RECEIVED

MAY 16 2023

CONSUMER PROTECTION

MULLEN COUGHLIN LLC
ATTORNEYS AT LAW

3001 N. Rocky Point Drive East, Suite 200
Tampa, FL 33607

May 12, 2023

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

To Whom It May Concern:

We represent Retirement Clearinghouse, located at 1916 Ayrsley Town Blvd., Ste. 200, Charlotte, NC 28273, and write to notify your office of an event that may affect certain information related to approximately eighty two (82) New Hampshire residents. This notice may be supplemented if any new, material facts are learned subsequent to its submission. By providing this notice, Retirement Clearinghouse 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

Retirement Clearinghouse assists organizations with transferring individuals' retirement savings to reduce 401(k) cashouts and increase financial wellness. This process involves collecting information about the individuals from organizations to facilitate the transfers.

On or about March 15, 2023, Retirement Clearinghouse identified potentially suspicious activity for one (1) email account, and promptly took steps to confirm the security of the account. Retirement Clearinghouse began an investigation and, in the interim, notified a potentially affected organization on March 18, 2023. On March 28, 2023, the investigation confirmed certain data in the account may have been at risk of access without authorization. Retirement Clearinghouse undertook a comprehensive review of the data to determine its contents, and issued supplemental notification to the organization on April 11, 2023, identifying that some identified in the reviewed files. The organization conducted its review of this matter, including a request for data,

which was furnished to the organization on April 28, 2023. After review, the organization issued supplemental data to Retirement Clearinghouse in furtherance of completing the investigation of this matter and notifying individuals, which was complete on or about May 3, 2023.

Notice to New Hampshire Residents

On or about May 12, 2023, Retirement Clearinghouse began providing written notice of this event to approximately eighty two (82) 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 identifying the event, Retirement Clearinghouse began an investigation to assess the scope of the event, the security of the information, and identify potentially affected data owners and/or individuals. Retirement Clearinghouse is also evaluating additional safeguards to mitigate recurrence of this type of event. Further, Retirement Clearinghouse is providing access to credit monitoring services for twelve (12) months, through Experian to individuals whose information was potentially affected by this event, at no cost to these individuals.

Additionally, Retirement Clearinghouse is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud. Retirement Clearinghouse is also providing the individuals with information on how to place a fraud alert and credit 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.

Retirement Clearinghouse is providing written notice of this event to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification or other aspects of the data event, please contact us at .

Very truly yours,

Josh Brian of
MULLEN COUGHLIN LLC

JPB/jrl
Enclosure

EXHIBIT A

RETIREMENT • CLEARINGHOUSE®
AN RLJ COMPANY

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

May 12, 2023

J4304-L01-0000001 T00001 P001 ********SCH 5-DIGIT 12345
SAMPLE A SAMPLE - L01 INDIVIDUAL
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789

[Extra1]

Dear Sample A. Sample:

We write to inform you of a matter that may involve some of your information, our response, and steps you may take if you feel it is appropriate to do so.

What Happened? Retirement Clearinghouse assists organizations with transferring individuals' retirement savings to reduce 401(k) cashouts and increase financial wellness. This process involves collecting information about the individuals from organizations to facilitate the transfers. We identified that between March 15 and 16, 2023, a small number of files were at risk of access without authorization. Because of this, we took measures to ensure the security of the files and notify potentially affected individuals about this matter.

What Information Was Involved? The above-referenced files contained your

What We Are Doing. We are notifying individuals about this matter and providing complimentary identity monitoring services. We took remedial measures within our organization and we are also evaluating our policies and procedures to prevent reoccurrence of this type of event.

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 and to detect errors. We also recommend you review the "Steps You Can Take To Protect Personal Information" section of this letter. Further, you may enroll in the offered complimentary identity monitoring services. Enrollment instructions are on the next page of this letter. Please note that, due to privacy restrictions, we are unable to automatically enroll you in the complimentary identity monitoring services.

For More Information. If you have questions about this matter, please contact our dedicated assistance line at , toll-free Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number ENGAGE#. You may also write to us at SIRT@rch1.com, or Retirement Clearinghouse, Attn: Sr. Risk Officer, 1916 Ayrsley Town Blvd., Ste. 200, Charlotte, NC 28273.

Sincerely,

Retirement Clearinghouse

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

To help protect your identity, we are offering a complimentary [Extra3]-month membership of Experian's IdentityWorks℠. 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**: (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll:
- Provide your **activation 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 by **August 31, 2023**. Be prepared to provide engagement number as proof of eligibility for the identity restoration services by Experian.

Additional Details Regarding Your [Extra3]-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.[1]
- **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™**: 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[2]:** 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 (833) 637-2099. 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 [Extra3] 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. You will also find self-help tips and information about identity protection at this site.

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[1] Offline members will be eligible to call for additional reports quarterly after enrolling.

[2] 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 a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any 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 a consumer's name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of 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 they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, 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
1-888-298-0045	1-888-397-3742	1-800-916-8800
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

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect their personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity

theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the 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, D.C. 20001; 202-727-3400; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and https://www.marylandattorneygeneral.gov/.

For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their 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.

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, individuals have the right to obtain any police report filed in regard to this event. There are approximately 46 Rhode Island residents that may be impacted by this event.