MULLEN COUGHLIN LLC
ATTORNEYS AT LAW

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426 W. Lancaster Avenue, Suite 200
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October 22, 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 Smith Protective Management ("Smith") located at 4440 Beltway Drive, Addison, TX 75001, and are writing to notify your office of an incident that may affect the security of some personal information relating to six (6) New Hampshire residents. The investigation into this matter is complete. There are no new significant facts expected to be learned subsequent to this notice submission. By providing this notice, Smith 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 August 2, 2021, Smith became aware of suspicious activity in its computer network. Smith immediately took steps to secure its network and minimize any disruption to its operations. Smith launched an investigation into the nature and scope of the incident with the assistance of industry-leading cybersecurity specialists. The investigation determined that an unknown actor accessed Smith's systems between July 30, 2021 and August 1, 2021. On August 16, 2021, Smith determined that files containing sensitive information relating to current and former employees may have been impacted by the incident. Since that time, Smith conducted a thorough and time-consuming internal review to identify names and last known addresses of individuals potentially impacted by the incident, and that review was recently completed.

The information that may have been impacted includes name, address, Social Security number, and financial account information.

Notice to New Hampshire Residents

On October 20, 2021, Smith provided written notice of this incident to all affected individuals, which includes six (6) 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, Smith moved quickly to investigate and respond to the incident, assess the security of Smith's systems, and notify potentially affected individuals. Smith also implemented additional safeguards to further secure the information in its systems and help protect against similar incidents moving forward. Smith is providing access to credit monitoring services for one (1) year, through Kroll Inc., to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Smith 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. Smith 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) 930-4801.

Very truly yours,

Alexander T. Walker of
MULLEN COUGHLIN LLC

ATW/rzh
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>>

<<b2b_text_1(Variable Text)>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

<<b2b_text_2(Variable Text)>> ("Smith") is writing to make you aware of an incident that may affect the security of some of your information. Safeguarding information is among Smith's highest priorities, and this letter provides details of the incident, our response to it, and resources available to you right now to help protect your personal information from possible misuse, should you feel it is appropriate to do so.

What Happened?

On August 2, 2021, Smith became aware of suspicious activity in our computer network. We immediately took steps to secure our network and minimize any disruption to our operations. We launched an investigation into the nature and scope of the incident with the assistance of industry-leading cybersecurity specialists. At the conclusion of the investigation, we learned that files containing certain employee information may have been impacted by this incident.

What Information Was Involved?

The investigation determined the following types of employee personal information may have been impacted by this incident: name, Social Security number, and financial account information. We have no evidence that this information has been subject to actual or attempted misuse.

What We Are Doing.

Information security is among Smith's highest priorities, and we have strict security measures in place to protect information in our care. Upon becoming aware of this incident, we immediately took steps to confirm the security of our systems, including the deployment of an advanced threat protection and monitoring tool. We have taken all steps possible to negate the risk that your information is publicly posted. Additionally, we have implemented cybersecurity measures to further protect against similar incidents moving forward. We reported this incident to law enforcement and are cooperating with their investigation. We are notifying impacted individuals, including you, so that you may take steps to best protect your information, should you feel it is appropriate to do so. We are also reporting to regulatory authorities, as required.

As an added precaution, we are offering you immediate access to identity monitoring services for **12 months** at no cost to you, through Kroll. Kroll's identity monitoring services include: Credit Monitoring, Fraud Consultation, and Identity Theft Restoration. 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. You can find information on how to enroll in these services in the below "*Steps You Can Take to Help Protect Your Information.*" We encourage you to activate these services yourself, as we are not able to do so on your behalf.

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. Additional information and resources are included in the enclosed *"Steps You Can Take to Help Protect Personal Information."*

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 contact 1-???-???-???, Monday through Friday, between the hours of 8:00 a.m. and 5:30 p.m. Central Time (except U.S. holidays). We take this incident very seriously and sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

Aaron Smith

Aaron Smith
President

Steps You Can Take to Help Protect Personal Information

Activate Identity Monitoring

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.

Visit **https://enroll.krollmonitoring.com** to activate and take advantage of your identity monitoring services.

*You have until **January 19, 2022** to activate your identity monitoring services.*

Membership Number: <<Membership Number s_n>>

KROLL

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

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.

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.