



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

SEP 24 2019

CONSUMER PROTECTION

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September 18, 2019

VIA U.S. MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Attorney General Gordon J. MacDonald:

We represent RoMan Manufacturing (“RoMan”), 861 47th Street SW, Wyoming, MI, 49509 and write to notify your office of an incident that may affect the security of some personal information relating to approximately one (1) New Hampshire resident. The investigation into this event is ongoing and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, RoMan 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 or about April 4, 2019, RoMan learned of suspicious activity related to an employee’s email account. RoMan immediately commenced an investigation to assess the nature and scope of the activity and changed the user’s credentials. RoMan also began working with third-party forensic expert to assist with investigating the incident. The investigation determined that one employee email account was accessed without authorization between April 3, 2019 and April 4, 2019. The investigation also determined that no other RoMan platforms or systems were affected. Through its investigation, RoMan was unable to determine which emails, if any, were specifically accessed. Out of an abundance of caution, a review of the contents of the email account was undertaken to identify what information may have been accessible and to whom that information related. It was determined that information related to certain individuals may have been accessible in the email account. Roman then worked diligently to identify contact information for those individuals whose information was present in the relevant email account. The types of information present in

the email account related to the individual residing in New Hampshire includes: name, Social Security number, and passport number.

Notice to New Hampshire Resident

On September 18, 2019, RoMan began mailing written notice of this incident to those individuals whose information was present in the email account, which includes one (1) New Hampshire resident. Written notice to the individuals 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 this incident, RoMan promptly began an investigation, with the assistance of a third-party forensic investigator, to determine the nature and scope of this incident, including identifying the individuals whose information was present in the relevant email account, putting in place resources to assist them, and providing them with notice of this incident.

RoMan is providing individuals access to twelve (12) months of Credit Monitoring, Fraud Consultation, and Identity Theft Restoration through Kroll. Additionally, RoMan is providing individuals with guidance on how to better protect against identity theft and fraud, including 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 identity theft and fraud 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. RoMan is also providing notification of the data event to applicable 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) 930-4773.

Very truly yours,



M. Alexandra Belton of
MULLEN COUGHLIN LLC

MAB:gec
Enclosure

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 Data Incident/Data Breach

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

We write to inform you of a recent incident that may affect the security of some of your personal information. While we are unaware of any actual or attempted misuse of your personal information, RoMan Manufacturing ("RoMan") takes this incident very seriously and we are providing you with information and access to resources so that you can better protect your personal information, should you feel it is appropriate to do so.

What Happened? On or about April 4, 2019, we learned of suspicious activity related to an employee's email account. RoMan immediately commenced an investigation to assess the nature and scope of the activity and changed the user's credentials. RoMan also began working with an industry leading forensic expert to assist with investigating the incident. The investigation determined that one employee email account was accessed without authorization between April 3, 2019 and April 4, 2019. The investigation also determined that no other RoMan platforms or systems were affected. Unfortunately, the investigation was not able to determine which emails, if any, were specifically accessed. Out of an abundance of caution, a review of the contents of the email accounts was undertaken to identify what information may have been accessible and to whom that information related. It was determined that certain information related to you was accessible in the email accounts.

What Information Was Involved? Our investigation determined that the information related to you that was accessible in the emails included: <<b2b_text_1 (Impacted Data)>>.

What We Are Doing. RoMan is committed to protecting the confidentiality and security of all the information we hold in our care. We have security measures, policies, and procedures in place to protect this data and we continue to review these measures as part of our ongoing commitment to the security of the information. We are reporting this incident to applicable state regulators, as well as to the individuals who may be affected by this event. We are also providing you with information about this event and about the steps you can take to better protect your personal information, should you feel it appropriate to do so.

As an added precaution, we are also offering you access to twelve (12) months of Credit Monitoring, Fraud Consultation, and Identity Theft Restoration services through Kroll, a global leader in risk mitigation and response, at no cost to you. The cost of this service will be paid for by RoMan. We encourage you to activate these services, as we are not able to act on your behalf to activate the credit monitoring service.

What You Can Do. Please review the enclosed "Privacy Safeguards." You can also activate the Credit Monitoring, Fraud Consultation, and Identity Theft Restoration services we are offering.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-833-680-7832 between 9 AM and 6:30 PM EDT Monday through Friday, excluding major U.S. holidays. Please have your membership number ready.

Sincerely,

Privacy Safeguards

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 one year. 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 enroll.idheadquarters.com to activate and take advantage of your identity monitoring services.

You have until **December 19, 2019** to activate your identity monitoring services.

Membership Number: <<Member ID>>

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, 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

PO 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

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 2002

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

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 and your state Attorney General. This notice has not been delayed by law enforcement.

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and 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 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. We encourage you to 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.

For Rhode Island Residents, The Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, and 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 XXX Rhode Island residents impacted by this incident.](#)