



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

MAR 10 2020

CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302
Wayne, PA 19087

March 6, 2020

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 Doyle Wealth Management, Inc. (“Doyle Wealth”) located at 333 Third Avenue North, Suite 300, St. Petersburg, FL 33701, and are writing to notify your office of an incident that may affect the security of some personal information relating to five (5) 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, Doyle Wealth 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 Monday, June 10, 2019, Doyle Wealth identified suspicious activity in an employee’s email account. Doyle Wealth immediately changed the employee’s email credentials and began an investigation into the incident. As part of the investigation, which was conducted with the assistance of third-party forensic specialists, it was determined that the employee’s email account was subject to unauthorized access between Saturday, June 8, 2019, and Monday, June 10, 2019, and was used to access the email accounts of certain other employees. While our investigation was able to confirm access to the accounts, the investigation was unable to rule out access to any emails or attachments within the accounts. As a result, with the assistance of third-party forensics, we began an extensive review of the email accounts to determine whether they contained any protected information and to whom the information relates.

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The forensic expert completed its time-consuming analysis of the contents of the email accounts and prepared a list of potentially impacted individuals whose information was determined to be present in the emails or attachments possibly viewed by the unauthorized person. The list of potentially impacted individuals was missing address information for a large percentage of the population and notification was unable to be provided without this address information. Doyle Wealth then undertook a laborious review of its internal records to locate the addresses for the affected individuals. This process was completed on February 17, 2020 and Doyle Wealth moved quickly to provide notification once address information was identified. The information that could have been subject to unauthorized access includes: name, address, date of birth, Social Security number, financial account number and financial institution routing number. Doyle Wealth has no evidence that any information has been subject to actual or attempted misuse.

Notice to New Hampshire Residents

On or about March 6, 2020, Doyle Wealth provided written notice of this incident to affected individuals, which includes five (5) 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, Doyle Wealth moved quickly to investigate and respond to the incident, assess the security of Doyle Wealth systems, and notify potentially affected individuals. Doyle Wealth immediately changed passwords for the impacted accounts and implemented additional security safeguards such as two factor authentication and increased employee training. Doyle Wealth is also providing individuals whose personal information was potentially affected by this incident with access to one year of credit monitoring services for through MyIDCare™ at no cost to these individuals.


Doyle Wealth 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. Doyle Wealth is also 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. Additionally, Doyle Wealth is notifying any regulator as required.

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Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4784.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'J. Boogay', with a long horizontal flourish extending to the right.

Jeffrey J. Boogay of
MULLEN COUGHLIN LLC

JJB:ncl
Enclosure

EXHIBIT A

Doyle Wealth Management, Inc.

C/O ID Experts
PO Box 4219
Everett WA 98204

To Enroll, Please Call:

1-833-570-0377

Or Visit:

<https://ide.myidcare.com/doylewealth>

Enrollment Code: <<XXXXXXXX>>

ENDORSE



NAME

ADDRESS1

ADDRESS2

CSZ

COUNTRY



SEQ
CODE 2D
Ver 1GE

BREAK

March 6, 2020

RE: Notice of Data Breach

Dear <<First Name>> <<Last Name>>:

Doyle Wealth Management, Inc. ("Doyle Wealth") is writing to notify you of a recent incident that may impact some of your personal information. Doyle Wealth is advising you of our investigation and the steps we have taken in response to this incident. While we have no reports of any data being misused as a result of this incident, we are providing you with steps you can take to protect your personal information should you feel it is appropriate to do so.

What Happened? On or about Monday, June 10, 2019, Doyle Wealth identified suspicious activity in an employee's email account. Doyle Wealth immediately changed the employee's email credentials and began an investigation into the incident. As part of the investigation, which was conducted with the assistance of a third-party forensic expert, it was determined that the employee's email account was subject to unauthorized access between Saturday, June 8, 2019, and Monday, June 10, 2019, and was used to access the email accounts of certain other employees. While our investigation was able to confirm access to the email accounts, the investigation was unable to rule out access to any emails or attachments. As a result, with the assistance of third-party forensics, we began an extensive review of the email accounts to determine whether they contained any protected information and to whom the information relates.

