



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

MAR 07 2022

CONSUMER PROTECTION

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

March 3, 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 Sourcemia LLC DBA Arizent (“Arizent”) located at One State St. Plaza, 27th Floor, New York, NY 10004, 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. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Arizent 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 May 21, 2021, Arizent became aware of suspicious activity in their computer network. Arizent immediately took steps to minimize any disruption to their operations, secure their network, and launched an investigation into the nature and scope of these incidents with the assistance of industry-leading cybersecurity specialists. The investigation determined there was unauthorized access gained to their network by unknown actors on May 21, 2021 and between July 21-27, 2021. During these brief periods of unauthorized activity, certain files may have been viewed or removed by the unauthorized actors.

Based on the above, Arizent undertook a lengthy and labor-intensive process to identify individuals whose sensitive information was contained in the potentially impacted files. This process completed on December 8, 2021. Following the identification of potentially impacted individuals, Arizent then needed to identify address information for potentially impacted

individuals in order to provide notification. Arizent is notifying individuals out of an abundance of caution because the investigation determined that certain information may have been impacted. The information that may have been subject to unauthorized access varies by individual and includes name, address, and Social Security number.

Notice to New Hampshire Residents

On or about March 3, 2022, Arizent began providing 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 becoming aware of the event, Arizent moved quickly to investigate and respond to the incident, assess the security of Arizent systems, and notify potentially affected individuals. Arizent is also working to implement additional safeguards and training to its employees. Arizent is providing access to credit monitoring services for one (1) year, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Arizent 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. Arizent 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. Arizent is also notifying the three major consumer/credit reporting bureaus and other state regulators.

Office of the New Hampshire Attorney General

March 3, 2022

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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/ams
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 999
Suwanee, GA 30024

1 1 27 *****AUTO**MIXED AADC 300
SAMPLE A. SAMPLE - General Adult Letter



APT ABC
123 ANY ST
ANYTOWN, US 12345-6789



[Extra1]

March 2, 2022

Dear Sample A. Sample:

Sourcemia, LLC DBA Arizent (“Arizent”) is writing to make you aware of an incident that may affect the security of some of your personal information. Safeguarding information is among Arizent’s highest priorities, and this letter provides details of the incident, our ongoing 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 May 21, 2021, Arizent became aware of suspicious activity in our computer network. We immediately took steps to minimize any disruption to our operations, secure our network, and launched an investigation into the nature and scope of these incidents with the assistance of industry-leading cybersecurity specialists. The investigation determined there was unauthorized access gained to our network by unknown actors on May 21, 2021 and between July 21-27, 2021. During these brief periods of unauthorized activity, certain files may have been viewed or removed by the unauthorized actors.

Based on the above, we undertook a lengthy and labor-intensive process to identify individuals whose sensitive information was contained in the potentially impacted files. This process completed on December 8, 2021. Following the identification of potentially impacted individuals, we then needed to identify address information for potentially impacted individuals in order to provide notification. We are notifying individuals out of an abundance of caution because the investigation determined that certain information relating to you may have been impacted.

What Information Was Involved? Our investigation determined the following types of information may have been impacted: [Extra2] and name. Arizent does not have any indication at this time that your information was subject to actual or attempted misuse.

What We Are Doing. Information security is among Arizent’s highest priorities, and we have strict security measures in place to protect information in our care. In response to these incidents, we took steps to confirm and strengthen the security of our systems. We are continuously reviewing existing security policies and implemented additional 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 credit monitoring and identity theft protection services for [Extra3] months at no cost to you, through Experian IdentityWorks. 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 enroll in these services 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. Please also review the information contained in the enclosed “*Steps You Can Take to Help Protect Your 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 call our dedicated assistance line at (855) 726-7360, toll-free Monday through Friday from 8 am - 10 pm Central, or Saturday and Sunday from 10 am - 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number: [Engagement Number]. We take this incident very seriously and sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

A handwritten signature in cursive script that reads "Gemma Postlethwaite". The signature is written in black ink and is positioned above the printed name.

Gemma Postlethwaite
Chief Executive Officer
Arizent

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for [Extra3].

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. 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 from the date of the incident (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 Identity Restoration is available to you for [Extra3] 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.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary [Extra3] membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by April 30, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: www.experianidworks.com/credit
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **(855) 726-7360** by **April 30, 2022**. Be prepared to provide engagement number [Engagement Number] as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR [EXTRA3] EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

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
1-888-298-0045	1-888-397-3742	1-833-395-6938
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. Arizent is located at One State St. Plaza, 27th Floor, New York, NY 10004.

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. Arizent is located at One State Street Plaza, 27th Floor, New York, NY 10004.

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 is/are approximately 8 Rhode Island residents impacted by this incident.