



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

1266 E. Main Street, Soundview Plaza,  
Suite 700 R  
Stamford, CT 06902

May 31, 2023

**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**

To Whom It May Concern:

We represent iSpace, Inc. ("iSpace") located at 840 Apollo Street, Suite 100, El Segundo, CA 90245, and are writing to notify your office of an incident that may affect the security of certain personal information relating to two (2) New Hampshire residents. The investigation into this matter is ongoing, and this notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, iSpace 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 February 5, 2023, iSpace became aware of suspicious activity on its environment. Upon discovery, iSpace promptly took steps to secure its systems and commenced an investigation with the assistance of third party forensic specialists into the nature and scope of the incident. Through the investigation, iSpace determined that certain documents stored within iSpace's environment were accessed and copied by an unauthorized individual as part of the incident between January 30, 2023 and February 5, 2023. Based on the investigation, iSpace conducted a comprehensive and detailed review of the data involve, to determine the type of information present and to whom it related. On March 3, 2023, iSpace's review determined that the documents at issue contained information related to certain individuals of iSpace's covered entity clients. On or about April 3, 2023, iSpace notified its covered entity clients of this incident.

The information that could have been subject to unauthorized access includes

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

On or about May 31, 2023, iSpace provided written notice of this incident to two (2) New Hampshire residents. 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, iSpace moved quickly to investigate and respond to the incident, assess the security of iSpace systems, and identify potentially affected individuals. Further, iSpace notified the Federal Bureau of Investigation regarding the event. iSpace is also working to implement additional safeguards and training to its employees. iSpace is providing access to credit monitoring services for twelve (12) months, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

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

iSpace is providing written notice of this incident to relevant state and federal regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion. iSpace is also notifying the U.S. Department of Health and Human Services and prominent media pursuant to the Health Insurance Portability and Accountability Act (HIPAA).

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at

Very truly yours,

Gregory J. Bautista of  
MULLEN COUGHLIN LLC

GJB/jlm  
Enclosure

# **EXHIBIT A**





P.O. Box 989728  
West Sacramento, CA 95798-9728

To Enroll, Please Call:  
1-888-566-0714  
Or Visit:  
<https://response.idx.us/ispace>  
Enrollment Code: <<ENROLLMENT>>

<<NAME1>> <<NAME2>>  
<<ADDRESS1>>  
<<ADDRESS2>>  
<<CITY>>, <<STATE>> <<ZIP>>  
<<Country>>

May 31, 2023

**NOTICE OF <<SECURITY INCIDENT>> / [DATA BREACH]>>**

Dear <<NAME1>> <<NAME2>>:

iSpace, Inc. ("iSpace"), (as a business associate of <<Variable Data 2>>) writes to inform you of a recent incident that may have involved some of your information. iSpace received your information in connection with insurance eligibility services performed on behalf of [Data Owner]. While we are unaware of any attempted or actual misuse of your information at this time, we are providing you with this notice in an abundance of caution, to inform you of the incident, our response, and steps you may take to help protect your information, should you feel it is necessary to do so.

**What Happened?** On February 5, 2023, iSpace became aware of suspicious activity on its environment. Upon discovery, we promptly took steps to secure our systems and commenced an investigation with the assistance of third party forensic specialists into the nature and scope of the incident. Through the investigation, we determined that certain documents stored within iSpace's environment were accessed and copied by an unauthorized individual as part of the incident between January 30, 2023 and February 5, 2023. Based on the investigation, iSpace conducted a comprehensive and detailed review of the data involve, to determine the type of information present and to whom it related. iSpace notified <<Variable Data 2>> of the incident on April 3, 2023.

**What Information Was Involved?** On March 3, 2023, iSpace determined that data may have been accessed or copied as a result of this incident. Following further investigation and review of the data, on April 3, 2023, iSpace notified <<Variable Data 2>> that , <<Variable Data 3>> were found in the data. Although we are unaware of any actual or attempted misuse of your personal information, we are providing you with this notice out of an abundance of caution.

