



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

411 Theodore Fremd, Suite 206S  
Rye, NY 10580

November 17, 2023

**VIA E-MAIL**

Office of the New Hampshire Attorney General  
Consumer Protection & Antitrust Bureau  
33 Capitol Street  
Concord, NH 03301  
E-mail: [DOJ-CPB@doj.nh.gov](mailto:DOJ-CPB@doj.nh.gov)

**Re: Notice of Data Event**

To Whom It May Concern:

We represent Tangoe, Inc. (“Tangoe”) located at 8888 Keystone Crossing, Suite 1300, Indianapolis, Indiana 46240 and are writing to notify your office of an incident that may affect the security of certain personal information relating to one (1) New Hampshire resident. The investigation into this matter is ongoing, and this notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Tangoe 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 November 17, 2022, Tangoe identified suspicious activity related to certain computer systems within its environment. Tangoe immediately took steps to secure the environment and launched an investigation to determine the nature and scope of the incident. The investigation determined that certain computer systems were subject to unauthorized access between November 15, 2022, and November 17, 2022, and that certain files were potentially accessed and/or acquired by an unknown third party without authorization. As a result, Tangoe quickly began a diligent and comprehensive review of relevant systems to determine the information that may have been impacted and to identify to whom it belonged. On September 19, 2023, Tangoe determined that certain documents containing protected information were stored on the impacted systems. Tangoe commenced a closer review of these documents, and that process completed on November 2, 2023. The information that could have been subject to unauthorized access or acquisition includes

### **Notice to New Hampshire Resident**

On or about November 17, 2023, Tangoe began provided written notice of this incident to one (1) New Hampshire resident. Further, additional New Hampshire residents received notice of this incident in accordance with the Health Insurance Portability and Accountability Act. 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, Tangoe moved quickly to investigate and respond to the incident, assess the security of Tangoe systems, and identify potentially affected individuals. Further, Tangoe notified federal law enforcement regarding the event. Tangoe is also working to implement additional safeguards and training to its employees. Tangoe is providing access to credit monitoring services for \_\_\_\_\_, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Tangoe is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Tangoe 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.

Tangoe is providing written notice of this incident to relevant state and federal regulators, as necessary.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at \_\_\_\_\_.

Very truly yours, \_\_\_\_\_

Michele Veltri of  
MULLEN COUGHLIN LLC

MTV:ncl  
Enclosure

# **EXHIBIT A**



Return Mail Processing  
PO Box 999  
Suwanee, GA 30024

6 1 1309 \*\*\*\*\*SNGLP

SAMPLE A. SAMPLE - L02

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



November 17, 2023

**NOTICE OF SECURITY INCIDENT**

Dear Sample A. Sample:

Tangoe US, Inc. (“Tangoe”) is writing to notify you of a security incident that may affect the privacy of some of your information. We are writing to provide you with information about the incident, our ongoing response, and resources available to you to help protect your information, should you feel it appropriate to do so. We sincerely regret any inconvenience or concern this incident may cause you.

**What Happened?** On November 17, 2022, Tangoe identified suspicious activity related to certain computer systems within our environment. We immediately took steps to secure the environment and launched an investigation to determine the nature and scope of the incident. The investigation determined that certain computer systems were subject to unauthorized access between November 15, 2022 and November 17, 2022, and that certain files were potentially accessed and/or acquired by an unknown third party without authorization.

**What Information Was Involved?** As a result, Tangoe quickly began a diligent and comprehensive review of relevant systems to determine the information that may have been impacted and to identify to whom it belonged. Between July 27, 2023, and September 19, 2023, we determined that certain documents containing protected health information related to some former employees and/or dependents were stored on the impacted systems. We commenced a closer review of these documents, and on November 2, 2023, we determined that this incident potentially impacted [redacted]. At this time, we have no indication that your information was subject to actual or attempted misuse as a result of this incident.

**What We Are Doing.** Upon discovery of this incident, we moved quickly to assess the security of our systems and notify potentially affected individuals. As part of our ongoing commitment to the privacy of information in our care, we are working to implement additional security measures to further protect against similar incidents in the future. We will also be notifying regulators, as required.

As an added precaution, we are also offering you complimentary access to two years of credit monitoring and identity theft restoration services through Experian. Please review the instructions contained in the attached *Steps You Can Take to Help Protect Your Information* for additional information on these services.

**What You Can Do.** We encourage you to remain vigilant against identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. You can find out more about how to protect your information in the enclosed *Steps You Can Take to Help Protect Your Information*. You may also enroll in the complimentary credit monitoring services available to you; detailed instructions for enrolling in these services are enclosed.

**For More Information.** If you have additional questions, please call our dedicated assistance line at 855-896-4446 (toll free), Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number

Sincerely,

***Mark Troller***  
***Chief Information Officer***  
***Tangoe US, Inc***

## STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

### Enroll in Monitoring Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorks<sup>SM</sup> for .

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. 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 from the date of the incident (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 Identity Restoration is available to you for 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](http://www.ExperianIDWorks.com/restoration).

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary twenty-four (24)-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at . Be prepared to provide engagement number as proof of eligibility for the Identity Restoration services by Experian.

### **ADDITIONAL DETAILS REGARDING YOUR**

### **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 specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE<sup>TM</sup>:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance<sup>\*\*</sup>:** Provides coverage for certain costs and unauthorized electronic fund transfers.

### 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 a free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their 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 one-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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any of the three major credit reporting bureaus listed below.

\* 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.

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 a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of 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, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, 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	1-800-916-8800
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**

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant 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; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

*For New Mexico residents*, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their 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 consumers’ files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit “prescreened” offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their 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>. You may also write to Tangoe at 8888 Keystone Crossing, Suite 1300, Indianapolis, IN 46240.

*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).