



MULLEN  
COUGHLIN<sup>LLC</sup>  
ATTORNEYS AT LAW

RECEIVED  
MAY 24 2021  
CONSUMER PROTECTION

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

May 18, 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 Stephen Gould Corporation (“SGC”) located at 35 South Jefferson Road, Whippany, NJ 07981, and are writing to notify your Office of an incident that may affect the privacy of information relating to certain New Hampshire residents. This notice may be supplemented with any new significant facts learned subsequent to this submission. By providing this notice, SGC does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

**Nature of the Data Event**

On September 19, 2020, SGC became aware of a malware incident impacting its systems. SGC immediately began working to restore its systems and launched an investigation to determine the nature and scope of the incident. The investigation determined that certain SGC data was viewed or taken by an unauthorized actor. Therefore, SGC conducted a thorough and time-intensive review of the potentially impacted data to identify individuals with information at risk. On April 12, 2021, SGC finalized this review to confirm the nature and scope of all impacted data and the individuals to whom that data related. Although SGC is unaware of any actual or attempted misuse of personal information, SGC is providing notice to potentially impacted individuals in an abundance of caution.

The types of information potentially impacted vary by individual but included name and the following for your state’s resident: date of birth, driver’s license number, Social Security Number, and health insurance information.

### **Notice to New Hampshire Residents**

On May 18, 2021, SGC began providing written notice of this incident to affected individuals, which includes forty-one (41) 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**

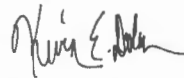
Upon learning of this incident, SGC moved quickly to investigate and respond to this incident, assess the security of its systems, restore functionality to its environment, and notify potentially affected individuals. As part of its ongoing commitment to the security of information, SGC notified federal law enforcement and has significantly improved and augmented its policies and procedures addressing its network security.

As an added precaution, SGC is offering the impacted New Hampshire residents' access to twelve (12) months of free credit monitoring and identity protection services through Kroll. SGC is also providing the impacted New Hampshire residents with guidance on how to better protect against identity theft and fraud. Such guidance includes information on how to place a fraud alert and security freeze on one's credit file, contact details for the national consumer reporting agencies, information on how to obtain a free credit report, reminders to remain vigilant for incidents of identity theft and fraud by reviewing account statements and monitoring free credit reports, and recommendations regarding how 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.

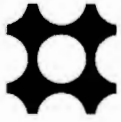
Very truly yours,



Kevin E. Dolan of  
Mullen Coughlin, LLC

KED/meg  
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 >>

## Re: Notice of Data Breach

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>:

Stephen Gould Corporation (“SGC”) is writing to notify you of an incident that may have impacted the security of some of your information. We want to provide you with information about the incident, our response, and steps you may take to better protect against possible misuse of your information, should you feel it necessary to do so.

**What Happened?** On September 19, 2020, SGC became aware of a malware incident impacting its systems. We immediately began working to restore our systems and launched an investigation to determine the nature and scope of the incident. Our investigation determined that certain SGC data was viewed or taken by an unauthorized actor. Therefore, we conducted a thorough and time-intensive review of the potentially impacted data to identify individuals with information at risk. On April 12, 2021, SGC finalized this review to confirm the nature and scope of all impacted data and the individuals to whom that data related. Although we are unaware of any actual or attempted misuse of your personal information, we are providing you this notice out of an abundance of caution.

**What Information was Involved?** The investigation determined that your <<b2b\_text\_1(DataElements)>> may have been viewed or taken by an unauthorized individual.

**What We Are Doing.** We take this incident and the security of personal information in our care very seriously. Upon learning of this incident, we moved quickly to investigate and respond to this incident, assess the security of our systems, restore functionality to our environment, and notify potentially affected individuals. As part of our ongoing commitment to the security of information, we notified federal law enforcement and have significantly improved and augmented our policies and procedures addressing our network security.

As a precautionary measure, we are notifying potentially affected individuals, including you, so that you may take further steps to best protect your information, should you feel it is appropriate to do so.

We regret any inconvenience or concern this incident may cause. As an added precaution, SGC is offering you access to 12 months of free identity monitoring services through Kroll at no cost to you.

**What You Can Do.** Please review the enclosed *Steps You Can Take to Help Protect Your Information*, which contains information on what you can do to better protect against possible misuse of your information. We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. You will also find information on how to activate the identity monitoring services offered.

**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 the dedicated assistance line at 1-???-???-????, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time excluding major U.S. holidays. Please have your membership number ready. Again, we take the privacy and security of personal information in our care seriously, and sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

STEPHEN GOULD CORPORATION

### ***Steps You Can Take to Help Protect Your Information***

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. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <<IDMonitoringURL>> to activate and take advantage of your identity monitoring services.

You have until <<Date>> to activate your identity monitoring services.

Membership Number: <<Member ID>>



### **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 will 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.

## **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](http://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:

| <b>Equifax</b>  | <b>Experian</b>   | <b>TransUnion</b>   |
|---|---|---|
| <a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a> | <a href="https://www.experian.com/help/">https://www.experian.com/help/</a> | <a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a> |
| 1-888-298-0045  | 1-888-397-3742  | 1-833-395-6938  |
| Equifax Fraud Alert, P.O. Box 105069<br>Atlanta, GA 30348-5069  | Experian Fraud Alert, P.O. Box 9554,<br>Allen, TX 75013                     | TransUnion Fraud Alert, P.O. Box<br>2000, Chester, PA 19016                                 |
| Equifax Credit Freeze, P.O. Box<br>105788 Atlanta, GA 30348-5788  | Experian Credit Freeze, P.O. Box<br>9554, Allen, TX 75013                   | TransUnion Credit Freeze, P.O. Box<br>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](http://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, D.C. 20001; 202-727-3400; and [oag@dc.gov](mailto: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](http://www.oag.state.md.us). SGC is located at 35 South Jefferson Road, Whippany, NJ 07981.

*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](http://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](http://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.](#)

*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](http://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/>.