**What We Are Doing.** We take this incident and the security of personal information in our care very seriously. Upon learning of this incident, we moved quickly to investigate and respond to this incident, assess the security of our systems, restore functionality to our environment, and notify potentially affected individuals. We engaged third-party forensic specialists to assist with investigating the nature and scope of the incident. As part of our ongoing commitment to the security of information and prevent future incidents, we have engaged the services of security specialists to assist in examining our existing policies and practices relative to data privacy. Additionally, we notified federal law enforcement.

As an added precaution, we are providing you with access to <<enrollment length>> months of credit monitoring and identity protection services through IDX at no cost to you. A description of services and instructions on how to enroll can be found within the enclosed *Steps You Can Take to Help Protect Your Information*. Please note that you must complete the enrollment process yourself, as we are not permitted to enroll you in these services on your behalf.

**What You Can Do.** 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 and to detect errors. You can review the enclosed *Steps You Can Take to Help Protect Your Information* to learn helpful tips on steps you can take to help protect against possible information misuse, should you feel it appropriate to do so. You may also enroll in the complimentary credit monitoring and identity protection services we are offering to you.

**For More Information.** We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, or need assistance, please call our dedicated assistance line at \_\_\_\_\_, Monday through Friday 6:00 am to 6:00 pm Pacific Time. You may also write to iSpace at 840 Apollo Street, Suite 100, El Segundo, CA 90245.

iSpace takes the privacy and security of the information in our care seriously. We sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

Suresh Kothapalli  
CEO  
iSpace, Inc.



## Steps You Can Take to Help Protect Your Information

### **Enroll in Credit Monitoring and Identity Protection**

- 1. Website and Enrollment.** Go to <https://response.idx.us/isspace> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Please note that the deadline for enrollment is August 31, 2023.
- 2. Activate the credit monitoring** provided as part of your IDX identity protection 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, IDX will be able to assist you.
- 3. Telephone.** Contact IDX at 1-888-566-0714 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

### **IDX Identity will include enrollments into the following service components:**

**SINGLE BUREAU CREDIT MONITORING (adults\*)** - Monitoring of credit bureau for changes to the member's credit file such as new credit inquiries, new accounts opened, delinquent payments, improvements in the member's credit report, bankruptcies, court judgments and tax liens, new addresses, new employers, and other activities that affect the member's credit record.

**CYBERSCAN™** - Dark Web monitoring of underground websites, chat rooms, and malware, 24/7, to identify trading or selling of personal information like SSNs, bank accounts, email addresses, medical ID numbers, driver's license numbers, passport numbers, credit and debit cards, phone numbers, and other unique identifiers.

**IDENTITY THEFT INSURANCE** - Identity theft insurance will reimburse members for expenses associated with restoring their identity should they become a victim of identity theft. If a member's identity is compromised, the policy provides coverage for up to \$1,000,000, with no deductible, from an A.M. Best "A-rated" carrier. Coverage is subject to the terms, limits, and/or exclusions of the policy.

**FULLY-MANAGED IDENTITY RECOVERY** - ID Experts' fully-managed recovery service provides restoration for identity theft issues such as (but not limited to): account creation, criminal identity theft, medical identity theft, account takeover, rental application, tax fraud, benefits fraud, and utility creation. This service includes a complete triage process for affected individuals who report suspicious activity, a personally assigned IDCare Specialist to fully manage restoration of each case, and expert guidance for those with questions about identity theft and protective measures.

### **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](http://www.annualcreditreport.com) or call, 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 one-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 credit 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:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/help/">https://www.experian.com/help/</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
888-298-0045	1-888-397-3742	1-800-916-8800
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](http://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 District of Columbia residents*, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and [oag.dc.gov](http://oag.dc.gov).

*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 <https://www.marylandattorneygeneral.gov/>. iSpace is located at 840 Apollo Street, Suite 100, El Segundo, CA 90245 400 National Drive, Livermore, CA 94550.

*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 bureaus 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 may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>.

*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](http://www.ncdoj.gov).

*For Rhode Island residents*, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; [www.riag.ri.gov](http://www.riag.ri.gov); and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are [#] Rhode Island residents impacted by this incident.