



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED
FEB 14 2022

CONSUMER PROTECTION

Gregory J. Bautista
Office: (267) 930-1509
Fax: (267) 930-4771
Email: gbautista@mullen.law

1127 High Ridge Road, #301
Stamford, CT, 06905

February 8, 2022

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 Shawmut Communications Group (“Shawmut”), located at 310 Jubilee Drive, Peabody, MA 01960, and are writing to notify your Office of an incident that may affect the security of some personal information relating to eighteen (18) 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, Shawmut 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 October 26, 2021, Shawmut discovered it could not access certain files on its servers. Upon discovery of the event, Shawmut immediately launched an investigation with the assistance of third-party computer forensics specialists. The investigation determined that certain systems had been infected by malware which prevented access to some files on the network. The investigation also determined that certain files within Shawmut’s network were subject to unauthorized access. Shawmut then took steps to conduct a thorough and time-intensive review of the impacted data to ensure we identified all individuals with information potentially at risk, as well as to identify contact information for those individuals. That process was completed on January 3, 2022. Although Shawmut is unaware of any actual or attempted misuse of individuals’ information, Shawmut is providing notice of this incident to those individuals whose information was impacted.

Mullen.law

The information related to New Hampshire residents that could have been subject to unauthorized access were name, mailing address, date of birth, and Social Security number.

Notice to New Hampshire Residents

On or about February 8, 2022, Shawmut began providing written notice of this incident to affected individuals, which includes approximately eighteen (18) 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

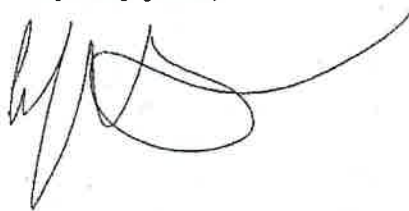
Upon discovering the event, Shawmut moved quickly to investigate and respond to the incident, assess the security of Shawmut, and notify potentially affected individuals. Shawmut implemented additional security measures along with reviewing and enhancing existing policies and procedures to reduce the likelihood of a similar future event. Shawmut is providing access to credit monitoring services for two years, through IDX, to individuals whose information was potentially affected by this incident, at no cost to these individuals.

Additionally, Shawmut is providing impacted 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, 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 event, or wish to discuss this matter further, please contact us at 267-930-1509.

Very truly yours,

A handwritten signature in black ink, appearing to read 'G. Bautista', with a long horizontal flourish extending to the right.

Gregory J. Bautista of
MULLEN COUGHLIN LLC

GJB/mwj
Enclosure

EXHIBIT A



310 Jubilee Drive
Peabody, Ma 01960

To Enroll, Please Visit:
<https://app.idx.us/account-creation/protect>
Enrollment Code: xxxx

[First Name] [Last Name]
[Address 1]
[Address 2]
[City] [State] [Zip Code]

2/07/2022

Re: Notice of Security Incident

Dear [Name]:

Shawmut Communications Group (“Shawmut”) is writing to inform you of an event that may impact the privacy of some of your personal information. While we are unaware of any attempted or actual misuse of your information, we are providing you with information about the event, our response, and steps you may take to protect against any misuse of your information, should you feel it necessary to do so.

What Happened? On or about October 26, 2021, Shawmut discovered it could not access certain files on its servers. Upon discovery of the event, Shawmut immediately launched an investigation with the assistance of third-party computer forensics specialists. The investigation determined that certain systems had been infected by malware which prevented access to some files on the network. The investigation also determined that certain files within Shawmut’s network were subject to unauthorized access. Shawmut then took steps to conduct a thorough and time-intensive review of the impacted data to ensure we identified all individuals with information potentially at risk, as well as to identify contact information for those individuals. That process was completed on January 3rd 2022 . Although Shawmut is unaware of any actual or attempted misuse of individuals’ information, Shawmut is providing notice of this incident to those individuals whose information was impacted.

What Information Was Involved? The impacted information related to you includes name, address, date of birth, and Social Security number. We have no evidence your information was subject to actual or attempted misuse.

What We Are Doing. We take this incident and the security of personal information in our care very seriously. As part of our ongoing commitment to the privacy of information in our care, we are implementing additional technical security measures designed to mitigate recurrence of this type of incident. We are also reviewing and enhancing existing data privacy policies and procedures.

As an added precaution we are offering you access to **twenty-four months of credit monitoring** and identity theft protection services through IDX 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 Personal 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 incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors over the next 12 to 24 months. We also encourage you to review the *Steps You Can Take to Help Protect Your Personal Information* section of this letter.

For More Information. If you have questions about this incident that are not addressed in this letter, please contact us at 978-762-7500 or email us at creditmonitoring@shawmutdelivers.com.

Sincerely,

Michael Peluso
President
Shawmut Communications Group

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Identity Monitoring Services

1. Website and Enrollment. Go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter or call 1-800-939-4170. Please note the deadline to enroll is May 19, 2022.

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

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, 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 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: 400 6th Street, NW, Washington, DC 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. C Squared Systems is located at 65 Dartmouth Drive, Auburn, NH 03032.

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 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/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 [#] Rhode Island residents impacted by this incident.

