

Edward J. Finn  
Office: (267) 930-4776  
Fax: (267) 930-4771  
Email: [efinn@mullen.law](mailto:efinn@mullen.law)

1275 Drummers Lane, Suite 302  
Wayne, PA 19087

November 13, 2019

**VIA FIRST-CLASS 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 Jones Street Residential, Inc. ("Jones Street") located at 100 High Street, Suite 2500, Boston, MA 02110, and are writing to notify your office of an incident that may affect the security of some personal information relating to nine (9) New Hampshire residents. By providing this notice, Jones Street 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. Jones Street reserves the right to supplement this response.

**Nature of the Data Event**

On July 18, 2019, Jones Street became aware of unusual activity involving a Jones Street employee's email account. Jones Street quickly commenced an investigation to determine the full nature and scope of the activity. With the assistance of computer forensics experts, Jones Street learned that one (1) employee email account was accessed without authorization between July 16, 2019 and July 18, 2019. In an abundance of caution, Jones Street undertook a comprehensive review of all emails and attachments in the email account to identify any sensitive information potentially accessible. On September 19, 2019, Jones Street confirmed certain personal information relating to New Hampshire residents was present in the account. The information that could have been subject to unauthorized access includes name, address, and one or more of the following: Social Security number, Driver's license number, date of birth and/or financial account information.

[Mullen.law](http://Mullen.law)

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

On November 12, 2019, Jones Street provided written notice of this incident to affected individuals, which includes nine (9) 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, Jones Street moved quickly to investigate and respond to the incident, change the account password, assess the security of Jones Street systems, and notify potentially affected individuals. Jones Street is also exploring ways to strengthen its security policies and procedures and is in the process of implementing multi-factor authentication as part of its ongoing commitment to information security. Along with notice, Jones Street is providing access to credit monitoring and identity restoration services for twenty-four (24) months, through Kroll, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Jones Street 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. Jones Street 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. Jones Street is notifying other regulators, as required.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4776.

Very truly yours,



Edward J. Finn of  
MULLEN COUGHLIN LLC

EJF/ken

# EXHIBIT A



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

<<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>  
<<Address1>>  
<<Address2>>  
<<City>>, <<State>> <<Zip>>

## RE: Notice of Data Breach

Dear <<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>,

Jones Street Residential, Inc. ("Jones Street") writes to notify you of a recent incident that may affect some of your personal information. While there is currently no evidence that your information has been misused as a result of this incident, we are providing you with information on the event, measures we have taken, and steps you can take to better protect your personal information should you feel it appropriate to do so.

**What Happened?** On July 18, 2019, Jones Street became aware of unusual activity involving a Jones Street employee's email account. Jones Street quickly commenced an investigation to determine the full nature and scope of the activity. With the assistance of leading computer forensics experts, we learned that one (1) employee email account was accessed without authorization between July 16, 2019 and July 18, 2019.

In an abundance of caution, Jones Street undertook a comprehensive review of all emails and attachments in the email account to identify any sensitive information potentially accessible. On September 19, 2019, Jones Street confirmed certain personal information relating to you was present in the account. Although we have no evidence of any actual or attempted misuse of your personal information, we are notifying you out of an abundance of caution.

**What Information Was Involved?** Jones Street's investigation confirmed the information present within the impacted email accounts at the time of the incident includes your <<ClientDef1(POTENTIAL DATA ELEMENTS)>>.

**What We Are Doing.** Information privacy and security are among our highest priorities. Jones Street has strict security measures in place to protect information in our care. Upon learning of this incident, Jones Street immediately changed the account password and launched an investigation. Jones Street also continues to explore ways to strengthen its security policies and procedures as part of our ongoing commitment to information security.

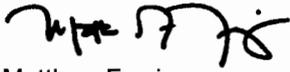
While we have no evidence of actual or attempted misuse of your personal information, we arranged for Kroll to provide credit monitoring and identity restoration services at no cost to you for two (2) years. Instructions on how to enroll in these services may be found in the enclosed "Steps You Can Take to Protect Personal Information."

**What You Can Do.** 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. The enclosed "Steps You Can Take to Protect Personal Information" contains steps you can take to protect your personal information. You may also enroll to receive the credit monitoring and identity restoration services we are making available to you as we are unable to enroll in these services on your behalf.

**For More Information.** We understand you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at **1-855-946-0127, Monday through Friday from 9:00 a.m. to 6:30 p.m. Eastern Time.**

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

Regards,

A handwritten signature in black ink, appearing to read 'Matthew Frazier', written in a cursive style.

Matthew Frazier  
Founder | Chief Executive Officer

## Steps You Can Take to Protect Personal Information

### Enroll in Credit Monitoring

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for two years. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit [krollbreach.idMonitoringService.com](http://krollbreach.idMonitoringService.com) to activate and take advantage of your identity monitoring services.

You have until **February 10, 2020** to activate your identity monitoring services.

Membership Number: <<Member ID>>

**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 charges or 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](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.

**Place a 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**

P.O. 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 160  
Woodlyn, PA 19094  
1-888-909-8872

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

**Place a Fraud Alert.** 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](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, 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](http://www.identitytheft.gov); 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. Jones Street can be reached at 100 High Street, Suite 2500, Boston, MA 02110.

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 Maryland residents*, the Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662; and [www.oag.state.md.us](http://www.oag.state.md.us).

*For North Carolina residents*, the Attorney General can be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6400; and [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); and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident.

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



## **TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES**

You've been provided with access to the following services<sup>1</sup> 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 can help you determine if it's 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 can dig deep to uncover the scope of the identity theft, and then work to resolve it.

<sup>1</sup> 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.