



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

STATE OF NH
DEPT OF JUSTICE
2020 NOV -9 PM 3:02

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

November 4, 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 Penn United Technologies (“Penn United”) located at 799 North Pike Road Cabot, Pa. 16023, and are writing to notify your office of an incident that may affect the security of some personal information relating to six (6) New Hampshire residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Penn United 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 September 23, 2020, Penn United discovered that certain systems in its environment were inaccessible. Penn United immediately launched an investigation with the assistance of a third-party forensic investigator to determine the full nature and scope of what occurred. Through this investigation, Penn United determined that an unknown actor gained access to certain Penn United systems and that certain files were viewed and/or taken by the unknown actor. Evidence suggests this information may have been compromised between September 15, 2020 and September 23, 2020. Penn United conducted an internal inquiry to determine what information may have been present in those files, and to whom that information belongs.

The information that could have been subject to unauthorized access includes name, address, social security number, driver’s license number and bank account information.

Notice to New Hampshire Residents

On October 15, 2020, Penn United began providing written notice of this incident to potentially affected employees and their employees and spouses. No residents of New Hampshire were notified in the initial notification round. Penn United continued to diligently review its internal files to obtain accurate contact information for additional potentially affected employees and their employees and spouses and also utilized the services of a third-party vendor to obtain missing address information. On November 4, 2020, Penn United provided written notice to additional individuals, which includes six (6) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*. Penn United expects to send a third wave of notices in the near future, once additional address information is collected, and will update your office if necessary.

Other Steps Taken and To Be Taken

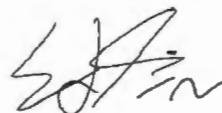
Upon discovering the event, Penn United moved quickly to investigate and respond to the incident, assess the security of Penn United systems, and notify potentially affected individuals. Penn United is also working to implement additional safeguards and training to its employees. Penn United is providing access to credit monitoring services for one (1) year, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals. Penn United also notified federal law enforcement and is working with them to support their investigation.

Additionally, Penn United 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. Penn United 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) 930-4776.

Very truly yours,



Edward J. Finn of
MULLEN COUGHLIN LLC

EXHIBIT A

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

November 4, 2020



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SAMPLE A SAMPLE - L01 INDIVIDUAL
APT 123
123 ANY ST
ANYTOWN, US 12345-6789



Dear Sample A Sample:

Penn United Technologies, Inc. (“Penn United”) is writing to notify you of a recent incident that may affect the security of some of your personal information. This letter provides details of the incident, our response, and resources available to you to help protect your information, should you feel it is appropriate to do so.

What Happened? On September 23, 2020, Penn United discovered that certain systems in its environment were inaccessible. We immediately launched an investigation with the assistance of a third-party forensic investigator to determine the full nature and scope of what occurred. Through this investigation, we determined that an unknown actor gained access to certain Penn United systems and that certain files were viewed and/or taken by the unknown actor. Evidence suggests this information may have been compromised between September 15, 2020 and September 23, 2020. Penn United conducted an internal review to determine what information may have been present in those files, and to whom that information belongs. Penn United then worked quickly to identify contact information and put in place resources to assist you.

Why Are You Getting This Letter? We determined that your information was on our network at the time of the incident and may have been acquired by an unauthorized user.

What Information Was Involved? Through our investigation, we determined that the following types of your information may have been impacted by this incident: name, social security number, driver’s license number and bank account information.

What We Are Doing. The confidentiality, privacy, and security of information in our care is one of our highest priorities. Upon discovering this incident, Penn United reset passwords, immediately started an investigation, and took steps to further secure our systems. We are also notifying necessary regulatory entities. We are notifying potentially impacted individuals, including you, so that you may take further steps to best protect your personal information, should you feel it is appropriate to do so. Although we do not have any evidence that identity theft or fraud occurred as a result of this incident, we are offering identity theft protection services through Experian for twelve (12) months at no cost to you as an added precaution.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud, review your account statements, and monitor your credit reports for suspicious activity and to detect errors. Additional information and resources are included in the enclosed “Steps You May Take To Help Protect Personal Information.” You may also enroll in the complimentary credit monitoring services available to you.

MANUFACTURING SOLUTIONS. ABSOLUTE INTEGRITY. EMPLOYEE OWNED.

Manufacturing Solutions for Energy, Oil & Gas, Medical, Defense & Aerospace, Fluid Handling, Automotive, Connectivity, and Other
Markets Demanding Precision Components and Tooling
ISO 9001, FDA Registered. ITAR Registered

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For More Information. We understand you may have questions that are not answered in this letter. If you have questions, please email us at Security@pennunited.com and we will respond to your questions via email or please contact our dedicated assistance line at (724)352-1507 Ext 4727, Monday through Friday, between 10:00 a.m. and 4:00 p.m. EST. If we are assisting other callers when you call us, please leave a detailed message and we will return the call. Protecting your information is important to us, and Penn United remains committed to safeguarding the information in our care.

Sincerely,

Bill Jones
President
Penn United Technologies, Inc.

STEPS YOU MAY TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

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: 01/31/2021** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- 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 877.890.9332 by **01/31/2021**. Be prepared to provide engagement number **ENGAGE** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH 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, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** 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 877.890.9332. 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).

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.

** 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.*

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Monitor Your Accounts

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 listed below 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 160
Woodlyn, PA 19094
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

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, 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, 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

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); 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.

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 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 is one (1) Rhode Island resident impacted by this incident.

