



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

JAN 14 2021

CONSUMER PROTECTION

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

January 5, 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 Paddock Publications, Inc. ("Paddock") located at 95 W Algonquin Rd. Ste 300 Arlington Heights, IL 60005, United States, and write to notify your office of an incident that may affect the security of some personal information relating to approximately five (5) 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, Paddock 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 July 21, 2020, Paddock became aware of suspicious activity within its computer network. Paddock immediately began an investigation to determine the nature and scope of the activity. The investigation determined that certain files within the Paddock environment were encrypted and inaccessible. As part of its investigation, Paddock worked with third party forensic specialists. Through this investigation, the forensic investigators determined that certain files were accessible to unknown actors and may have been removed from the Paddock environment prior to the encryption of its systems. These files included individuals' full name, and Social Security number.

The forensic investigator then undertook a time-consuming review of all the files stored on the impacted portion of the network to determine whether they contained any sensitive information. On or around October 27, 2020 the investigation determined that the files at issue may have contained personal information. However, this list did not have address information for all impacted individuals, including. Thereafter, Paddock and a third-party vendor conducted a review of internal and external resources to locate the missing addresses so these individuals could be notified. This additional review was completed on December 18, 2020.

Notice to New Hampshire Residents

On or about January 5, 2021, Paddock provided written notice of this incident to potentially affected individuals, which includes approximately five (5) 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, Paddock moved quickly to investigate and respond to the incident, assess the security of Paddock's systems, and notify potentially affected individuals. Paddock is also working to implement additional safeguards and training to its employees. Paddock is providing access to credit monitoring services for one (1) year, through Experian's IdentityWorks service, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Paddock is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including 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. Paddock will also be reporting this incident to other appropriate state regulators.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4786.

Very truly yours,

A handwritten signature in blue ink that reads "Ryan Loughlin". The signature is written in a cursive style with a small flourish at the end.

Ryan C. Loughlin of
MULLEN COUGHLIN LLC

RCL: mef
Enclosure

EXHIBIT A

Paddock Publications, Inc.

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

January 5, 2021



G0953-L01-0000001 T00017 P003 *****ALL FOR AADC 123
SAMPLE A SAMPLE - L01 STANDARD
APT ABC
123 ANY ST
ANYTOWN, US 12345-6789



RE: Notice of Data Breach

Dear Sample A Sample:

Paddock Publications, Inc. (“Paddock”) is writing to notify you of a recent incident that may have impacted the security of your personal information. We want to provide you with information about the incident, our response, and steps you may take to better protect your personal information, should you feel it necessary to do so.

What Happened? On July 21, 2020, Paddock became aware of suspicious activity within its computer network. Paddock immediately began an investigation to determine the nature and scope of the activity. Our investigation determined that certain files within our environment were encrypted and inaccessible. As part of our investigation, we worked with third party forensic specialists. Through this investigation, the forensic investigators determined that certain files were accessible to unknown actors and may have been removed from our environment prior to the encryption of our systems. The forensic investigator then undertook a time-consuming review of all the files stored on the impacted portion of the network to determine whether they contained any sensitive information. On or around October 27, 2020 the investigation determined that the files at issue may have contained personal information related to you.

What Information was Involved? The investigation confirmed that the following information related to you was stored within one of the impacted files: your name, [Extra1 - data elements].

What We Are Doing. The confidentiality, privacy, and security of personal information within our custody is among Paddock’s highest priorities. Upon learning of the event, we launched an investigation with the assistance of forensic specialists to determine what systems and information may be impacted by this event. We also took steps to further secure our network and we are working to rebuild our network from the ground up to better protect against similar incidents in the future.

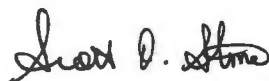
What You Can Do. Please review the enclosed *Steps You Can Take to Protect Personal Information*, which contains information on what you can do to better protect against possible misuse of your information.



As an added precaution, Paddock is offering you access to one year of credit monitoring and identity protection services provided by Experian's® IdentityWorksSM at no cost to you. Details of this offer and instructions on how to enroll in the services are enclosed within this letter.

For More Information. We understand you may have questions that are not answered in this letter. If you have questions, please call our dedicated hotline at (866) 274-4371, Monday – Friday 6 a.m. to 6 p.m. PST and Saturday/ Sunday 8 a.m. to 5 p.m. PST, excluding national holidays.

Sincerely,



Scott Stone
President/Chief Operating Officer



STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring and Identity Restoration Services

To help protect your identity, we are offering a complimentary one-year 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 February 28, 2021** (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 (866) 274-4371 by February 28, 2021. Be prepared to provide engagement number **DB24289** as proof of eligibility for the identity restoration services by Experian.

Monitor Your Accounts

In addition to enrolling in the complimentary services detailed above, we encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements and explanation of benefits, and to monitor your credit reports for suspicious activity and to detect errors. 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 P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	TransUnion P.O. Box 2000 Chester, PA 19016 1-888-909-8872 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
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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 9554 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
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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, 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. This notice has not been delayed by law enforcement.

California Residents: Visit the California Office of Privacy Protection (www.oag.ca.gov/privacy) for additional information on protection against identity theft. **Kentucky Residents:** Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov, Telephone: 1-502-696-5300. **Maryland Residents:** Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023. **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 a 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. You can 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. **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/>. **North Carolina Residents:** Office of the Attorney General of North Carolina, Consumer Protection Division, 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 1-919-716-6400, 877-566-7226 (toll free within NC). **Oregon Residents:** Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392. **Rhode Island Residents:** Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, Telephone: 401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are two Rhode Island residents impacted by this incident. **Washington D.C. Residents:** the Office of Attorney General for the District of Columbia can be reached at: 441 4th Street NW, Suite 1100 South, Washington, D.C. 20001; 1-202-442-9828; <https://oag.dc.gov>.