



February 23, 2022

VIA ELECTRONIC MAIL

Attorney General John Formella
Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301
Phone: (603) 271-3643
Fax: (603) 271-2110

Re: Notification of Data Security Incident

To Whom It May Concern:

We represent Summit c/o Array Marketing Inc. ("Summit") in connection with a recent data security incident which is described in greater detail below. Summit takes the privacy and security of the information within its control very seriously and is taking steps to help prevent a similar incident from occurring in the future.

1. Nature of the Data Security Incident

On October 13, 2021 an unauthorized person accessed our computer system in order to interfere with our operations. Although we were subject to a cyber incident, action by our Information Technology team, and with the assistance of independent cyber security experts, quickly contained the incident. Working with cyber-security experts, we conducted a comprehensive investigation intended to gain a fulsome picture of the events and to determine if any personal or otherwise sensitive information may have been affected. While we have no evidence that anyone's information has been misused, the investigation eventually indicated that some personal information may have been involved in the incident. We confirmed the location and state residency of the potentially affected people on February 10, 2022.

2. Number of New Hampshire Residents Affected

The incident may have affected one New Hampshire resident. Notification letters were prepared and are post marked for February 23, 2022. A sample copy of the letter provided to potentially impacted individuals is included with this letter.

3. Preventative Steps for Future Incidents

In response to the incident, Summit retained a security expert to implement a multiphase series of best practices within their environment. This included deployment of endpoint detection and response software throughout their environment, enhancing encryption, and increasing technological safeguard their email environment. They are in the process of developing disaster recovery and building continuity plans and ensuring there is 24/7 monitoring in place both of which should be completed by March 31, 2022.

4. Point of Contact

Summit is committed to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at richard.goldberg@lewisbrisbois.com.

Sincerely,

Richard W. Goldberg of
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure



Return Mail Processing
PO Box 999
Suwanee, GA 30024

To Enroll, Please Call:
1-(855) 933-2743
Or Visit:
<https://www.experianidworks.com/credit>
Enrollment Code

6 1 862 *****SNGLP

SAMPLE A. SAMPLE - L01

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



February 11, 2022

Dear Sample A. Sample:

I am writing to inform you of a data security incident that may have involved your personal information. Array Marketing takes the privacy and security of its employee information very seriously. Our Information Technology team has implemented a number of security changes to enhance our defenses against the ever-growing threat of cyber security incidents and in response to an incident that affected a limited part of our business. That is why I am notifying you of the incident, offering you credit monitoring and identity monitoring services, and informing you about steps you can take to help protect your personal information.

What Happened? On October 13, 2021, an unauthorized person accessed our computer system in order to interfere with our operations. Although we were subject to a cyber incident, thanks to the decisive actions of our Information Technology team, and with the assistance of third-party cyber security experts, the incident was quickly contained. Working with the cyber-security experts, we conducted a comprehensive investigation intended to gain a fulsome picture of the events and to determine if any personal or otherwise sensitive information may have been affected. While we have no evidence that anyone’s information has been misused, the investigation eventually indicated that your information may have been involved in the incident.

What Information Was Involved? The information involved [Extra2].

What We Are Doing? As soon as we discovered the incident, we took the steps described above. We also notified law enforcement and will continue to cooperate in their investigation of this matter. Out of an abundance of caution, and in an effort to address concerns you may have, we are providing you with access to a credit monitoring and identity theft prevention service. In addition, we are offering you information about steps you can take to help protect your personal information, including free identity monitoring and recovery services for 12 months through Experian as described below.

What You Can Do: You can follow the recommendations included with this letter to protect your personal information. We strongly encourage you to enroll in the credit monitoring and identity monitoring services we are offering through Experian to protect your personal information. To enroll, please visit <https://www.experianidworks.com/credit> or call 1-(855) 933-2743 and provide the following

enrollment code: Representatives are available Monday through Friday from 6 am - 8 pm Pacific Time and Saturday/Sunday from 8 am - 5 pm Pacific Time (excluding all major US holidays). Your 12 months of services will include the following:

What we are doing to protect your information:

To help protect your identity, we are offering a complimentary 12-month membership of Experian's® IdentityWorksSM. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: May 31, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code**:

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **(855) 933-2743** by . Be prepared to provide engagement number as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH 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 agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (855) 933-2743. 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 (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).

* 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.

Please note that this Identity Restoration support is available to you for 12 months 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. You will also find self-help tips and information about identity protection at this site.

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. Additional information describing your services is included with this letter.

Please note you must enroll by May 31, 2022. If you have questions or need assistance, please call Experian at 1-(855) 933-2743.

For More Information: If you have any questions about this letter, please contact 1-(855) 933-2743.

Privacy and the protection of information in our care are both extremely important to us. We will continue to invest in talent and technology to prevent such incidents.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Janis', is positioned above the printed name.

Tom Janis, CFO
Array Marketing Canada

Steps You Can Take to Protect Your Personal Information

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You also can contact one of the following three national credit reporting agencies:

Equifax

P.O. Box 105851
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian

P.O. Box 9532
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion

P.O. Box 1000
Chester, PA 19016
1-800-916-8800
www.transunion.com

Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

Federal Trade Commission

600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov, and
www.ftc.gov/idtheft
1-877-438-4338

Maryland Attorney General

200 St. Paul Place
Baltimore, MD 21202
oag.state.md.us
1-888-743-0023

New York Attorney General

Bureau of Internet and Technology
Resources
28 Liberty Street
New York, NY 10005
1-212-416-8433

North Carolina Attorney General

9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov
1-877-566-7226

Rhode Island Attorney General

150 South Main Street
Providence, RI 02903
<http://www.riag.ri.gov>
1-401-274-4400

Washington D.C. Attorney General

441 4th Street, NW
Washington, DC 20001
oag.dc.gov
1-202-727-3400

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.