

RECEIVED

MAY 22 2020

CONSUMER PROTECTION



MULLEN
COUGHLIN_{LLC}
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1275 Drummers Lane, Suite 302
Wayne, PA 19087

May 18, 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 Prime Communications (“Prime”), located at 12550 Reed Road, Suite 100, Sugar Land, Texas 77478, and write to notify your Office of a data incident that may affect the privacy of some personal information relating to approximately sixty-four (64) 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, Prime 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 April 27, 2020, Prime became aware of a situation in which a former Prime employee inadvertently received an email with a file containing information related to other Prime employees. Upon learning of this incident, Prime immediately began investigating to understand what happened and the scope of potentially affected information. The investigation determined that the file, which included information related to current and former Prime employees, was inadvertently sent via email to one (1) former Prime employee on December 11, 2019. Prime has no evidence indicating that the information contained within the file has been released publicly or otherwise disclosed beyond this former employee, nor has the investigation found evidence that this information has been subject to actual or attempted misuse. It was determined that the information present in the file that was inadvertently disclosed included the following: name, Social Security number, and date of birth.

Notice to New Hampshire Residents

On or about May 18, 2020, Prime will begin providing written notice of this incident to individuals whose information was present in the inadvertently disclosed file, which includes approximately sixty-four (64) New Hampshire residents. Written notice to the New Hampshire residents is being provided in substantially the same form as the letter attached here as *Exhibit A*.

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Other Steps Taken and To Be Taken

Prime takes its responsibility to safeguard employee information very seriously. Prime responded immediately to this event and has been working diligently to provide notice of the incident to the individuals involved and to put resources in place to assist them in safeguarding their information. As part of its ongoing commitment to the privacy and security of personal information in its care, Prime is also reviewing its existing policies and procedures and implementing enhanced employee training protocols. Out of an abundance of caution, Prime is providing the potentially impacted New Hampshire residents with complimentary access to credit monitoring and identity restoration services for twelve (12) months through Kroll.

Additionally, Prime is providing potentially impacted individuals guidance on how to better protect against the potential misuse of personal information and encouraging them to remain vigilant against identity theft and fraud by monitoring accounts and credit reports. Prime is also providing individuals with information on how to place a fraud alert and security freeze on their credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, 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) 930-4773.

Very truly yours,



M. Alexandra Belton of
MULLEN COUGHLIN LLC

MABB:mcm

Exhibit A



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country >>

RE: Notice of <<b2b_text_1(HeadingVtext)>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

We write to provide you with information on a recent incident that may affect the privacy of some of your personal information. While we are unaware of any actual or attempted misuse of your information, we are providing you with notice of the incident, steps we are taking in response, and resources available to help you better protect your information, should you feel it is appropriate to do so.

What Happened? On April 27, 2020, we became aware of a situation in which a former Prime employee inadvertently received an email with a file containing information related to other Prime employees. Upon learning of this incident, we immediately began investigating to understand what happened and the scope of potentially affected information. Our investigation determined that the file included your information and was inadvertently sent via email to one (1) former Prime employee on December 11, 2019. We have no evidence indicating that your information has been released or otherwise disclosed beyond this former employee or to the general public.

What Information Was Involved? The information present in the file included your name, Social Security number, and date of birth.

What We Are Doing. We take our responsibility to safeguard employee information very seriously. We responded immediately to this event and have been working diligently to provide you with notice of the incident and to put resources in place to assist you in safeguarding your information. As part of our ongoing commitment to the privacy and security of personal information in our care, we are reviewing our existing policies and procedures and implementing enhanced employee training protocols. We are also providing notice of this incident to you and to state regulators where required.

Out of an abundance of caution, we are providing you with twelve (12) months of complimentary access to identity monitoring services through Kroll, as well as guidance on how to help safeguard your information, should you feel it appropriate to do so. While Prime is covering the cost of these services, you will need to complete the activation process yourself. Information on how to activate identity monitoring services may be found in the enclosed *Steps You Can Take to Help Protect Personal Information*.

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 credit reports for suspicious activity and to detect errors. Please also review the enclosed *Steps You Can Take to Help Protect Personal Information*.

For More Information. We understand you may have questions about this incident that are not addressed in this letter. To ensure your questions are answered in a timely manner, we established a dedicated assistance line at [1-800-833-8333](tel:1-800-833-8333), which can be reached Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time, excluding U.S. holidays. You may also write to us directly at: 12550 Reed Road, Suite 100, Sugar Land, Texas 77478.

We take the protection of the privacy and security of personal information in our care very seriously. We sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

Gabrielle Moses

Gabrielle Moses

Vice President of Human Resources

Prime Communications

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Activating Identity Monitoring Services

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for twelve (12) months. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit [https://\[IDMonitoringURL\]](https://[IDMonitoringURL]) to activate and take advantage of your identity monitoring services.

You have until [\[Date\]](#) to activate your identity monitoring services.

Membership Number: <<Member ID>>

Additional information describing your services is included with this letter.

Monitor 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 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 19094

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 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 fraud alerts, security freezes, and the steps you can take to protect yourself and prevent identity theft 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 Maryland 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 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 violators. 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/ff/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.

For New York residents, the New York Attorney General provides resources regarding identity theft protection and security breach response at www.ag.ny.gov/internet/privacy-and-identity-theft. The New York Attorney General can be contacted by phone at 1-800-771-7755, toll-free at 1-800-788-9898, and online at www.ag.ny.gov.

For North Carolina residents, the North Carolina Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6000, or www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General can be contacted at 150 South Main Street, Providence, Rhode Island 02903; www.riag.ri.gov, or 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-six \(26\) Rhode Island residents impacted by this incident.](#)

All US residents: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, www.consumer.gov/idtheft, 1-877-IDTHEFT (438-4338), TTY: 1-866-653-4261.

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services¹ from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

¹ Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.