



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

SEP 21 2021

CONSUMER PROTECTION

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

September 17, 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 Sugar Steel Corporation (“Sugar Steel”) located at 2521 State Street, Chicago Heights, IL 60411, and are writing to notify your office of an incident that may affect the security of some personal information relating to twenty-six (26) New Hampshire residents. Sugar Steel reserves the right to supplement this notice with any new significant facts learned subsequent to its submission. By providing this notice, Sugar Steel 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 December 22, 2020, Sugar Steel became aware of unusual activity related to a company email account. In response, Sugar Steel immediately launched an investigation to determine the nature and scope of the activity. The investigation determined that two employee email accounts were accessed by an unknown actor between December 8, 2020 and December 22, 2020. Although the investigation was unable to determine whether personal information stored in impacted email accounts had actually been viewed or removed by the unknown actor, Sugar Steel could not rule out the possibility of such activity. Therefore, in an abundance of caution, Sugar Steel worked with specialists to undertake a thorough review of the information stored within the impacted email accounts to identify the presence of any personal information. This process was completed on March 25, 2021. After determining that personal information was present in the accounts, Sugar Steel worked to confirm the address information for those individuals and entities. This review was recently concluded on August 5, 2021. The information that could have been subject to unauthorized access includes name, address, and Social Security number.

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Notice to New Hampshire Residents

On or about September 17, 2021, Sugar Steel provided written notice of this incident to all affected individuals, which includes twenty-six (26) 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, Sugar Steel moved quickly to investigate and respond to the incident, assess the security of Sugar Steel systems, and notify potentially affected individuals. Sugar Steel is also working to implement additional safeguards and training to its employees. Sugar Steel is providing access to credit monitoring services for twelve (12) months, through IDX, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Sugar Steel 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. Sugar Steel 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) 930-4776.

Very truly yours,



Edward J. Finn of
MULLEN COUGHLIN LLC

EXHIBIT A

To Enroll, Please Call:
1-833-909-3941
Or Visit:
[https://app.idx.us/account-
creation/protect](https://app.idx.us/account-creation/protect)
Enrollment Code: <<Enrollment>>

<<FirstName>> <<LastName>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

September 17, 2021

Re: NOTICE OF SECURITY INCIDENT

Dear <<FirstName>> <<LastName>>:

Sugar Steel Corporation (“Sugar Steel”) is writing to inform you of a recent event that may impact the security of some of your information. We take this issue seriously and are providing you with information about the event and steps you may take to help protect your personal information, should you feel it is appropriate to do so.

What Happened? On or about December 22, 2020, Sugar Steel became aware of unusual activity related to a company email account. In response, Sugar Steel immediately launched an investigation to determine the nature and scope of the activity. The investigation determined that two employee email accounts were accessed by an unknown actor between December 8, 2020 and December 22, 2020. Although the investigation was unable to determine whether personal information stored in impacted email accounts had actually been viewed or removed by the unknown actor, we could not rule out the possibility of such activity. Therefore, in an abundance of caution, we worked with specialists to undertake a thorough review of the information stored within the impacted email accounts to identify the presence of any personal information. This process was completed on March 25, 2021. After determining that personal information was present in the accounts, Sugar Steel worked to confirm the address information for those individuals and entities. This review was recently concluded on August 5, 2021.

What Information Was Involved? The following types of information were contained within the impacted email accounts: your name and <<Variable Data 1>>. To date, we are unaware of any actual misuse of this information as a result of this incident and are providing this notice out of an abundance of caution.

What We Are Doing. The security of information in our care is among our highest priorities. In addition to launching an internal investigation into this incident, we took additional actions, such as implementing multi-factor authentication for all Sugar Steel employee email accounts.

Although we are unaware of any actual misuse of your information as a result of this incident, we are offering you access to complimentary credit monitoring, fraud consultation, and identity theft restoration services through IDX for <<Membership Offering Length>>. We also reported this event to certain state regulators.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and monitor your credit reports for suspicious activity. You may also review the information contained in the attached “Steps You Can Take to Help Protect Personal Information.” There you will also find more information on the credit monitoring and identity protection services we are making available to you. While Sugar Steel will cover the cost of these services, you will need to complete the activation process. Enrollment instructions are attached to this letter.

For More Information. If you have additional questions, please call our dedicated assistance line at 1-833-909-3941, Monday through Friday, 6:00am to 6:00pm Pacific Standard Time (except U.S. holidays). You may also write to Sugar Steel at 2521 State Street, Chicago Heights, IL 60411.

We apologize for any inconvenience or concern this event may cause.

Sincerely,

Steve Dimovski

Steve Dimovski
Vice President
Sugar Steel Corporation
www.sugarsteel.com

Steps You Can Take to Protect Personal Information

Enroll in Credit Monitoring

We are providing you with complementary identity theft protection services through IDX. IDX identity protection services include: <<Membership Offering Length>> of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised. Please note the deadline to enroll is December 17, 2021.

Please follow the instructions below to enroll:

- 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.
- 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.
- 3. Telephone.** Contact IDX at 1-833-909-3941 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

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 District of Columbia residents, the District of Columbia Attorney General may be contacted at: 441 4th St. NW #1100 Washington, D.C. 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. Sugar Steel is located at 2521 State Street Chicago Heights, IL 60411.

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 2 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, 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/>.