features/feature-0014-identity-theft>; 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.

**Maryland Residents:** Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202, [www.oag.state.md.us/Consumer](http://www.oag.state.md.us/Consumer), Telephone: 1-888-743-0023.

**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/>.

**North Carolina Residents:** Office of the Attorney General of North Carolina, Consumer Protection Division, 9001 Mail Service Center Raleigh, NC 27699-9001, [www.ncdoj.gov](http://www.ncdoj.gov), Telephone: 1-919-716-6400, 877-566-7226 (toll free within NC).

0000001



G3165-L01