



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

MAR 12 2021

CONSUMER PROTECTION

Jeffrey J. Boogay
Office: (267) 930-4784
Fax: (267) 930-4771
Email: jboogay@mullen.law

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

March 5, 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 The Home for Little Wanderers located at 10 Guest Street, Brighton, MA 02135, 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. The investigation into this matter is ongoing, and his notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, The Home for Little Wanderers 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 or about December 28, 2020, The Home became aware of unusual activity within an employee's email account. In response, The Home launched an investigation, with the assistance of third-party forensic specialists, to determine the nature and scope of the incident. The investigation determined that certain email accounts were impacted between November 10, 2020 and December 31, 2020; however, the forensic investigation was unable to determine whether any emails and/or attachments were viewed. The Home, in an abundance of caution, began an extensive review of the email accounts to determine whether they contained any personal information and if so, to whom the information relates. This review is ongoing. While the review is ongoing, The Home is beginning the process of providing notice to those individuals it knows are impacted as of now.

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The information that could have been subject to unauthorized access could include name and diagnosis/condition, lab results, medications, medical record number, medical treatment information, address, date of birth, and Social Security number.

Notice to New Hampshire Resident

On or about March 5, 2021, The Home for Little Wanderers began providing 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*. The Home is also issuing a press release to statewide media regarding this event and posting notice on the home page of its website. We will supplement this notification if it is determined that a significant number of additional resident will receive notification of this event.

Other Steps Taken and To Be Taken

Upon discovering the event, The Home for Little Wanderers moved quickly to investigate and respond to the incident, assess the security of The Home for Little Wanderers systems, and notify potentially affected individuals. The Home for Little Wanderers is also working to implement additional safeguards and training to its employees. The Home for Little Wanderers is providing access to credit monitoring services for two (2) years, through Kroll, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, The Home for Little Wanderers 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. The Home for Little Wanderers 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.

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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 'Jeffrey J. Boogay', written in a cursive style.

Jeffrey J. Boogay of
MULLEN COUGHLIN LLC

JJB:jcj
Enclosure

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>>,

The Home for the Little Wanderers (“The Home”) is writing to inform you of a recent data privacy event that may involve some of your personal information. We take this event seriously and are providing you with information about the event and steps you may take to help protect your personal information, should you feel it is appropriate to do so.

What Happened? On or about December 28, 2020, The Home became aware of unusual activity within an employee’s email account. In response, The Home launched an investigation, with the assistance of third-party forensic specialists, to determine the nature and scope of the incident. The investigation determined that certain email accounts were impacted between November 10, 2020 and December 31, 2020; however, the forensic investigation was unable to determine whether any emails and/or attachments were viewed. The Home, in an abundance of caution, began an extensive review of the email accounts to determine whether they contained any personal information and if so, to whom the information relates. This review is ongoing. While the review is ongoing, we anticipate information related to you will be present within the email accounts and wanted to provide you with notice of the event.

What Information Was Involved? The following types of information were likely within the impacted email account: your name and diagnosis/conditions, lab results, medications, medical record number, medical treatment information, address, date of birth, and Social Security number. To date, we are unaware of any actual or attempted misuse of this information as a result of this incident and are sending this notice out of an abundance of caution.

What We Are Doing in Response? The security of information in our care is among our highest priorities. In addition to launching an internal investigation into this incident, we are reviewing our existing policies and procedures and will implement additional safeguards, as needed. In an abundance of caution, we are notifying you, so that you may take further steps to best protect your personal information, should you feel it is appropriate to do so.

Although we are unaware of any actual or attempted misuse of your personal information as a result of this incident, we are offering you access to complimentary credit monitoring, fraud consultation, and identity theft restoration services through Kroll. We will also be reporting this incident to the U.S. Department of Health and Human Services and state regulators, as appropriate.

What Can You Do? We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and monitor your credit reports for suspicious activity. You may also review the information contained in the attached “Steps You Can Take to Protect Personal Information.” There you will also find more information on the credit and identity monitoring services we are making available to you including instructions for activating these services. While The Home will cover the cost of these services, you will need to complete the activation process.

For More Information. We recognize that you may have questions not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-855-907-5013, Monday through Friday, 9:00am to 6:30pm Eastern Standard Time. You may also write to us at 10 Guest Street, Brighton, MA 02135.

Sincerely,

Heidi Ferreira
Vice President of Risk Management, Compliance, and Data Governance
The Home for Little Wanderers

Steps You Can Take to Help Protect Your Information

Activate Your Complimentary Identity Monitoring



Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.idheadquarters.com> to activate and take advantage of your identity monitoring services.

*You have until **June 10, 2021** to activate your identity monitoring services.*

Membership Number: <<Member ID>>

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have 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 will be able to help you determine if it is 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 will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

Monitor Your Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud and to review your account statements and 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

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.);
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.

Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

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.html

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-680-7289
<https://www.transunion.com/fraud-alerts>

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 can 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.



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

To the Parent or Guardian of:

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

Dear Parent or Guardian of <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

The Home for the Little Wanderers (“The Home”) is writing to inform you of a recent data privacy event that may involve some of your minor’s personal information. We take this event seriously and are providing you with information about the event and steps you may take to help protect your minor’s personal information, should you feel it is appropriate to do so.

What Happened? On or about December 28, 2020, The Home became aware of unusual activity within an employee’s email account. In response, The Home launched an investigation, with the assistance of third-party forensic specialists, to determine the nature and scope of the incident. The investigation determined that certain email accounts were impacted between November 10, 2020 and December 31, 2020; however, the forensic investigation was unable to determine whether any emails and/or attachments were viewed. The Home, in an abundance of caution, began an extensive review of the email accounts to determine whether they contained any personal information and if so, to whom the information relates. This review is ongoing. While the review is ongoing, we anticipate information related to your minor will be present within the email accounts and wanted to provide you with notice of the event.

What Information Was Involved? After a thorough review process, The Home determined that the following information related to your minor may have been accessible within the email accounts: your name and diagnosis/conditions, lab results, medications, medical record number, medical treatment information, address, date of birth, and Social Security number. To date, we are unaware of any actual or attempted misuse of your minor’s information as a result of this incident and are sending this notice out of an abundance of caution.

What We Are Doing in Response? We take this incident and the security of your minor’s personal information seriously. Upon learning of this issue, The Home immediately launched an investigation and reset the employees’ email credentials. We are also taking additional actions to review existing security policies and procedures.

Although we are unaware of any actual or attempted misuse of your minor’s personal information as a result of this incident, we are offering your minor access to Minor Identity Monitoring through Kroll. We will also be reporting this incident to the U.S. Department of Health and Human Services and state regulators, as appropriate.

What You Can Do. Please review the enclosed “Steps You Can Take to Help Protect Your Minor’s Information.” We have also arranged for complimentary Minor Identity Monitoring through Kroll. Instructions on how to activate these services is included in the enclosed “Steps You Can Take to Help Protect Your Minor’s Information.” While The Home will cover the cost of these services, you will need to complete the activation process.

For More Information. We understand that you may have questions that are not addressed in this notice. If you have additional questions or concerns, please contact us by mail at 10 Guest Street, Brighton, MA 02135, or our toll-free dedicated number at 1-855-907-5013, Monday through Friday, 9:00am to 6:30pm Eastern Standard Time.

We apologize for any inconvenience or concern this incident may cause you.

Yours sincerely,

Heidi Ferreira
Vice President of Risk Management, Compliance, and Data Governance
The Home for Little Wanderers

Steps You Can Take to Help Protect Your Minor's Information

Activate Your Minor's Complimentary Identity Monitoring



Your minor's services include Minor Identity Monitoring, Fraud Consultation, and Identity Theft Restoration. To activate services:

Visit <https://enroll.idheadquarters.com> to activate and take advantage of your identity monitoring services.

You have until **June 10, 2021** to activate your identity monitoring services.

Membership Number: <<Member ID>>

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

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

Minor Identity Monitoring

Minor Identity Monitoring detects when names, addresses, and credit information is associated with your child's Social Security number. An alert will be sent to you when activity is detected. The presence of a credit file may be an indicator of identity theft or fraud for children who, as minors, should not have a credit history.

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 will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

Monitor Your Minor's Accounts

Typically, credit reporting agencies do not have a credit report in a minor's name. To find out if your minor has a credit report or to request a manual search for your minor's Social Security number each credit bureau has its own process. To learn more about these processes or request these services, you may contact the credit bureaus by phone or in writing or you may visit the below websites:

Experian

P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/form-minor-child.html

TransUnion

P.O. Box 2000
Chester, PA 19016
1-888-909-8872
www.transunion.com/credit-disputes/child-identity-theft-inquiry-form

Equifax

P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
<https://www.equifax.com/personal/education/identity-theft/child-identity-theft/>

To request information about the existence of a credit file in your minor's name, search for you minor's Social Security number, place a security freeze on your minor's credit file, place a fraud alert on your minor's credit report (if one exists), or request a copy of your minor's credit report you may be required to provide the following information:

- A copy of your driver's license or another government issued identification card, such as a state ID card, etc.;
- Proof of your address, such as a copy of a bank statement, utility bill, insurance statement, etc.;
- A copy of your minor's birth certificate;
- A copy of your minor's Social Security card;

- Your minor's full name, including middle initial and generation, such as JR, SR, II, III, etc.;
- Your minor's date of birth; and
- Your minor's previous addresses for the past two years.

All U.S. Residents: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580, www.consumer.gov/idtheft, 1-877-IDTHEFT (438-4338).

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; 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.