



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

JUN 11 2021

CONSUMER PROTECTION

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

June 7, 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 Seven Bridges Advisors, LLC ("SBA") located at 9 West 57th Street, 29th Floor, New York, NY 10019, and are writing to notify your office of an incident that may affect the security of some personal information relating to three (3) 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, SBA 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 On December 14, 2020, SBA became aware of suspicious activity involving an employee email account. SBA promptly launched an investigation and determined that an unknown bad actor gained unauthorized access to a single employee email account during the four-day period beginning December 11, 2020. While the investigation revealed no evidence that any information available through the account (including emails, attachments or contact information) was viewed or taken, SBA was not able to rule that potential out conclusively. As a result, in an abundance of caution, SBA undertook a detailed and diligent review of all potentially accessible data in the subject account. On May 18, 2021, this comprehensive review was completed, and SBA confirmed the full scope of sensitive data present within the account.

The information that could have been subject to unauthorized access includes name, address, Social Security number, driver's license, passport number, and financial account information.

Notice to New Hampshire Residents

On or about June 7, 2021, SBA provided written notice of this incident to all affected individuals, which includes three (3) 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, SBA moved quickly to investigate and respond to the incident, assess the security of SBA systems, and notify potentially affected individuals. SBA is also working to implement additional safeguards and training to its employees. SBA is providing access to credit monitoring services for twelve (12) months, through Epiq, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, SBA 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. SBA 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) 930-4861.

Very truly yours,



Kevin Dolan of
MULLEN COUGHLIN LLC

KED/mep

EXHIBIT A



SEVEN BRIDGES

Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

NOTICE OF <<Variable Header>>

Dear <<Name 1>>:

We are writing to inform you of a security incident that potentially could have affected your personal information. While we do not have any evidence that your information has or will be misused, we are writing out of an abundance of caution to provide you with information about the incident. We also want to share some steps you can take to protect yourself against the possibility of identity theft and fraud, should you feel it appropriate to do so. It is very unfortunate that this event occurred, and we want to make sure that everyone has available to them all resources necessary to make sure their information is protected.

What Happened? On December 14, 2020, we became aware of suspicious activity involving an employee email account. We promptly launched an investigation and determined that an unknown bad actor gained unauthorized access to a single employee email account during the four day period beginning December 11, 2020. While our investigation revealed no evidence that any information available through the account (including emails, attachments or contact information) was viewed or taken, we are not able to conclude with absolute certainty that it was not. On May 18, 2021, this comprehensive review was completed and we confirmed the full scope of sensitive data present within the account.

What Information Was Involved? Our investigation determined that your <<Breached Elements>> was accessible within the email account.

What We Are Doing. We take the privacy of your information seriously and deeply regret that this incident occurred. Upon discovery, we promptly launched an investigation to determine what happened, and engaged an independent forensic investigation firm to assist us in our investigation of the incident. As described below, we are offering you, and other individuals whose information was potentially accessible, complimentary identity protection and credit monitoring services.

What You Can Do. Although we are not aware of any misuse of information arising out of this incident, we want to make you aware of steps you can take as a precaution:

- *Activate Complimentary Identity Protection Services.* We are offering you access to <<CM Length>> months of credit monitoring and identity protection services through Equifax at no cost to you. These services help detect possible misuse of your personal information and provide you with identity protection support to help identify and resolve potential identity theft. We encourage you to enroll in these services, as we are not able to act on your behalf to enroll you. Please review the instructions contained in the attached *Steps You Can Take to Protect Personal Information* for additional information on these services.
- *Check Credit Reports and Financial Accounts.* We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your financial account statements and monitoring your credit reports for suspicious activity. You can obtain a free copy of your credit report by visiting www.annualcreditreport.com. See also the enclosed *Steps You Can Take to Protect Personal Information*, which describes additional steps you may wish to take to help protect yourself.

For More Information. We understand you may have questions that are not answered in this letter. To ensure your questions are answered in a timely manner, you can call our dedicated assistance line at 855-535-1823, Monday through Friday, 9 a.m. to 9 p.m. Eastern Time (excluding U.S. holidays) or email us at clientservices@sevenbridgesadvisors.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Cohen". The signature is fluid and cursive, with a large initial "L" and "C".

Larry Cohen
Seven Bridges Advisors, LLC

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring



Enter your Activation Code: <<ACTIVATION CODE>>
Enrollment Deadline: <<Enrollment Deadline>>

Equifax Credit Watch™ Gold

*Note: You must be over age 18 with a credit file to take advantage of the product

Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts², which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock³
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁴

Enrollment Instructions

Go to www.equifax.com/activate.

Enter your unique Activation Code of <<ACTIVATION CODE>> then click "Submit" and follow these 4 steps:

1. **Register:**
Complete the form with your contact information and click "Continue".
If you already have a myEquifax account, click the 'Sign in here' link under the "Let's get started" header. Once you have successfully signed in, you will skip to the Checkout Page in Step 4.
2. **Create Account:**
Enter your email address, create a password, and accept the terms of use.
3. **Verify Identity:**
To enroll in your product, we will ask you to complete our identity verification process.
4. **Checkout:**
Upon successful verification of your identity, you will see the Checkout Page.
Click 'Sign Me Up' to finish enrolling.
You're done!
The confirmation page shows your completed enrollment.
Click "View My Product" to access the product features.

To sign up for US Mail delivery, dial 1-855-833-9162 for access to the Equifax Credit Watch automated enrollment process. Note that all credit reports and alerts will be sent to you via US Mail only.

1. **Activation Code:** You will be asked to enter your enrollment code as provided at the top of this letter.
2. **Customer Information:** You will be asked to enter your home telephone number, home address, name, date of birth and Social Security Number.
3. **Permissible Purpose:** You will be asked to provide Equifax with your permission to access your Equifax credit file and to monitor your file. Without your agreement, Equifax cannot process your enrollment.
4. **Order Confirmation:** Equifax will provide a confirmation number with an explanation that you will receive your Fulfillment Kit via the US Mail (when Equifax is able to verify your identity) or a Customer Care letter with further instructions (if your identity can not be verified using the information provided). Please allow up to 10 business days to receive this information.

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;
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. SBA is located at 9 West 57th Street, 29th Floor, New York, NY 10019.

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 three (3) Rhode Island residents impacted by this incident.

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/>.