



MULLEN  
COUGHLIN<sup>LLC</sup>  
ATTORNEYS AT LAW

RECEIVED  
MAY 11 2020  
CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302  
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May 5, 2020

**VIA FIRST CLASS 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 Impact Mobile Home Communities (“Impact MHC”), P.O. Box 457, Cedaredge, CO 81413, and are writing to notify you of a recent incident that may affect the security of the personal information of approximately four (4) New Hampshire residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Impact MHC does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data incident notification statute, or personal jurisdiction.

**Nature of the Data Event**

On July 3, 2019, Impact MHC became aware of suspicious activity relating to an employee email account, and immediately launched an investigation to determine what may have happened. Working together with a leading computer forensics specialist, their investigation determined that an unauthorized individual(s) accessed several employee email accounts between July 1, 2019 and July 31, 2019. Two of the email accounts were accessed between October 3, 2018 and July 8, 2019.

Because the investigation was unable to determine which email messages in the accounts may have been viewed or acquired by the unauthorized actor(s), Impact MHC reviewed the entire contents of the impacted email accounts to identify what personal information was accessible to the unauthorized actor(s). On February 27, 2020, Impact MHC identified the individuals potentially impacted by this incident after a thorough programmatic and manual review of the email accounts. Once they confirmed the individuals who were potentially impacted, Impact MHC worked to

identify current mailing addresses for the impacted individuals and began preparing an accurate written notice of this incident.

The types of personal information relating to New Hampshire residents determined to be stored within the impacted email accounts were not identical for every potentially affected individual, and they included the following: name, Social Security number and financial account number.

### **Notice to New Hampshire Residents**

On May 5, 2020, Impact MHC began mailing written notice of this incident to potentially impacted individuals, including approximately four (4) New Hampshire residents. Such notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

### **Other Steps Taken**

Impact MHC is offering the affected individuals complimentary access to one year of free credit monitoring and identity restoration services through ID Experts. Additionally, Impact MHC is providing potentially affected individuals with information on how to protect against identity theft and fraud, including information on how to contact the Federal Trade Commission and law enforcement to report any attempted or actual identity theft and fraud. In addition to providing notice of this incident to you, Impact MHC will be providing notice to other state regulators.

Impact MHC has taken several immediate steps to protect against similar incidents in the future. Upon learning of this incident, Impact MHC quickly changed all employee email account passwords and took steps to secure the impacted accounts. They are continuing to monitor their systems to ensure they are secure. Impact MHC is currently implementing additional technical safeguards as well as additional training and education to its employees to prevent similar future incidents.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security incident, please contact me at (267) 930-4775.

Very truly yours,



Christopher J. DiLenno of  
MULLEN COUGHLIN LLC

CJD:KML  
Enclosure

# EXHIBIT A



C/O ID Experts

<<Return Address>>

<<City>>, <<State>> <<Zip>>

<<First Name>> <<Last Name>>

<<Address 1>> <<Address 2>>

<<City>>, <<State>> <<Zip>>

<p>To Enroll, Please Call:  1-833-979-2226  Or Visit:  <a href="https://ide.myidcare.com/impactMHC">https://ide.myidcare.com/impactMHC</a>  Enrollment Code: &lt;XXXXXXXXXX&gt;</p>
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May 4, 2020

Re: Notice of Data [Variable Text 1]

Dear <<First Name>> <<Last Name>>:

Impact Mobile Home Communities (“Impact MHC”) is writing to notify you of an incident that may affect the security of some of your personal information. While we are unaware of any actual or attempted misuse of your information, this letter provides information about the incident and the resources available to you to help protect your information from possible misuse, should you feel it is appropriate to do so.

**What Happened?** On July 3, 2019, Impact MHC became aware of suspicious activity relating to an employee email account. We immediately launched an investigation to determine what may have happened. Working together with a leading computer forensics firm, our investigation determined that an unauthorized individual or individuals accessed several employee email accounts between July 1, 2019 and July 31, 2019. Two of the email accounts were accessed between October 3, 2018 and July 8, 2019.

Because we were unable to determine which email messages in the accounts may have been viewed or acquired by the unauthorized actor, we reviewed the entire contents of the impacted email accounts to identify what personal information was accessible to the unauthorized actor(s). Due to the large volume of emails to be reviewed, this was a very lengthy and labor-intensive process. On February 27, 2020, we identified the individuals potentially impacted by this incident after a thorough programmatic and manual review of the email accounts. Once we confirmed the individuals who were potentially affected, Impact MHC worked to identify contact information for the impacted individuals, and began preparing an accurate written notice of this incident.

