

RECEIVED

OCT 29 2021

CONSUMER PROTECTION



MULLEN  
COUGHLIN<sub>LLC</sub>  
ATTORNEYS AT LAW

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October 25, 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 Personal Legal Plans, Inc. and Personal Legal Plans of GA, Inc. ("Personal Legal Plans") located at 5821 Fairview Road, Suite G9, Charlotte, North Carolina 28209, and are writing to notify your office of an incident that may affect the security of some personal information relating to two (2) New Hampshire residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Personal Legal Plans 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 August 31, 2021, Personal Legal Plans became aware that certain files on its computer system were encrypted with malware by an unknown actor. Personal Legal Plans promptly took steps to secure the impacted systems and its network and launched an investigation to determine the nature and scope of the event. On September 27, 2021, the investigation concluded determining that the unauthorized actor may have had access to certain current and former employee and client information files within these systems.

The information that could have been subject to unauthorized access includes name, Social Security number, and financial account information.

### **Notice to New Hampshire Residents**

On or about October 25, 2021, Personal Legal Plans provided written notice of this incident to all affected individuals, which includes two (2) 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, Personal Legal Plans moved quickly to investigate and respond to the incident, assess the security of Personal Legal Plans systems, and notify potentially affected individuals. Personal Legal Plans is also working to implement additional safeguards and training to its employees. Personal Legal Plans 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.

Additionally, Personal Legal Plans 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. Personal Legal Plans 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.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-1697.

Very truly yours,



Amanda Harvey of  
MULLEN COUGHLIN LLC

ANH/eyl  
Enclosure

# EXHIBIT A

[LOGO]

<<Return Mail Address>>

<<Name 1>> <<Name 2>>

<<Address 1>>

<<Address 2>>

<<Date>>

<<City>>, <<State>> <<Zip>>

<<Country>>

**Re: Notice of [Security Incident] [Data Breach]**

Dear <<Name 1>> <<Name 2>>:

Personal Legal Plans, Inc. and Personal Legal Plans of GA, Inc. ("Personal Legal Plans") is writing to inform you of an event that may impact some of your information. While there is no evidence of any attempted or actual misuse of your information, we are providing you with information about this event, our response, and the steps you may take to further protect your information against identity theft and fraud, should you feel it necessary to do so.

**What Happened?** On August 31, 2021, Personal Legal Plans became aware that certain files on its computer system were encrypted with malware by an unknown actor. Personal Legal Plans promptly took steps to secure the impacted systems and its network and launched an investigation to determine the nature and scope of the event. On September 27, 2021, the investigation concluded determining that the unauthorized actor may have had access to certain current and former employee and client information files within these systems.

**What Information Was Involved?** Out of an abundance of caution, we are notifying you because our investigation determined that certain information related to you may have been impacted. This information includes your name, Social Security number, and financial account information.

**What We Are Doing.** The privacy and security of your information is among our highest priorities and we take this incident very seriously. Personal Legal Plans is reviewing its security policies and procedures to reduce the risk of this happening in the future and implemented additional measures and security tools to further protect information in our systems. Personal Legal Plans is also working to provide additional training to employees regarding data privacy and security. While we do not have any indications that fraud or identity theft has occurred as a result of this incident, we are offering [twelve (12)] [twenty-four (24)] months of complementary credit monitoring through Experian as an added precaution. We also reported this incident to federal law enforcement and are notifying state regulators, as required.

**What You Can Do.** We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity. Additional information and resources are included in the enclosed *Steps You Can Take to Help Protect Your Information*. You may also enroll in the complementary credit monitoring available to you at no cost. Enrollment instructions are attached to this letter.

**For More Information.** If you have additional questions, please call us at <<XXX-XXX-XXXX>> between the hours of X:00 a.m. and X:00 p.m. You may also write to Personal Legal Plans at 5821 Fairview Road, Suite G9, Charlotte, North Carolina 28209.

We sincerely regret any inconvenience or concern this incident may cause.

Sincerely,

<<SIGNATURE>>

[Name]

[Title]

Personal Legal Plans, Inc. and Personal Legal Plans of GA, Inc.

## STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

### Enroll in Credit Monitoring and Identity Restoration Services

To help protect your identity, we are offering a complimentary \_\_-month membership of Experian's® IdentityWorks<sup>SM</sup>. 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: December 31, 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: [code]**

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 **December 31, 2021**. Be prepared to provide engagement number B019512 as proof of eligibility for the identity restoration services by Experian.

### **ADDITIONAL DETAILS REGARDING YOUR \_\_-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 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<sup>TM</sup>:** 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<sup>\*\*</sup>:** 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 12/24 months 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](http://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.

### 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](http://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 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 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 security 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:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/help/">https://www.experian.com/help/</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
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](http://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 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](http://www.ncdoj.gov).