



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED
NOV 22 2021
CONSUMER PROTECTION

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609 SW 8th Street, Suite 600
Bentonville, AR 72712

November 17, 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 Onset Computer Corporation (“Onset”) located at 470 MacArthur Blvd., Bourne, MA 02532, and are writing to notify your office of an incident that may affect the security of some personal information relating to one (1) New Hampshire resident. 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, Onset 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 or about July 12, 2021, Onset learned of suspicious activity on its computer network. Onset immediately secured its network and launched an investigation with the assistance of third-party computer specialists to determine the nature and scope of the incident. On August 18, 2021, the investigation determined that certain files on Onset’s systems were subject to unauthorized acquisition. Onset then undertook a diligent and comprehensive review of the contents of these files in order to determine whether they contained sensitive information. On October 27, 2021, the review was completed, and Onset confirmed that certain information related to certain individuals may have been impacted.

The information that could have been subject to unauthorized access includes name, address and social security number

Notice to New Hampshire Resident

On or about November 17, 2021, Onset provided written notice of this incident to all affected individuals, which includes one (1) New Hampshire resident. 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, Onset moved quickly to investigate and respond to the incident, assess the security of Onset systems, and notify potentially affected individuals. Onset is also working to implement additional safeguards and training to its employees. Onset is providing access to credit monitoring services for one (1) year, through TransUnion, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Onset 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. Onset is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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.

Onset also reported the matter to law enforcement and will cooperate with any investigation.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-1613.

Very truly yours,

Katie L. Butler

Katie Butler of
MULLEN COUGHLIN LLC

KLB/eks
Enclosure

NH DEPT OF JUSTICE
NOV 22 2021 PM 1:24

EXHIBIT A



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<MailID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

NOTICE OF <<SECURITY INCIDENT / DATA BREACH>>

Dear <<Name 1>>:

Onset Computer Corporation (“Onset”) writes to notify you of a recent incident that may impact the privacy of some of your information. 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? On July 12, 2021, Onset learned of suspicious activity on its computer network. We immediately secured our network and launched an investigation with the assistance of third-party computer specialists to determine the nature and scope of the incident. On August 18, 2021, the investigation determined that certain files on Onset’s systems were subject to unauthorized acquisition. We then undertook a diligent and comprehensive review of the contents of these files in order to determine whether they contained sensitive information. On October 27, 2021, the review was completed, and Onset confirmed that certain files containing your information were in the impacted files, so your information could have been accessed.

What Information Was Involved? The information that may have been impacted by this incident includes your <<Breach Elements>> and name. At this time, we have no indication that your information was subject to actual or attempted misuse as a result of this incident.

What We Are Doing. Onset takes this incident and security of your information seriously. Upon discovering this incident, we immediately took steps to review and reinforce the security of our computing environment. We are reviewing our security policies, procedures, and processes, and additional workforce training is being conducted to reduce the likelihood of a similar future incident. We also reported the incident to law enforcement and will cooperate with any investigation, and we will notify applicable regulatory authorities, as required by law.

As an added precaution, we are also offering <<Enrollment Length>> of complimentary access to credit monitoring services through TransUnion. Individuals who wish to receive these services must enroll by following the enrollment instructions found in the enclosed *Steps You Can Take to Help Protect Personal Information*.

What You Can Do. We encourage you to remain vigilant against identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. You can find out more about how to protect your information in the enclosed *Steps You Can Take to Help Protect Personal Information*. There you will also find more information on the credit monitoring services we are offering and how to enroll.

For More Information. We understand you may have questions about this incident that are not addressed in this letter. If you have additional questions, or need assistance, please call us at 855-675-3147, between the hours of 9:00 a.m. and 9:00 p.m. EST.

We take this incident very seriously and sincerely regret any inconvenience or concern this incident caused you.

Sincerely,

Laurie Colwell
Chief Human Resources Officer
Onset Computer Corporation

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

Complimentary Credit Monitoring Service

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (myTrueIdentity) for <<CM Length>> provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies.

To enroll in this service, go directly to the myTrueIdentity website at www.mytrueidentity.com and in the space referenced as “Enter Activation Code”, enter the following unique 12-letter Activation Code <<Enrollment Code>> and follow the three steps to receive your credit monitoring service online within minutes.

If you do not have access to the Internet and wish to enroll in a similar offline, paper based, credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at 1-855-288-5422. When prompted, enter the following 6-digit telephone pass code <<Engagement Number>> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and <<Enrollment Deadline>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion, or an address in the United States (or its territories) and a valid Social Security number, or are under the age of 18. Enrolling in this service will not affect your credit score.

Once you are enrolled, you will be able to obtain <<CM Length>> of unlimited access to your TransUnion credit report and credit score. The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The subscription also includes access to identity restoration services that provides assistance in the event your identity is compromised to help you restore your identity and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

If you have questions about your online credit monitoring benefits, need help with your enrollment, or need help accessing your credit report, or passing identity verification, please contact the myTrueIdentity Customer Service Team toll-free at: 1-844-787-4607, Monday-Friday: 8am-9pm, Saturday-Sunday: 8am-5pm Eastern time.

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 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:

| Equifax | Experian | TransUnion |
|---|---|---|
| https://www.equifax.com/personal/credit-report-services/ | https://www.experian.com/help/ | https://www.transunion.com/credit-help |
| 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; 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.

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.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; 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 4 Rhode Island residents impacted by this incident.