



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

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CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302
Wayne, PA 19087

June 29, 2020

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:

Our office represents Northeast Arc, Inc. ("Northeast Arc"), located at 1 Southside Road, Danvers, MA 01923. We write on behalf of Northeast Arc to notify your office of an incident that may affect the security of some personal information relating to seventeen (17) New Hampshire residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Northeast Arc 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 January 15, 2020, Northeast Arc identified suspicious activity in an employee's email account. Northeast Arc immediately changed the employee's email credentials and launched an investigation into the incident with the assistance of third-party forensic investigators. On January 30, 2020, this investigation determined that certain Northeast Arc employee email accounts were subject to unauthorized access between January 3, 2020 and January 28, 2020. While our investigation was able to confirm access to the email account, the investigation was unable to rule out access to any emails or attachments. With the assistance of third-party forensic specialists, Northeast Arc began a lengthy and labor-intensive process to identify the sensitive information that may have been within the account which completed on June 11, 2020. Northeast Arc is providing notice to individuals whose information may have been impacted by the event. The type of personal information related to the affected New Hampshire residents includes the following: name, Social Security Number, Driver's License information and/or financial account information.

Notice to New Hampshire Residents

On or about June 29, 2020, Northeast Arc is providing written notice of this incident to all affected individuals, which includes seventeen (17) New Hampshire residents. A sample of the letter is attached hereto and labeled as *Exhibit A*.

Other Steps Taken and To Be Taken

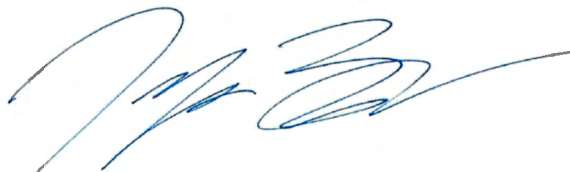
Upon discovering the event, Northeast Arc moved quickly to investigate and respond to the incident, assess the security of Northeast Arc systems, and notify potentially affected individuals. Northeast Arc is also working to implement additional safeguards and training to its employees. Northeast Arc is providing affected individuals whose personal information was potentially affected by this incident with access to twenty four (24) months of credit monitoring services through IDExperts at no cost to these individuals.

Additionally, Northeast Arc 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. Northeast Arc 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. Northeast Arc is also reporting this matter to 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 267-930-4784.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Jeff Boogay', with a long horizontal flourish extending to the right.

Jeff Boogay of
MULLEN COUGHLIN LLC

Enclosure
JJB/mwj

EXHIBIT A



C/O ID Experts
10300 SW Greenburg Rd. Suite 570
Portland, OR 97223

To Enroll, Please Call:
(800) 939-4170
Or Visit:
<https://app.myidcare.com/account-creation/protect>
Enrollment Code: <<XXXXXXXX>>

<<First Name>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip>>

June 29, 2020

Re: Notice of Data Breach

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

Northeast Arc is writing to inform you of a recent event that may impact the privacy of some of your personal information. While we are unaware of any attempted or actual misuse of your information, we are providing you with information about the event, our response, and steps you may take to protect against any misuse of your information, should you feel it is necessary to do so.

What Happened? On January 15, 2020, Northeast Arc identified suspicious activity in an employee’s email account. Northeast Arc immediately changed the employee’s email credentials and began an investigation into the incident with the assistance of third-party forensic investigators. On January 30, 2020, this investigation determined that certain Northeast Arc employee email accounts were subject to unauthorized access between January 3, 2020 and January 28, 2020. While our investigation was able to confirm access to the email account, the investigation was unable to rule out access to any emails or attachments. As a result, with the assistance of third-party forensic specialists, Northeast Arc began a lengthy and labor-intensive process to identify the sensitive information that may have been within the account.

The forensic investigator completed its time-consuming analysis of the contents of the email accounts on April 8, 2020 and prepared a list of potentially impacted individuals whose information was determined to be present in the emails or attachments possibly viewed by the unauthorized person. Northeast Arc then searched its internal records to locate the addresses for the potentially affected individuals. That process was completed on June 11, 2020.

What Information Was Involved? The information in the email account at issue included your: Name, <<Impacted information>>. We have no evidence that your information was subject to actual or attempted misuse.

What We Are Doing. We take this incident and the security of your personal information seriously. Upon discovery, we immediately took steps to secure the impacted account. We are reviewing our policies, procedures, and processes related to storage and access to personal information. We will also notify regulators, including the United States Department of Health and Human Services of this incident, as required by law.

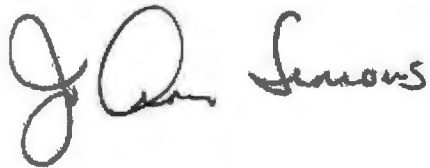
As an added precaution, we are also offering 24 months of complimentary access to credit monitoring, fraud consultation, and identity theft restoration services through ID Experts. Individuals who wish to receive these services must enroll by following the attached enrollment instructions.

What You Can Do. You can review the enclosed *Steps You Can Take to Protect Your Information* to learn helpful tips on steps you can take to protect against possible misuse should you feel it appropriate to do so. We also encourage you to review your account statements, health insurance account records, and explanation of benefits forms for suspicious activity, and report all suspicious activity to the institution that issued the record immediately.

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 contact our dedicated call center at (800) 939-4170, 6 am - 5 pm Pacific Time, Monday through Friday. You may also write to Northeast Arc at Attn: Susan Brady, 1 Southside Road, Danvers, MA 01923.

We sincerely regret any inconvenience or concern this incident has caused.

Sincerely,

A handwritten signature in black ink that reads "Jo Ann Simons". The signature is written in a cursive style with a large, looped initial "J".

Jo Ann Simons
President and CEO

Steps You Can Take to Protect Your Information

Enroll in Credit Monitoring

We encourage you to contact ID Experts with any questions and to enroll in free MyIDCare services by calling (800) 939-4170 or going to <https://app.myidcare.com/account-creation/protect> and using the Enrollment Code provided above. MyIDCare experts are available Monday through Friday from 6 am - 5 pm Pacific Time. Please note the deadline to enroll is September 26, 2020.

Monitor Your Accounts.

To protect against the possibility of identity theft or other financial loss, we encourage you to remain vigilant, to review your 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 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

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

www.transunion.com/credit-freeze

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

www.equifax.com/personal/credit-report-services

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

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-680-7289

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

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.identitytheft.gov; 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.

For Maryland residents, the Attorney General can be contacted by mail at 200 St. Paul Place, Baltimore, MD, 21202; toll-free at 1888-743-0023; by phone at (410) 576-6300; consumer hotline (410) 528-8662; and online at 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 violators. 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, 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 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/>. **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. **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, 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 <<XX>> Rhode Island residents impacted by this incident. This notice has not been delayed by a law enforcement investigation.