



**MULLEN  
COUGHLIN** LLC **CONSUMER PROTECTION**  
ATTORNEYS AT LAW

**RECEIVED**

**APR 06 2020**

Alexander T. Walker  
Office: (267) 930-4801  
Fax: (267) 930-4771  
Email: [awalker@mullen.law](mailto:awalker@mullen.law)

1275 Drummers Lane, Suite 302  
Wayne, PA 19087

April 1, 2020

**INTENDED FOR ADDRESSEE(S) ONLY**

**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 FC Compassus, LLC (“Compassus”) located at 10 Cadillac Drive, Brentwood, Tennessee 37027 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. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Compassus 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 January 16, 2020, Compassus learned of suspicious activity related to a limited number of staff email accounts. Compassus immediately began working with outside computer forensics specialists to investigate the nature and scope of the incident. On February 4, 2020, the investigation determined that an unauthorized actor gained access to two (2) employees’ email accounts on January 17, 2020. Because the investigation could not rule out that email messages or file attachments in the impacted email accounts were viewed by the unauthorized actor, in an abundance of caution, Compassus undertook a lengthy and thorough review of the impacted email accounts’ contents to determine whether they contained any sensitive personal information that may be at risk for unauthorized access. On March 16, 2020, after a thorough review process, the investigation confirmed the population of the potentially impacted individuals. Although the types of personal information potentially subject to unauthorized access vary by individual, the types involved for the New Hampshire resident include: name, address, and Social Security number.

### **Notice to New Hampshire Resident**

On or about April 1, 2020, Compassus began mailing 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, Compassus moved quickly to investigate and respond to the incident, assess the security of Compassus systems, and notify potentially affected individuals. Steps taken by Compassus include a company-wide reset of email account passwords, implementation of multifactor authentication requirements for email account login company-wide, and reviewing and enhancing existing policies and procedures to protect against similar events in the future. Further, Compassus 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, Compassus 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. Compassus 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) 930-4801.

Very truly yours,



Alexander T. Walker of  
MULLEN COUGHLIN LLC

ATW/smm

# EXHIBIT A



10 Cadillac Drive, Suite 400  
Brentwood, TN 37027  
615-377-7022  
compassus.com

April 1, 2020

**RE: Notice of Data Breach**

Dear \_\_\_\_\_ :

FC Compassus, LLC (“Compassus”) is writing to inform you of an incident that may affect the security of your personal information. Although at this time we have no indication of actual or attempted misuse of personal information in relation to this incident, we take this incident very seriously and are providing you with details of the incident and the resources to help protect your information from possible misuse, should you feel it is appropriate to do so.

***What Happened?*** On January 16, 2020, Compassus learned of suspicious activity related to a limited number of staff email accounts. We immediately began working with outside computer forensics specialists to investigate the nature and scope of the incident. On February 4, 2020, our investigation determined that an unauthorized actor gained access to two (2) employees’ email accounts containing sensitive information on January 17, 2020.

Because our investigation could not rule out that email messages or file attachments in the impacted email accounts were viewed by the unauthorized actor, in an abundance of caution we undertook a lengthy and thorough review of the impacted email accounts’ contents to determine whether they contained any sensitive personal information that may be at risk for unauthorized access. On March 16, 2020, we confirmed all potentially impacted individuals. Although we are not aware at this time of any actual or attempted misuse of personal information in relation to this incident, we are providing you this notification in an abundance of caution.

***What Information Was Affected?*** Our investigation determined the following types of your personal information were stored in an impacted email account and therefore may have been subject to unauthorized access: \_\_\_\_\_ . To date, we are unaware of any actual or attempted misuse of personal information in relation to this incident.

***What We Are Doing.*** We take this incident and the security of personal information in our care seriously. In addition to our actions detailed above, our response to this incident included a company-wide reset of email account passwords, implementing a multifactor authentication requirement for email account login company-wide, and reviewing and enhancing existing policies and procedures to protect against similar events in the future. Compass is also notifying the US Department of Health and Humans Services and certain state regulators, as required.



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Brentwood, TN 37027  
615-377-7022  
compassus.com

As an additional precaution, we are offering you access to complimentary identity monitoring services for twelve (12) months through Kroll. These services include credit monitoring, fraud consultation, and identity theft restoration services. If you wish to activate the identity monitoring services, you may follow the instructions included in the *Steps You Can Take to Help Protect Your Information*.

***What Can You Do?*** We encourage you to review the information in the attached “*Steps You Can Take to Help Protect Your Information*.” There you will also find more information on the identity monitoring services we are making available to you. We encourage you to enroll in these credit monitoring and identity theft restoration services that we are offering, as we are not able to act on your behalf to do so.

***For More Information:*** We recognize that you may have questions not addressed in this letter. If you have additional questions, please contact Carrie Uebel at 615-309-5684 between the hours of 9:00 am and 5:00 pm Central Time.

We sincerely regret any inconvenience this incident may cause you. We remain committed to safeguarding the information in our care and we will continue to take steps to ensure the security of our systems.

Sincerely,

Russ Adkins  
Senior Vice President & General Counsel  
FC Compassus LLC



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615-377-7022  
compassus.com

## STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

### Enroll/Activate in Credit Monitoring

As an added precaution, and at no cost to you, we arranged to have Kroll provide identity monitoring for 12 months. 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. It is incumbent upon you to activate in these services, as we are not able to act on your behalf to enroll you in the credit monitoring service. To activate your membership and start monitoring your personal information, please follow the steps below:

- Visit <https://enroll.idheadquarters.com/redeem> to activate and take advantage of your identity monitoring services.
- Provide Your Activation Code: [REDACTED] and Your Verification ID: [REDACTED]
- You have until **June 30, 2020** to activate your identity monitoring services. Your Activation Code will not work after this date.
- To sign in to your account after you have activated your identity monitoring services, please visit <https://login.idheadquarters.com/>

### ADDITIONAL DETAILS REGARDING YOUR TWELVE MONTH KROLL IDENTITY MONITORING SERVICES

#### **Take advantage of your Identity Monitoring Services**

You've been provided with access to the following services from Kroll:

#### **Single Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data – for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

#### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

#### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.



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## **Monitor Your Accounts**

In addition to enrolling to receiving the complimentary services detailed above, we encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements and explanation of benefits, and to monitor your credit reports for suspicious activity and to detect errors. 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:

### **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)

### **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)

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.);
1. Social Security number;
2. Date of birth;
3. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
4. Proof of current address, such as a current utility bill or telephone bill;
5. A legible photocopy of a government-issued identification card (state driver’s license or ID card, military identification, etc.);
6. 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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**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

[www.transunion.com/fraud-victim-resource/place-fraud-alert](http://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](http://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](http://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. This notice has not been delayed by law enforcement.

**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\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://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.