



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

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CONSUMER PROTECTION

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

October 28, 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 The Dolben Company, Inc. ("Dolben") located at 150 Presidential Way, Suite 220, Woburn, Massachusetts, 01801, and are writing to notify your office of an incident that may affect the security of some personal information relating to approximately one hundred fifty-two (152) New Hampshire residents. By providing this notice, Dolben 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 April 6, 2021, Dolben became aware of suspicious activity relating to its computer systems and promptly launched an investigation, with the assistance of third-party specialists, to determine the nature and scope of the activity. Dolben also reported the event to federal law enforcement. Through the investigation, Dolben determined that an unknown actor gained access to certain systems between April 3, 2021 and April 6, 2021, and viewed or removed certain data from the network.

Dolben then conducted a comprehensive review of information stored on the impacted systems in order to determine what information was affected and to whom the information related. Upon completion of the review, Dolben then conducted a manual review of its records to confirm the identities of individuals affected by this event and their contact information to provide notifications. On or around October 20, 2021, Dolben completed its review.

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The information that could have been subject to unauthorized access for New Hampshire residents includes name, Social Security number, and financial account information.

Notice to New Hampshire Residents

On or about October 28, 2021, Dolben provided written notice of this incident to all affected individuals, which includes approximately one hundred fifty-two (152) 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, Dolben moved quickly to investigate and respond, assess the security of its systems, and notify potentially affected individuals. Dolben is also working to implement additional safeguards and training to its employees.

Additionally, Dolben 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. Dolben is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against 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. Dolben is also notifying other appropriate state regulators.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4802.

Very truly yours,

A handwritten signature in dark ink, appearing to be 'SS' or 'Sica', written in a cursive style.

Samuel Sica, III of
MULLEN COUGHLIN LLC

SZS/jls

EXHIBIT A

DOLBEN 10300 SW Greenburg Rd.
Suite 570
Portland, OR 97223

<<First Name>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip>>

October 28, 2021

Dear <<First Name>> <<Last Name>>,

The Dolben Company Inc. ("Dolben") is providing notice of a recent event that may affect the security of some of your information. Although we have no indication that your information has been fraudulently misused in relation to this event, we are providing you with information about the event, our response, and additional measures you can take to protect your information, should you feel it appropriate to do so.

What Happened? On April 6, 2021, we became aware of suspicious activity relating to our computer systems and promptly launched an investigation to determine the nature and scope of the activity. We also reported the event to federal law enforcement. Through our investigation, we determined that an unknown actor gained access to certain systems between April 3, 2021 and April 6, 2021, and viewed or removed certain data from the network.

We then conducted a comprehensive review of information stored on the impacted systems in order to determine what information was affected and to whom the information related. Upon completion of our review, we then conducted a manual review of our records to confirm the identities of individuals affected by this event and their contact information to provide notifications. We recently completed our review.

What Information Was Involved? Our investigation determined that the following types of information related to you were present on the server at the time of the event: name and <<DATA ELEMENT>>.

What We Are Doing. We take this event and the security of information in our care seriously. Upon discovering this event, we promptly took steps to investigate and respond, assess the security of our systems, and notify potentially affected individuals. In response to this event, we reviewed and enhanced existing policies and procedures. We are also notifying potentially impacted individuals so that they may take further steps to protect their information should they feel it appropriate to do so.

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. Please also review the enclosed "*Steps You Can Take to Help Protect Your Personal Information*," which contains information on what you can do to safeguard against possible misuse of your information.

For More Information. If you have additional questions, please call our toll-free assistance line at 1-833-903-3648 Monday through Friday (excluding U.S. holidays) from 9:00 AM to 9:00 PM Eastern Time. You may also write to Dolben at 150 Presidential Way, Suite 220, Woburn, Massachusetts, 01801.

Sincerely,

A handwritten signature in dark ink, appearing to read "Erifile Georgiou". The signature is fluid and cursive, with the first name "Erifile" and last name "Georgiou" clearly distinguishable.

Erifile Georgiou
Chief Financial Officer
The Dolben Company Inc.

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

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 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 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 fraud alert or 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
1-888-298-0045	1-888-397-3742	1-833-395-6938
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.

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 are 76 Rhode Island residents impacted by this incident.