



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

APR 10 2020

CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302
Wayne, PA 19087

April 06, 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:

We represent NS Leasing, LLC (“NS Leasing”), 747 Pine Street, Suite 201, Burlington, VT 05401 and are writing to notify you of an incident that may affect the security of the personal information of certain New Hampshire residents. The investigation into this event is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to this submission. By providing this notice, NS Leasing does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Nature of the Data Event

On October 8, 2019, NS Leasing became aware of suspicious activity relating to an employee email account. In response, NS Leasing worked with outside forensic specialists to investigate the nature and scope of the activity. The investigation determined the employee email account was logged into without authorization by an unknown intruder between October 16 and October 30, 2019. Although the investigation was unable to determine whether any information contained in email messages or file attachments stored in the email accounts was actually viewed or taken by the actor, that type of activity cannot be ruled out. In an abundance of caution, NS Leasing performed a thorough review of the information contained within the impacted email accounts and, on January 31, 2020, learned the identities of the potentially impacted individuals and types of personal information. NS Leasing continued to work to find contact information for these individuals through February 27, 2020.

The types of personal information impacted vary by individual. However, NS Leasing’s investigation determined the types of personal information impacted for New Hampshire residents includes Name, Social Security Number, Driver’s License Number, and Financial Account Information.

Notice to New Hampshire Residents

NS Leasing began mailing written notice of this incident to one hundred and eight (108) New Hampshire residents on April 6, 2020, in substantially the same form as the letter attached hereto as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon learning of the event, NS Leasing investigated to determine those individuals who were potentially affected and secured the email account by updating all employee passwords and implementing multi-factor authentication for email account logins.

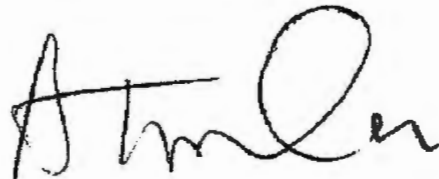
As an added precaution, NS Leasing is offering impacted New Hampshire residents access to twelve (12) months of free credit monitoring and identity protection services through Experian for individuals with impacted Social Security numbers and driver's license numbers. NS Leasing is also providing impacted New Hampshire residents with guidance on how to better protect against identity theft and fraud. Such guidance includes information on how to place a fraud alert and security freeze on one's credit file, contact details for the national consumer reporting agencies, information on how to obtain a free credit report, reminders to remain vigilant for incidents of identity theft and fraud by reviewing account statements and monitoring free credit reports, and recommendations regarding how to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

NS Leasing is also notifying other state regulators and the three major credit reporting agencies about this incident, as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4801.

Very truly yours,

A handwritten signature in black ink, appearing to read "A. Walker", written in a cursive style.

Alexander T. Walker of
MULLEN COUGHLIN LLC

ATW/amw
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

April 6, 2020



F4318-L01-0000001 P001 T00001 *****ALL FOR AADC 159
SAMPLE A SAMPLE - STANDARD
123 ANY STREET
ANYTOWN, US 12345-6789



Re: Notice of Data breach

Dear Sample A Sample:

NS Leasing, LLC (“NS Leasing”) is writing in follow up regarding a recent incident involving an employee’s email account. We want to provide you with information about the incident, our response, and steps you may take to better protect against possible misuse of your personal information, should you feel it necessary to do so.

What Happened? NS Leasing became aware of suspicious activity relating to an employee email account. In response, NS Leasing worked with outside forensics specialists to investigate the nature and scope of the activity. The investigation determined the employee email account was logged into without authorization by an unknown intruder between October 16 and October 30, 2019. Although the investigation was unable to determine whether any information contained in email messages or file attachments stored in the email accounts was actually viewed or taken by the actor, that type of activity cannot be ruled out. In an abundance of caution, NS Leasing performed a thorough review of the information contained within the email account and on January 31, 2020, determined that your personal information was potentially accessible by the unauthorized actor.

What Information was Involved? The investigation determined that the following types of your personal information were potentially subject to unauthorized access within the impacted email account: your name and Social Security Number. At this time, NS Leasing is unaware of any actual or attempted misuse of personal information in relation to this incident.

What We Are Doing. The security of personal information within our care is among our highest priorities. Upon learning of the event, we investigated to determine the nature and scope of the activity, and secured the email account by updating all employee passwords and implementing multi-factor authentication for email account logins. We will be taking additional steps to improve security and better protect against similar incidents in the future.

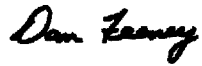
As an added precaution, NS Leasing is offering you access to ## months of free credit monitoring and identity protection services through Experian at no cost to you. Details of this offer and instructions on how to enroll in the services are enclosed within this letter.



What You Can Do. Please review the enclosed *Steps You Can Take to Protect Against Identity Theft and Fraud*, which contains information on what you can do to better protect against possible misuse of your information.

For More Information. We understand you may have questions that are not answered in this letter. If you have questions or concern regarding this incident, please call (844) 933-2743.

Sincerely,



Daniel Feeney
Chief Executive Officer
NS Leasing, LLC

Steps You Can Take to Protect Against Identity Theft and Fraud

Enroll in Identity Monitoring

To help protect your identity, we are offering a complimentary ##-months membership of Experian's® IdentityWorksSM. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: 06/30/2020** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll:
<https://www.experianidworks.com/credit>
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **(844) 933-2743** by **06/30/2020**. Be prepared to provide engagement number **ENGAGE#** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR ##-MONTHS EXPERIAN IDENTITYWORKS MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance†:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at **(844) 933-2743**. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

* Offline members will be eligible to call for additional reports quarterly after enrolling.

† The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.



Please note that this Identity Restoration support is available to you for one year from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

Monitor Your Accounts

In addition to enrolling in the above offered services, 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. 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.

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 19016
1-888-909-8872

www.transunion.com/credit-freeze

Equifax

PO Box 105788
Atlanta, GA 30348-5788
1-800-685-1111

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.

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 19106
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

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, 1-877-ID-THEFT (1-877-438-4338); 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 Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-410-528-8662, 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 1-919-716-6000, www.ncdoj.gov. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

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, 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are twenty-one Rhode Island residents impacted by this incident.

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_cfbp_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/>.

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