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

RECEIVED

AUG 30 2021

CONSUMER PROTECTION

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

August 24, 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 MRAG Americas, Inc. ("MRAG"), located at 8950 Martin Luther King Jr Street N, Suite 202, St. Petersburg, FL 33702, and are writing to notify your office of an incident that may affect the security of some personal information relating to eighteen (18) New Hampshire residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, MRAG 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**

MRAG became aware of unusual activity involving an employee email account and immediately began an investigation with the assistance of third-party forensic investigators. On March 15, 2021, the investigation determined that an employee email account was accessed without authorization at varying times between February 2, 2021 and February 3, 2021. MRAG was unable to determine what, if any, emails and attachments were viewed while the account was subject to unauthorized access.

In an abundance of caution, MRAG completed a programmatic and manual review to determine whether sensitive information was present in the account at the time of the event. On June 7, 2021, MRAG determined that certain personal information was present in the email account at the time of the incident.

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The information that could have been subject to unauthorized access includes name, address, Social Security number, driver's license number, financial account number, and credit card number.

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

On or about August 24, 2021, MRAG provided written notice of this incident to all affected individuals, which includes eighteen (18) 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**

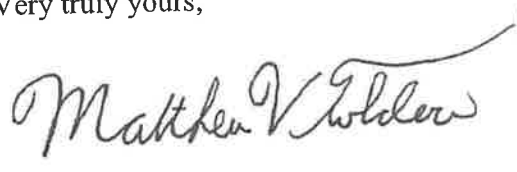
Upon discovering the event, MRAG moved quickly to investigate and respond to the incident, assess the security of MRAG systems, and notify potentially affected individuals. MRAG is also working to implement additional safeguards and training to its employees. MRAG is providing access to credit monitoring services for twelve (12) months, through Cyberman365 IDNotify, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, MRAG 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. MRAG 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,

A handwritten signature in black ink that reads "Matthew V. Toldero". The signature is written in a cursive style and is enclosed within a thin black rectangular border.

Matthew V. Toldero of  
MULLEN COUGHLIN LLC

# **EXHIBIT A**



MRAG Americas, Inc.  
8950 Martin Luther King Jr St. N, Suite 202  
St. Petersburg, FL 33702

>>Name<<  
>>Address<<  
>>Address<<  
>>Address<<  
>>Address<<

08/24/21

## RE: NOTICE OF SECURITY INCIDENT

Dear >>Name<<:

MRAG Americas, Inc. ("MRAG") is writing to inform you of an incident that may affect the security of some of your information. While we are unaware of any actual or attempted misuse of your information, we take this incident very seriously and we are providing you with information about the incident, our response to it, and resources available to you to help protect your information, should you feel it appropriate to do so.

**What Happened?** Recently, MRAG became aware of unusual activity involving an employee email account and immediately began an investigation with the assistance of third-party forensic investigators. The investigation determined that an employee email account was accessed without authorization at varying times between February 2, 2021 and February 3, 2021. Unfortunately, the available evidence did not allow us to determine what, if any, emails and attachments were viewed while the account was subject to unauthorized access.

In an abundance of caution, we completed a programmatic and manual review to determine whether sensitive information was present in the account at the time of the event. On June 7, 2021, MRAG determined that certain personal information was present in the email account at the time of the incident. We reviewed this information and our internal records to identify the individuals associated with this information and their addresses for purposes of providing notice. Through this process we determined that some of your personal information was contained in the impacted email account.

**What Information Was Involved?** Our investigation determined that at the time of the incident the email account contained information including >>Data Elements<<. To date, we are unaware of any actual or attempted misuse of your personal information as a result of this incident.

**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 promptly began an investigation using external digital forensic specialists, changed email account credentials, and investigated to confirm the security of our email network. We are also working to enhance our existing security processes and protocols.

As an added precaution, we are also offering you access to 12 months of identity monitoring services through Cyberman365 IDNotify. These services include credit monitoring and identity theft protection. If you wish to activate these identity protection services, you may follow the instructions included in the "Steps You May Take to Protect Your 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. Please review the enclosed "Steps You May Take to Protect Your Information." You can also enroll to receive the free credit monitoring and identity theft protection services we are offering.

**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, please call our dedicated assistance line on (866) 312-3451, 24 hours a day 7 days a week.

Sincerely,

A handwritten signature in cursive script that reads "Graeme Parkes". The signature is written in black ink and is positioned below the word "Sincerely,".

Dr. Graeme Parkes  
Executive Vice President  
MRAG Americas, Inc.

## STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

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

Cyberman365 IDNotify offers a full range of credit, identity theft protection, and monitoring services which are backed by \$1 million insurance. Please see the included highlight sheet for more information. To access your credit monitoring service, please use the following link to create your account using the provided redemption code.

Website: [cm365.io/mrag](http://cm365.io/mrag)

Redemption code: >>Code<<

### **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 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 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 security 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	833-395-6938
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](mailto: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 [www.oag.state.md.us](http://www.oag.state.md.us). MRAG is located at 8950 Martin Luther King Jr St. N, Suite 202, St. Petersburg, FL 33702.

*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 3 Rhode Island residents impacted by this incident.