



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

APR 16 2021

CONSUMER PROTECTION

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

April 9, 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 Schnabel Foundation Company (“Schnabel”) located at 45240 Business Court, Suite 250, Sterling, VA 20166, 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 may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Schnabel 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 around December 15, 2020, Schnabel identified suspicious activity within its email tenant. Schnabel immediately investigated to determine the nature and scope of this activity. The investigation determined that certain email accounts were subject to unauthorized access at various times from September 2020 to December 2020. While the investigation did not identify any misuse of information, it could not conclusively rule out access to the contents of the email accounts. Schnabel therefore undertook a time-intensive, thorough review of these email accounts to identify the information present at the time of the activity and to whom it related. On March 10, 2021, Schnabel completed the review of the emails accounts and identified the information present. Schnabel then worked diligently to reconcile this information with internal records in furtherance of identifying the individuals to whom the data relates and the appropriate contact information for those individuals. Schnabel completed this review on March 24, 2021, after which Schnabel began providing notice to impacted individuals as soon thereafter as possible.

While the information in the impacted email accounts varied by individual, the information that could have been subject to unauthorized access includes name, Social Security number, and driver’s license or state identification number.

Notice to New Hampshire Residents

On April 9, 2021, Schnabel provided written notice of this incident to affected individuals, which includes two (2) New Hampshire residents. Written notice was provided in substantially the same form as the letter attached hereto as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the identified activity, Schnabel moved quickly to investigate and to respond to the incident, to assess the security of its systems, and to notify potentially affected individuals. This response included reporting this incident to law enforcement. Schnabel is also working to implement additional safeguards and to implement additional training for its employees. Further, Schnabel is providing access to credit monitoring and identity theft restoration services for twenty-four (24) months, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals. Schnabel will also be notifying other regulatory authorities, as required.

Additionally, Schnabel is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Schnabel is also 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) 930-4005.

Very truly yours,



Julie Siebert-Johnson of
MULLEN COUGHLIN LLC

JSJ/ken

EXHIBIT A

SCHNABEL

GEOSTRUCTURAL DESIGN & CONSTRUCTION

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

April 9, 2021

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



Re: Notice of Data [EXTRA1]

Dear Sample Sample:

Schnabel Foundation Company (“Schnabel”) recently discovered an incident that may affect the privacy of some of your personal information. While we have no evidence of actual or attempted misuse of your information, we wanted to provide you with information about the incident, steps we are taking in response, and steps you may take to better protect your information, should you feel it is appropriate to do so.

What Happened? In December 2020, Schnabel became aware of unusual activity relating to its email environment. We immediately began an investigation, with the aid of third-party forensic specialists, to determine the nature and scope of the activity. Through the investigation, Schnabel determined that certain email accounts were subject to unauthorized access at various times from September 2020 to December 2020. While we have no evidence of any misuse of information in the email accounts, because the forensic investigation could not conclusively rule out access to the contents of the email accounts, we undertook a time-intensive, thorough review of the email accounts to identify what information was present in the affected email accounts. On March 10, 2021, we completed the review of the emails accounts and identified the information present. We then worked diligently to reconcile this information with our internal records in furtherance of identifying the individuals to whom the data relates and the appropriate contact information for those individuals, which was completed on March 24, 2021. We thereafter worked to provide notification to potentially impacted individuals as quickly as possible. Schnabel is notifying you because we understand, based on our investigation, that your information was present in the affected email accounts during the period of unauthorized access.

What Information Was Involved? Our investigation determined that impacted information may include your [EXTRA2 - DATA ELEMENTS], and name. Again, we have no evidence of any actual or attempted misuse of your information; rather, we are letting you know in an abundance of caution and providing information and resources to assist you in protecting your personal information, should you feel it appropriate to do so.

What We Are Doing. We take this incident and the security of personal information in our care very seriously. Upon learning of unusual email activity, we moved quickly to investigate and to respond to this incident and to confirm the security of our email environment. Our response included resetting passwords across the network and reviewing the full content of the relevant email accounts to determine what information was present and to notify applicable individuals. We are also reviewing and enhancing existing policies and procedures related to data privacy. Further, we notified law enforcement of this event, and have been cooperating with their investigation.

45240 Business Court, Suite 250 Sterling, Virginia 20166 • (703) 742-0020 • www.schnabel.com
Atlanta • Chicago • Denver • Houston • Orlando • Philadelphia • San Francisco • Washington, D.C.

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Further, we have security measures in place to protect the data on our systems and we continue to assess and update security measures and training to our employees to safeguard the privacy and security of information in our care. We are also notifying regulatory authorities, as required by law.

As an added precaution we are offering you access to 24 months of credit monitoring and identity theft protection services through Experian at no cost to you. If you wish to activate these services, you may follow the instructions included in the attached *Steps You Can Take to Help Protect Your Information*. We encourage you to enroll in these services as we are unable to act on your behalf to do so.

What You Can Do. We encourage you to remain vigilant against theft and fraud, to monitor your accounts for any unusual activity, and to report any instances of theft or fraud to law enforcement. You can also enroll to receive the complimentary credit monitoring services that we are offering to you. Please also review the enclosed *"Steps You Can Take to Help Protect Your Information."*

For More Information. We understand that you may have questions that are not addressed in this notice. If you have additional questions or concerns, please call our dedicated call center at (855) 223-4828, which is available from 6 am through 8 pm PST, which is available Monday through Friday and 8 am through 5pm PST Saturday/Sunday (excluding major U.S. holidays). You can also write to Schnabel at 45240 Business Court, Suite 250, Sterling, VA 20166.

We sincerely regret any inconvenience or concern this incident causes you.

Sincerely,

A handwritten signature in black ink, appearing to be 'D. Harris', with a horizontal line extending to the right.

David Harris
Chief Financial Officer
Schnabel Foundation Company

Steps You Can Take to Help Protect Your Information

Enroll in the Complimentary Credit Monitoring and Identity Protection Services

We are offering a complimentary two-year membership of Experian's® IdentityWorksSM. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: June 30, 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: 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 (855) 223-4828 by **June 30, 2021**. Be prepared to provide engagement number **B011330** as proof of eligibility for the identity restoration services by Experian.

A credit card is **not** required for enrollment in Experian IdentityWorks. You can contact Experian **immediately** regarding any fraud issues.

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 (855) 223-4828. 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.

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 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;

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6. A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, 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 fraud alert or credit freeze, 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
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; 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 District of Columbia residents, the District of Columbia Attorney General may be contacted at: 441 4th St. NW #1100 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 www.oag.state.md.us. Schnabel is located at 45240 Business Court, Suite 250, Sterling, VA 20166.

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 bureaus 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 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, you have the right to obtain any police report filed in regard to this incident. There are approximately 0 Rhode Island residents impacted by this incident.