The forensic expert completed its time-consuming analysis of the contents of the email accounts and prepared a list of potentially impacted individuals whose information was determined to be present in the emails or attachments possibly viewed by the unauthorized person. Doyle Wealth then searched its internal records to locate the addresses for the affected individuals.

Does this Mean I am a Victim of Identity Theft? No, this does not mean you are a victim of identity theft. You are being notified because your personal information may have been subject to unauthorized access. Doyle Wealth previously notified anyone whose personal information was contained in an email that was forwarded to an unauthorized email address. However, as always, we encourage you to remain vigilant against incidents of identity theft, to review your account statements, and to monitor your credit reports for suspicious activity.

What Information Was Involved? The information in the email accounts that was potentially subject to unauthorized access includes your: <<Variable Data 1>>. To date, we have not received any reports of actual or attempted misuse of your information.

What We Are Doing. Doyle Wealth takes the security of personal information in its care very seriously. Doyle Wealth immediately changed passwords for the impacted accounts and implemented additional security safeguards such as two factor authentication and increased employee training.

As an added precaution, Doyle Wealth is also offering you access to 12 months of complimentary credit monitoring and identity protection services through ID Experts. The cost of this service will be paid for by Doyle Wealth. Instructions on how to enroll

in the credit monitoring and identity protection services can be found in the enclosed *Steps You Can Take to Protect Against Identity Theft and Fraud*.

What You Can Do. You can enroll to receive the free credit monitoring and identity restoration services being provided by Doyle Wealth. You can also review the enclosed *Steps You Can Take to Protect Against Identity Theft and Fraud*.

For More Information. We understand that you may have questions about this incident that may not be addressed in this letter. If you have additional questions, or need assistance, please call 1-833-570-0377, Monday through Friday, from 9:00 am to 9:00 pm Eastern Time or go to <https://ide.myidcare.com/doylewealth>.

We sincerely apologize for this incident and regret any concern or inconvenience this may have caused you.

Sincerely,

Doyle Wealth Management, Inc.

Steps You Can Take to Protect Against Identity Theft and Fraud

We encourage you to contact ID Experts with any questions and to enroll in free MyIDCare services by calling 1-833-570-0377 or going to <https://ide.myidcare.com/doylewealth> and using the Enrollment Code provided above. MyIDCare experts are available Monday through Friday from 9 am - 9 pm Eastern Time. Please note the deadline to enroll is June 6, 2020.

1. Website and Enrollment. Go to <https://ide.myidcare.com/doylewealth> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.

2. Activate the credit monitoring provided as part of your MyIDCare membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, MyIDCare will be able to assist you.

3. Telephone. Contact MyIDCare at 1-833-570-0377 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

Monitor Your Accounts. Doyle Wealth reminds you to always remain vigilant against incidents of identity theft, to review your account statements, and to monitor your credit reports and explanation of benefits forms 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:

TransUnion
P.O. Box 2000
Chester, PA 19106
1-800-680-7289
www.transunion.com/fraud-victim-resource/place-fraud-alert

Experian
P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/center.html

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
www.equifax.com/personal/credit-report-services

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 (5) years, provide 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, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft;

The credit reporting agencies have one (1) to three (3) business days after receiving your request to place a security freeze on your credit file report, based upon the method of the request. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with the process by which you may remove the security freeze, including an authentication mechanism. Upon receiving a direct request from you to remove a security freeze and upon receiving proper identification from you, the consumer reporting agency shall remove a security freeze within one (1) hour after

receiving the request by telephone for removal or within three (3) business days after receiving the request by mail for removal.

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:

TransUnion
P.O. Box 2000
Chester, PA 19106
1-800-680-7289
www.transunion.com/fraud-victim-resource/place-fraud-alert

Experian
P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/center.html

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
www.equifax.com/personal/credit-report-services

You can also 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, your state Attorney General, or the Federal Trade Commission (FTC). The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (877-438-4338); and TTY: 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 also obtain further information on how to file such a complaint by way of the contact information listed above. Instances of known or suspected identity theft should be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-410-528-8662, 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 agencies 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_cfbp_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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6000, www.ncdoj.gov. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

For Rhode Island Residents, the Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903; www.riag.ri.gov, 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 eight Rhode Island residents impacted by this incident.

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/>.