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CONSUMER PROTECTION

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

February 22, 2021

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 Goodwin Procter LLP (“Goodwin”), located at 100 Northern Ave, Boston, MA 02210, and are writing to notify you of a data security incident that occurred on January 20, 2021. The incident involved the compromise of certain data belonging to its data owner clients that may affect the security of some personal information relating to one (1) New Hampshire resident. By providing this notice on behalf of its impacted data owner client, Goodwin 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 22, 2021, Goodwin was notified of a security issue by Accellion, a third-party vendor whose File Transfer Appliance was used by Goodwin for large file transfers on behalf of clients. Goodwin immediately took the appliance offline and launched an investigation into the issue and its impact on both Goodwin and its clients. Goodwin reported the incident to law enforcement and worked with forensic investigators to determine the nature and scope of the incident. Through this investigation, which is ongoing, Goodwin confirmed that certain files present on the appliance on January 20, 2021 were downloaded by the unknown individual as a result of the exploitation of a previously unknown vulnerability in the Accellion appliance.

Goodwin analyzed the downloaded data to determine both contents and data ownership. On or about February 12, 2021, Goodwin provided notice of this event to its client data owner and offered to fulfill disclosure obligations arising under U.S. data breach notice laws on behalf of the data owner. The information that could have been subject to unauthorized access includes name,

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salary and job history, address, date of birth, Driver's License number and direct deposit information. Goodwin is unaware of any actual or attempted misuse of this information, or any other information contained within the downloaded files.

Notice to New Hampshire Resident

On or about February 16, 2021, Goodwin provided written notice of this incident to 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, Goodwin moved quickly to investigate and respond to the incident, assess the security of the Accellion appliance and Goodwin systems, evaluate their data security policies and procedures, and notify both affected and unaffected clients of this event. Goodwin provided notice of this incident to impacted individuals on their affected clients' behalf, when authorized to do so. While Goodwin is unaware of any actual or attempted misuse of any information contained in the downloaded files, Goodwin is providing, where available and at no cost to its impacted clients or the affected individuals, access to credit monitoring and identity restoration services for two (2) years through Experian, to individuals whose personal information was contained in the downloaded files. Goodwin is also 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. Goodwin 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4554.

Very truly yours,



Matthew V. Toldero of
MULLEN COUGHLIN LLC

EXHIBIT A



February 16, 2021

Re: Notice of Data Breach

Dear [REDACTED],

Goodwin Procter LLP (“Goodwin”) was recently notified by Accellion, a third-party vendor whose File Transfer Appliance is used by Goodwin for large file transfers on behalf of clients, [REDACTED] of a security incident impacting this file transfer service. As detailed below, this event impacts the security of certain information relating to you. Although we are unaware of any actual or attempted misuse of your information at this time, we are providing you with information about the event, our response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

What Happened? On January 22, 2021, Accellion informed Goodwin of a security issue with its secure file transfer platform. We immediately took the appliance offline and launched an investigation into the issue and its impact on both Goodwin and our clients. This investigation, which is being supported by a leading forensic investigation firm, determined that certain files present on the appliance on January 20, 2021 were downloaded by an unknown user as a result of the exploitation of a previously unknown vulnerability in the Accellion appliance.

What Information Was Involved? Although the investigation is ongoing, on or about February 11, 2021, we determined file(s) containing your name, salary and job history, address, date of birth, driver’s license number and direct deposit information were downloaded during this event by an unknown user. This information was contained in documents produced as part of [REDACTED].

What Goodwin is Doing. We take this incident and the security of personal information in our care very seriously. Upon becoming aware of the vulnerability, we immediately took steps to terminate access and use of the service, investigate the event, and confirm the security of our network. Additionally, while we go to great lengths to protect business and personal information entrusted to us, as part of our ongoing commitment to the security of information in our care, we are further evaluating our data security policies and procedures. Goodwin provided notice of this incident to [REDACTED], and is providing notice of this event to you, so that you may take further steps to protect your personal information should you feel it is appropriate to do so.

What You Can Do. While we are unaware of misuse of information relating to you, we encourage you to remain vigilant against incidents of identity theft and fraud and to review the information in the attached "*Steps You Can Take to Protect Personal Information.*" Goodwin is also offering you complimentary access to 24 months of triple-bureau credit monitoring and identity restoration services through Experian's IdentityWorks 3-Bureau Credit Monitoring product. Information on this service and enrollment directions are contained in the attached information. You must enroll to receive these services.

For More Information. If you have any questions, feel free to call 202-346-4257 or 212-459-7399.

We sincerely regret the inconvenience this incident may cause you.

Sincerely,

Goodwin Procter LLP

Steps You Can Take to Protect Personal Information

Credit Monitoring Services:

To help protect your identity, we are offering a complimentary two-year membership of Experian's® IdentityWorksSM. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: 5.31.21** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: www.experianidworks.com/3bplus
- Provide your **activation code:** [REDACTED]

If you have questions about the 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 by May 31, 2021. Be prepared to provide engagement number [REDACTED] 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, Equifax and Transunion files for indicators of fraud.
- **Internet Surveillance:** Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** 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 877.890.9332. 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).

* 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.

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.

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

PO 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

PO 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:

Experian

P.O. Box 9554
Allen, TX 75013
1-888-397-3742

www.experian.com/fraud/center.htm

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TransUnion

P.O. Box 2000
Chester, PA 19016
1-800-680-7289

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

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 and Identity Theft Clearinghouse can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov and www.consumer.gov/idtheft, 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 and your state Attorney General. This notice has not been delayed by law enforcement.