



LEWIS BRISBOIS BISGAARD & SMITH LLP

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April 16, 2021

VIA EMAIL

Attorney General Gordon MacDonald
Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301
DOJ-CPB@doj.nh.gov

Re: Notice of Data Security Incident

To Whom It May Concern:

We represent FPI Management (“FPI”), a property management company headquartered in Folsom, California. This letter is being sent because FPI recently experienced a data security incident that may have impacted personal information belonging to New Hampshire residents. The potentially impacted information may have included residents’ names as well as such residents’ address and Social Security number.

On August 14, 2020, FPI learned that it had experienced a data security incident that disrupted access to certain of its systems. Upon discovering this incident, FPI took immediate steps to secure its systems prior to restoration. In addition, FPI retained independent cybersecurity experts to conduct an investigation in order to determine what happened and whether sensitive information was accessed or acquired without authorization. FPI learned that an unauthorized third party had gained access to certain FPI systems and that personal information stored on such systems was accessed or acquired without authorization. On March 3, 2021, following a thorough review of potentially impacted information, FPI determined that personal information belonging to New Hampshire residents may have been accessed or acquired without authorization. FPI then worked diligently to provide notification of this incident.

FPI notified six potentially impacted New Hampshire residents of this incident via the attached sample letter on April 15, 2021. In so doing, FPI offered notified individuals complimentary credit monitoring and identity theft restoration services through Experian.

Please contact me should you have any questions.

Very truly yours,

/s/ Lauren D. Godfrey

Lauren D. Godfrey of
LEWIS BRISBOIS BISGAARD & SMITH LLP

Encl.: Sample Consumer Notification Letter

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

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

Re: Notice of Data Breach

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

I am writing to inform you of a data security incident recently experienced by FPI Management ("FPI") that may have impacted your personal information. FPI takes the privacy and security of all information within its possession very seriously, which is why I am writing to notify you of this incident and to inform you of steps that can be taken to help safeguard your information.

What Happened: On August 14, 2020, FPI learned that it had experienced a data security incident that disrupted access to certain of its systems. Upon discovering this incident, FPI took immediate steps to secure its systems prior to restoration. In addition, FPI retained independent cybersecurity experts to conduct an investigation in order to determine what happened. FPI learned that an unauthorized third party had gained access to certain FPI systems and that personal information stored on such systems was accessed or acquired without authorization. On March 3, 2021, following a thorough review of potentially impacted information, FPI learned that your personal information may have been accessed or acquired without authorization as a result of this incident. FPI then worked diligently to provide notification of this incident.

Please note that FPI is not aware of the misuse of any potentially impacted information in connection with this incident, and that FPI is notifying potentially impacted individuals out of an abundance of caution.

What Information Was Involved: The incident may have impacted your name, address, date of birth, Social Security number, driver's license number or other government identification card number, passport number, tax identification number, financial account information, online credentials, digital signature, payment card information, and / or medical information.

What We Are Doing: When FPI learned of this incident, FPI immediately began containment, mitigation, and restoration efforts. As set forth above, FPI also launched an investigation and engaged independent cybersecurity experts to determine what happened and whether sensitive information was impacted. In addition, FPI implemented additional security measures to further harden its digital environment in an effort to prevent a similar event from occurring in the future. Finally, FPI reported this incident to the Federal Bureau of Investigation and will provide any assistance needed to hold the perpetrators accountable.

In connection with this incident, and out of an abundance of caution, FPI is offering complimentary identity theft protection services through Experian IdentityWorksSM. Enrollment instructions can be found on the next page of this letter.

What You Can Do: While we are not aware of any misuse of potentially impacted information in connection with the incident, as a precautionary measure, we recommend that you remain vigilant and review your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company that maintains your account. You should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities.

In addition, we encourage that you enroll in the complimentary one-year membership of Experian's® IdentityWorksSM credit monitoring and identity protection services we are offering. To activate your membership and start monitoring your personal information please follow the steps below:

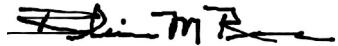
1. ENROLL by: <<b2b_text_1(EnrollmentDeadline)>> (Your code will not work after this date.)
2. Visit the **Experian IdentityWorks website** to enroll: <https://www.experianidworks.com/3bcredit>
3. PROVIDE the **Activation Code**: <<Member ID>>

If you have questions about the IdentityWorks product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877.890.9332 and provide the engagement code <<b2b_text_2(EngagementNumber)>>. To activate credit monitoring you must be over the age of 18, and have established credit in the U.S., a Social Security number in your name, and a U.S. residential address associated with your credit file.

For More Information: Further information about how to help protect your personal information appears on the following page. If you have questions or need assistance, please call 1-855-935-6094 from 6:00 a.m. to 3:30 p.m. Pacific Time, Monday through Friday. We remain committed to protecting your personal information and apologize for any worry or inconvenience this may cause you.

The security of your information is a top priority for FPI, and we are committed to safeguarding your data and privacy.

Sincerely,



Blaine M. Reeve
Chief Information Officer
FPI Management

Steps You Can Take to Protect Your Information

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print this form at <https://www.annualcreditreport.com/cra/requestformfinal.pdf>. You also can contact one of the following three national credit reporting agencies:

TransUnion P.O. Box 1000 Chester, PA 19016 1-800-916-8800 www.transunion.com	Experian P.O. Box 9532 Allen, TX 75013 1-888-397-3742 www.experian.com	Equifax P.O. Box 740241 Atlanta, GA 30374 1-800-525-6285 www.equifax.com	Free Annual Report P.O. Box 105281 Atlanta, GA 30348 1-877-322-8228 annualcreditreport.com
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Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: Under U.S. law, you have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state attorney general about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the attorney general in your state. Residents of Maryland, North Carolina, and Rhode Island can obtain more information from their attorneys general using the contact information below.

Federal Trade Commission 600 Pennsylvania Ave, NW Washington, DC 20580 www.consumer.ftc.gov www.ftc.gov/idtheft 1-877-438-4338	Maryland Attorney General 200 St. Paul Place Baltimore, MD 21202 www.oag.state.md.us 1-888-743-0023	North Carolina Attorney General 9001 Mail Service Center Raleigh, NC 27699 www.ncdoj.gov 1-877-566-7226	Rhode Island Attorney General 150 South Main Street Providence, RI 02903 www.riag.ri.gov 401-274-4400
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You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include the right to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, and your rights pursuant to the FCRA, please visit http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.

Personal Information of a Minor: You can request that each of the three national credit reporting agencies perform a manual search for a minor's Social Security number to determine if there is an associated credit report. Copies of identifying information for the minor and parent/guardian may be required, including birth or adoption certificate, Social Security card, and government issued identification card. If a credit report exists, you should request a copy of the report and immediately report any fraudulent accounts to the credit reporting agency. You can also report any misuse of minor's information to the FTC at <https://www.identitytheft.gov/>. For more information about Child Identity Theft and instructions for requesting a manual Social Security number search, visit the FTC website: <https://www.consumer.ftc.gov/articles/0040-child-identity-theft>.

ADDITIONAL DETAILS REGARDING YOUR 12-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, Equifax and Transunion files 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.
- **Up to \$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

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 at 1-877-288-8057. 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 (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 this Identity Restoration support is available to you for one year 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. You will also find self-help tips and information about identity protection at this site.