



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

MAY 07 2020

CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302
Wayne, PA 19087

May 4, 2020

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 Environmental Data Resources L.L.C. (“EDR”) located at 6 Armstrong Road, 4th Floor, Shelton, CT 06484 and are writing to notify your office of an incident that may affect the security of some personal information relating to nine (9) 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, EDR 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 September 21, 2019, EDR discovered suspicious activity relating to its corporate email system. EDR immediately isolated and shut down the identified email account and began an investigation with assistance from outside cyber-forensics specialists to determine the nature and scope of the incident. The investigation determined that email accounts were subject to unauthorized access between August 8, 2019 and November 21, 2019. While the investigation was able to confirm access to the email system, the investigation was unable to definitively verify the accessing or forwarding of any emails or attachments. As a result, with the assistance of third-party forensics, EDR began an extensive review of the email system to determine whether it contained any protected information and to whom the information relates.

The forensic experts completed an exhaustive analysis of the contents of the compromised accounts on March 2, 2020 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. EDR then searched its internal records to locate the addresses for the potentially affected individuals. This review concluded on April 10, 2020.

Although the types of personal information at risk may vary by individual, the following types of personal information was potentially impacted for New Hampshire residents: name, Social Security number, and financial account number.

Notice to New Hampshire Residents

On May 4, 2020, EDR began mailing written notice of this incident to potentially affected individuals, which includes approximately nine (9) New Hampshire residents in substantially the same form as the letter attached hereto as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, EDR moved quickly to investigate and respond to the incident, assess the security of EDR systems, and notify potentially affected individuals. EDR is also working to implement additional safeguards and training to its employees. EDR is providing access to credit monitoring services for twelve (12) months, through Kroll, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, EDR is 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. EDR also established a dedicated assistance line for individuals to contact should they have additional questions about this incident.

In addition to providing notice to your office, EDR is providing notice to other state regulators and consumer reporting agencies, as required by law.

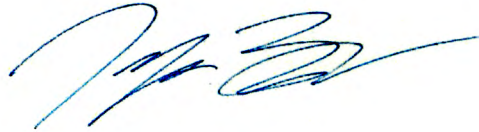
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DEPT OF JUSTICE
STATE OF NH

Office of the New Hampshire Attorney General
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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/MLL/mep

EXHIBIT A



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country >>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

Environmental Data Resources, LLC ("EDR") is writing to inform you of a recent incident that may impact the privacy of some of your personal information. We wanted to provide you with information about the incident, our response, and steps you may take to better safeguard against the possibility of identity theft and fraud, should you feel it necessary.

What Happened? On September 21, 2019, EDR discovered suspicious activity relating to their corporate email system. EDR immediately isolated and shut down the identified system and began an investigation with assistance from outside cyber-forensic specialists to determine the nature and scope of the incident. The investigation determined that unauthorized access to the system occurred between August 8, 2019 and November 21, 2019; however, the forensic investigation was unable to determine access to specific emails and/or attachments. EDR in an abundance of caution and with the assistance of third-party forensics, began an extensive review of the email accounts to determine whether they contained any protected information and if so, to whom the information relates. In conjunction, EDR searched its internal records to locate the addresses for the affected individuals. This review concluded on April 10, 2020.

What Information Was Involved? The following types of personal information were found within the impacted email accounts: your <<b2b_text_1 (Impacted Data)>>. To date, we have no indication that any personal information has been subject to actual or attempted misuse in relation to this incident.

What We Are Doing. We take this incident and the security of personal information within our care very seriously. Upon discovery of this incident, we immediately took steps to secure the email accounts and launched an in-depth investigation with the assistance of outside computer forensics specialists to determine the full nature and scope of this incident. As part of our ongoing commitment to the privacy of personal information in our care, we reviewed our existing policies and procedures and implemented additional safeguards to further secure the information in our systems. We are also notifying regulatory authorities, as required by law.

As an added precaution, we are also offering twelve (12) months of complimentary access to identity monitoring services through Kroll. These services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration. Individuals who wish to receive these services must activate by following the attached activation instructions.

What You Can Do. You can find out more about how to help safeguard against potential identity theft and fraud in the enclosed *Steps You Can Take to Help Protect Your Personal Information*. There you will also find more information on the identity monitoring services we are offering and how to activate.

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 the dedicated assistance line that we have helped set-up at 1-???-???-????, Monday through Friday from 8:00 a.m. to 5:30 p.m., Central Time, excluding U.S. holidays.

EDR sincerely regrets any inconvenience or concern this incident may have caused you.

Sincerely,

Environmental Data Resources, LLC

Steps You Can Take to Help Protect Your Personal Information

Activate Your Identity Monitoring

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit [https://\[IDMonitoringURL\]](https://[IDMonitoringURL]) to activate and take advantage of your identity monitoring services.

You have until **[Date]** to activate your identity monitoring services.

Membership Number: <<Member ID>>

Additional information describing your services is included with this letter.

Monitor Your 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

1-888-397-3742

www.experian.com/freeze/center.html

TransUnion

P.O. Box 160

Woodlyn, PA 19094

1-888-909-8872

www.transunion.com/credit-freeze

Equifax

P.O. Box 105788

Atlanta, GA 30348-5788

1-800-685-1111

www.equifax.com/personal/credit-report-services

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.

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:

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