RECEIVED
JAN 24 2022
CONSUMER PROTECTION

MULLEN COUGHLIN LLC
ATTORNEYS AT LAW

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

January 14, 2022

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 Fluid Components International, LLC ("FCI"), located at 1755 La Costa Meadows Drive, San Marcos, CA 92078, and write to notify your office of an incident that may affect the security of some personal information relating to one (1) New Hampshire resident. 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, FCI 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 November 9, 2021, FCI became aware of suspicious activity within its IT environment. FCI promptly took steps to assess the activity and determined that it was the target of a cyber-attack affecting certain systems. Since that time, FCI has been working diligently, with the assistance of third-party forensic investigators, to confirm the nature and scope of the activity and restore the function of FCI's environment. While the forensic investigation into this incident is active and ongoing, to date, FCI determined that certain information may have been viewed on or copied from its system without authorizations as part of the cyber-attack, which occurred between September 17, 2021 and November 8, 2021. Though FCI's efforts to determine what information may be affected by this incident are still ongoing, beginning on or about December 9, 2021, FCI identified certain personal information in the potentially affected data and FCI has begun taking steps to notify individuals whose data might be involved.

Although the investigation is ongoing, in general, FCI stores human resources related information relating to vendors, employees, and their spouses and dependents on the potentially affected systems. The information varies by individual/entity but may include name, Social Security number, driver's license number/state identification card number, passport number, tax identification number, medical treatment and condition information, health insurance information, username and password, and financial account

information. Therefore, in an abundance of caution, FCI is notifying potentially affected individuals based on the facts known to date to ensure that they are aware of this incident. While the efforts to determine what information may be affected by this incident are still ongoing, FCI has begun taking steps to notify individuals whose data might be involved.

Notice to New Hampshire Resident

On or about January 14, 2022, FCI provided written notice of this incident to potentially affected individuals, including 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, FCI moved quickly to investigate and respond to the incident and assess the security of FCI systems. FCI has notified law enforcement authorities, and it is reviewing its existing policies and procedures, as well as modifying them as necessary. FCI is working to determine information potentially affected and provide notice to those individuals. This notice includes an offer of access to credit monitoring services for 24 months at no cost to the individual.

Additionally, FCI is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4773.

Very truly yours,

M. Alexandra Belton of
MULLEN COUGHLIN LLC

MABB/lhw
Enclosure

Exhibit A

FCI® FLUID COMPONENTS INTERNATIONAL LLC

Return Mail Processing
PO Box 999
Suwanee, GA 30024

January 14, 2022

1 1 6 **********SNGLP
SAMPLE A. SAMPLE - Individual - General
APT ABC
123 ANY ST
ANYTOWN, US 12345-6789

Re: Notice of [Extra1]

Dear Sample A. Sample:

Fluid Components International, LLC ("FCI") is writing to make you aware of a recent incident that may affect the security of some of your information. This notice provides you with information about the incident, our response, and steps you may take to better protect your information, should you feel it is appropriate to do so.

What Happened?

On November 9, 2021, we became aware of suspicious activity within our IT environment. We promptly took steps to assess the activity and determined that FCI was the target of a cyber-attack that was impacting certain systems. Since that time, FCI has been working diligently, with the assistance of third-party forensic investigators, to confirm the nature and scope of the activity and restore the function and security of FCI's environment. While the forensic investigation into this incident is active and ongoing, to date, we have determined that certain information may have been viewed on or copied from our system without authorization as part of the cyber-attack, which occurred between September 17, 2021 and November 8, 2021. We began a thorough review of the data that was potentially viewed or affected to determine whether it contained any sensitive information and identify affected individuals. While our efforts to determine what information may be affected by this incident are still ongoing, beginning on or about December 9, 2021, we identified certain personal information in the potentially affected data and we have begun taking steps to notify individuals whose data might be involved.

What Information Was Involved?

The investigation and review of the involved FCI systems and files are ongoing. The information that may be affected includes data that FCI holds in relation to its employees and may vary by person. To date, we have identified that this includes name and Social Security number in some instances. It may also include other HR related data, such as financial account information, credit or debit card information, federal, state or driver's license identification numbers, health insurance information, medical information, usernames and passwords, or other personal information. FCI is providing individuals with information on how to protect against potential misuse of such information and encourages individuals to review this information and take any steps they view as appropriate.

What We Are Doing.

We take this event and the security of personal information in our care very seriously. We have security measures in place to protect the data on our systems and we continue to assess and update security measures and training to our employees to safeguard the privacy and security of information in our care. We have reported this incident to law enforcement, and we are also notifying regulatory authorities, as required by law.

As an added precaution, we are also offering you access to two (2) years of credit monitoring and identity monitoring services through Experian at no cost to you. These services include credit monitoring, fraud consultation, and identity theft restoration. If you wish to activate Experian's identity monitoring services, you may follow the instructions included in the "Steps You Can Take to Protect Your Information."

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.

You can find out more about how to safeguard your information in the enclosed *Steps You Can Take to Protect Information.* There, you will find additional information about the complimentary credit monitoring and identity restoration services we are offering and how to enroll.

For More Information.

We understand that you may have questions that are not addressed in this letter. If you have additional questions or concerns, please call our dedicated assistance line at (877) 736-4493, which is available Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number You may also write Fluid Components International, LLC at 1755 La Costa Meadows Drive, San Marcos, CA 92078.

We take this event very seriously and sincerely regret any inconvenience or concern it may cause you.

Sincerely,

Dan McQueen
President and Chief Executive Officer
Fluid Components International LLC

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Complimentary Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorks℠ for 24 months.

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. 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 from the date of the incident (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 Identity Restoration is available to you for 24 months 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.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 24 month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by 03/31/2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: https://www.experianidworks.com/credit
- Provide your **activation code**:

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (877) 736-4493 by **03/31/2022.** Be prepared to provide engagement number 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 specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

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,

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* 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.

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 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 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 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 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 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.

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