**What Information Was Affected?** Although we cannot confirm whether your personal information was actually accessed, viewed, or acquired without permission, we are providing you this notification out of an abundance of caution, because such activity cannot be ruled out. The following types of your information were located in an email or attachment that may have been accessed or acquired by an unauthorized actor: your name and [Variable Text 2].

**What Are We Doing?** Information privacy and security are among our highest priorities. Impact MHC has strict security measures in place to protect the information in our possession. Upon learning of this incident, we quickly changed all employee email account passwords and took steps to secure the accounts. We are currently implementing additional technical safeguards and employee training to prevent similar future incidents.

**What Can You Do?** Although we are not aware of any fraudulent misuse of your information, we arranged to have ID Experts monitor your identity for 1 year at no cost to you as an added precaution. Please review the instructions contained in the attached “Steps You Can Take to Protect Your Information” to enroll in and receive these services. Impact MHC will cover the cost of this service, however, you will need to enroll yourself in the credit monitoring service if you would like 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 our dedicated assistance line at 1-833-979-2226, Monday through Friday, 7:00 a.m. to 7:00 p.m. Mountain Time.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Dave Reynolds', with a long, sweeping underline.

Dave Reynolds  
President & CEO, Impact Mobile Home Communities

## Steps You Can Take to Protect Your Information

### **Enroll in Credit Monitoring**

As an added precaution, we are offering identity theft protection services through ID Experts®, the data breach and recovery services expert, to provide you with MyIDCare™. MyIDCare services include: 12 months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. With this protection, MyIDCare will help you resolve issues if your identity is compromised.

**1. Website and Enrollment.** Go to <http://ide.myidcare.com/impactMHC> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. The deadline to enroll in free MyIDCare services is August 4, 2020.

**2. Activate the credit monitoring** provided as part of your MyIDCare membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, MyIDCare will be able to assist you.

**3. Telephone.** Contact MyIDCare at 1-833-979-2226 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

### **Monitor Your Accounts.**

To protect against the possibility of identity theft or other financial loss, we encourage you to remain vigilant, to review your financial and other account statements, and to monitor your credit reports for suspicious activity.

**Credit Reports.** 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.

**Security Freeze.** 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](http://www.experian.com/freeze/center.html)

#### **TransUnion**

P.O. Box 2000  
Chester, PA 19016  
1-888-909-8872

[www.transunion.com/credit-freeze](http://www.transunion.com/credit-freeze)

#### **Equifax**

PO Box 105788  
Atlanta, GA 30348  
1-800-685-1111

[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

If you request a security freeze with the above consumer reporting agencies, you may 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; and
6. A legible photocopy of a government issued identification card (state driver's license or ID card, military information, etc.)

To remove the security freeze, you must send a written request to each of the three credit bureaus by mail and include proper identification (name, address, and social security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have three (3) business days after receiving your request to remove the security freeze.

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 2002  
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 19016  
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, and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue, NW, Washington, DC 20580; [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft); 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC. You can also further educate yourself about placing a fraud alert or security freeze on your credit file by contacting the FTC or your state’s Attorney General. This notice was not delayed by a law enforcement investigation.

***For Maryland residents,*** the Attorney General can be contacted by mail at 200 St. Paul Place, Baltimore, MD, 21202; toll-free at 1-888-743-0023; by phone at (410) 576-6300; consumer hotline (410) 528-8662; and online at [www.marylandattorneygeneral.gov](http://www.marylandattorneygeneral.gov).

***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.

***For New York Residents:*** The New York Attorney General provides resources regarding identity theft protection and security breach response at [www.ag.ny.gov/internet/privacy-and-identity-theft](http://www.ag.ny.gov/internet/privacy-and-identity-theft). The New York Attorney General can be contacted by phone at 1-800-771-7755; toll-free at 1-800-788-9898; and online at [www.ag.ny.gov](http://www.ag.ny.gov).

***For North Carolina Residents:*** The North Carolina Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400, and online at [www.ncdoj.gov](http://www.ncdoj.gov).

***For Rhode Island Residents:*** The Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903, [www.riag.ri.gov](http://www.riag.ri.gov), 1-401-247-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are approximately 39 Rhode Island residents impacted by this incident.