



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

JUN 28 2021

CONSUMER PROTECTION

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

June 24, 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 TA Realty LLC ("TA Realty") located at One Federal Street, 17th Floor, Boston, MA 02110, and are writing to notify your office of an incident that may affect the security of some personal information relating to seven (7) 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, TA Realty 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 April 10, 2021, TA Realty became aware of suspicious activity on its computer systems and swiftly launched a response to secure its systems and work with cybersecurity specialists to investigate the nature and scope of the activity. TA Realty also notified law enforcement. The investigation determined that an unauthorized actor gained access to TA Realty's systems between April 7, 2021 and April 10, 2021. On or about April 28, 2021, TA Realty learned that certain personal information of current and former employees may have been viewed by the unauthorized actor. The information that could have been subject to unauthorized access includes name, address, Social Security number and bank account number.

We note that TA Realty is still in the midst of a comprehensive data mining review to determine all individuals with personal information potentially impacted by the event and will continue to address notification requirements as to individuals and regulators as they are identified.

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Notice to New Hampshire Residents

On or about June 22, 2021, TA Realty provided internal notification of this incident to its current employees. TA Realty began providing formal written notice of this incident to affected individuals, which includes seven (7) New Hampshire residents on or about June 24, 2021. 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, TA Realty moved quickly to investigate and respond to the incident, assess the security of TA Realty systems, and notify potentially affected individuals. TA Realty is also working to implement additional safeguards and training to its employees. TA Realty is providing access to credit monitoring services for twenty-four (24) months through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, TA Realty 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. TA Realty 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) 930-4801.

Very truly yours,

A handwritten signature in black ink, appearing to read "Alexander T. Walker". The signature is fluid and cursive, with a large initial "A" and "W".

Alexander T. Walker of
MULLEN COUGHLIN LLC

ATW/jlm

EXHIBIT A



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

<<Mail ID>>

<<Name 1>>

<<Name 2>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<Address 4>>

<<Address 5>>

<<City>><<State>><<Zip>>

<<Country>>

<<Date>>

Re: Notice of Data Security Incident

Dear <<Name 1>>:

TA Realty LLC (“TA Realty”) is writing to inform you of a recent data security incident that may have impacted the security of your personal information. Although at this time there is no indication that your personal information has been misused in relation to this incident, we are providing you with information about the event, our response, and steps you may take to protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

What Happened? On April 10, 2021, TA Realty became aware of suspicious activity on our computer systems. We swiftly launched a response to secure our systems and work with cybersecurity specialists to investigate the nature and scope of the activity. We also notified law enforcement. Our investigation determined that an unauthorized actor gained access to our systems between April 7, 2021 and April 10, 2021. As a result, the intruder may have viewed certain personal information of current and former employees. TA Realty recently identified you as a potentially-affected individual. Although our review is ongoing to identify the types of sensitive information contained in impacted files, we wanted to provide you with this notice at the earliest opportunity.

What Information Was Involved? We determined the following types of your information may be impacted by this incident: <<Data Elements>>, and name contained within a TA Realty 401(k)-related document. Although at this time there is no indication that your personal information has been misused in relation to this incident, TA Realty is providing this notice as a precaution. At this time, we do not have any evidence that any individual has experienced suspicious activity as a result of the incident.

What We Are Doing. Information security is among TA Realty’s highest priorities, and we take this incident very seriously. Upon discovering this incident, we immediately took steps to review and reinforce the security of our systems. We are reviewing existing security policies and have 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 potentially impacted individuals, including you, so that you may take steps to protect your information.

As an added precaution, we are offering you access to credit monitoring and identity theft protection services for twenty-four (24) months at no cost to you through Experian. You will find information on how to enroll in these services in the enclosed “*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, to review your account statements, and monitor your credit reports for suspicious activity and to detect errors. 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 restoration services we are making available to you. While TA Realty 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 855-867-0834, Monday through Friday, 9:00am to 9:00pm Eastern Standard Time (except U.S. holidays). You may also write to TA Realty at One Federal Street, 17th Floor, Boston, MA 02110.

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

Sincerely,

A handwritten signature in cursive script, reading "Scott Dalrymple", followed by a vertical line.

Scott Dalrymple
Chief Financial Officer/Chief Compliance Officer
TA Realty LLC

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

FOR ADULT INDIVIDUALS OVER THE AGE OF EIGHTEEN (18):

To help protect your identity, we are offering a complimentary 24-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: September 14, 2021** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your **activation code: <<Enrollment 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 877-288-8057 by **September 14, 2021**. Be prepared to provide engagement number B014455 as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24-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, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists 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 877-288-8057. 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).

Please note that this Identity Restoration support is available to you for 24 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.

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 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.

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 8 Rhode Island residents impacted by this incident.

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/>.