



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW



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426 W. Lancaster Avenue, Suite 200
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April 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 Stroudwater Associates, Inc. (“Stroudwater Associates”), located at 1685 Congress Street, Portland, ME 04102, and are writing to notify your office of an incident that may affect the security of some personal information relating to two (2) 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, Stroudwater Associates 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

In October of 2020, Stroudwater Associates became aware of suspicious activity related to an employee email account. Stroudwater Associates immediately launched an internal investigation which included working with a third-party forensic investigation firm to determine what may have happened. The investigation was not able to determine which emails, if any, were viewed. Since Stroudwater Associates was unable to determine what emails were viewed, Stroudwater Associates completed a programmatic and manual review to determine whether sensitive information was present in the emails at the time of the event. On January 19, 2021, the review was completed and Stroudwater determined that personal information was present in the email account at the time of the event.

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The information that could have been subject to unauthorized access includes name, address, and Social Security number.

Notice to New Hampshire Residents

On or about April 7, 2021, Stroudwater Associates provided written notice of this incident to all affected individuals, which includes two (2) 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, Stroudwater Associates moved quickly to investigate and respond to the incident, assess the security of Stroudwater Associates systems, and notify potentially affected individuals. Stroudwater Associates is also working to implement additional safeguards and training to its employees. Stroudwater Associates is providing access to credit monitoring services for one (1) year, through TransUnion, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Stroudwater Associates 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. Stroudwater Associates is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, 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) 930-4554.

Very truly yours,

A handwritten signature in blue ink that reads "Matthew V. Toldero". The signature is written in a cursive style with a long, sweeping underline.

Matthew V. Toldero of
MULLEN COUGHLIN LLC

MVT/jcj

EXHIBIT A



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

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

<<Date>>

Dear <<Name1>>:

Stroudwater Associates (“Stroudwater”) is writing to inform you of a recently discovered data security event that has potentially impacted the security of your information. We are unable to confirm whether your information was subject to unauthorized access, but because the possibility exists, we are providing this notice. We are writing out of an abundance of caution to provide you with steps you can take to better protect yourself against the possibility of identity theft and fraud, should you feel it appropriate to do so.

What Happened? In October of 2020, we became aware of suspicious activity related to an employee email account. We immediately launched an internal investigation which included working with a third-party forensic investigation firm to determine what may have happened. Unfortunately, the investigation was not able to determine which emails, if any, were viewed.

Since we are unable to determine what emails were viewed, we completed a programmatic and manual review to determine whether sensitive information was present in the emails at the time of the event. On January 19, 2021, we determined that your information was present in the relevant email accounts. We are providing you this notification out of an abundance of caution because your personal information was present in an email account at the time of the event.

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

What We Are Doing. The privacy and security of information in our possession is one of our highest priorities. Upon learning of this event, we immediately launched an internal investigation to determine the scope of the event. Although we are unable to confirm if your information was impacted, as an added precaution, we are offering you access to twelve (12) months of credit monitoring and identity theft restoration services through TransUnion at no cost to you. 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.

What You Can Do. You can review the enclosed *Steps You Can Take to Protect Personal Information*, which contains information on what you can do to better protect against the possibility of identity theft and fraud should you feel it is appropriate to do so. You may also enroll to receive the free credit monitoring and identity theft protection services we are offering.

For More Information. We sincerely regret any inconvenience or concern this may have caused you. 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 855-654-0892, 9 a.m. to 9 p.m. Eastern Time Monday through Friday (excluding US holidays). You may also write to Stroudwater at: Stroudwater Crossing, 1685 Congress St., Suite 202, Portland, Maine 04102.

Sincerely,

A handwritten signature in black ink, appearing to read 'J S' followed by a stylized flourish.

Jeffrey Sommer
Managing Director
Stroudwater Associates

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring Services

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*myTrueIdentity*) for one year provided by TransUnion Interactive, a subsidiary of TransUnion,[®] one of the three nationwide credit reporting companies.

How to Enroll: You can sign up online or via U.S. mail delivery

- To enroll in this service, go to the *myTrueIdentity* website at www.MyTrueIdentity.com and, in the space referenced as “Enter Activation Code,” enter the 12-letter Activation Code <<Activation Code>> and follow the three steps to receive your credit monitoring service online within minutes.
- If you do not have access to the Internet and wish to enroll in a similar offline, paper-based credit monitoring service, via U.S. mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the six-digit telephone passcode <<Pass Code>> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and <<Enrollment Deadline>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH COMPLIMENTARY CREDIT MONITORING SERVICE:

- Once you are enrolled, you will be able to obtain one year of unlimited access to your TransUnion credit report and credit score.
- The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, changes of address, and more.
- The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

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 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 regarding this event. There is one (1) Rhode Island resident impacted by this incident.