



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

RECEIVED

JAN 19 2021

CONSUMER PROTECTION

Gregory J. Bautista  
Office: (267) 930-1509  
Fax: (267) 930-4771  
Email: [gbautista@mullen.law](mailto:gbautista@mullen.law)

1127 High Ridge Road, #301  
Stamford, CT 06905

January 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 Tighe & Bond, Inc. ("Tighe & Bond") located at 53 Southampton Road, Westfield, MA 01085 and are writing to notify your office of an incident that may affect the security of some personal information relating to sixty-one (61) 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, Tighe & Bond 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 September 17, 2020, Tighe & Bond became aware of suspicious activity on its computer network. Upon discovery, Tighe & Bond conducted an immediate investigation and determined that its network had been infected with malware which prevented access to certain files on the system. In response, Tighe & Bond began working with third-party forensic specialists to assist in the investigation, determine the nature and scope of the incident, and identify what personal information may have been impacted by this incident and to whom the information relates. The investigation determined that the malware was introduced into the system by an unauthorized actor who also accessed and acquired certain files within Tighe & Bond's system. The unauthorized access occurred between August 11, 2020 and September 17, 2020.

Tighe & Bond then began a thorough, lengthy, and labor-intensive process to identify sensitive information that may have been contained within accessible files, and to identify the individuals whose information may have been impacted. This review concluded on December 9, 2020. Thereafter, Tighe & Bond took steps to notify potentially impacted individuals.

[Mullen.law](http://Mullen.law)

The information subject to unauthorized access may vary by individual but includes name, address, date of birth and Social Security number.

### **Notice to New Hampshire Residents**

On January 7, 2021, Tighe & Bond began providing written notice of this incident to potentially affected individuals, which includes sixty-one (61) New Hampshire residents. Written notice will be provided in substantially the same form as the letter attached hereto as *Exhibit A*.

### **Other Steps Taken and To Be Taken**

Upon discovering the event, Tighe & Bond moved quickly to investigate and respond to the incident, assess the security of Tighe & Bond systems, and notify potentially affected individuals. Tighe & Bond is also working to implement additional safeguards and training to its employees. Tighe & Bond is providing complimentary access to credit monitoring services for twenty-four (24) months, through Kroll, to individuals whose personal information was potentially affected by this incident.

Additionally, Tighe & Bond 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. Tighe & Bond 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) 930-1509.

Very truly yours,



Gregory J. Bautista of  
MULLEN COUGHLIN LLC

# **EXHIBIT A**



<<Date>> (Format: Month Day, Year)

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country >>

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>

Tighe & Bond, Inc. (“Tighe & Bond”) is writing to advise you of a recent event that may impact the security of some of your personal information. We are writing to provide you with information about the event, steps taken since its discovery, and what you can do to better protect against the potential misuse of your information, should you feel action is appropriate.

**What Happened?** On September 17, 2020, Tighe & Bond became aware of suspicious activity on its computer network. Tighe & Bond conducted an immediate investigation and determined that its network had been infected with malware. In response, Tighe & Bond began working with third-party cyber forensic specialists to assist in the investigation, determine the nature and scope of the incident, and identify what sensitive information may have been impacted by this incident and to whom the information relates. The investigation determined that the malware was introduced into the system by an unauthorized actor who also accessed and acquired certain files within Tighe & Bond’s system. The unauthorized access occurred between August 11, 2020 and September 17, 2020.

Tighe & Bond then began a thorough, lengthy, and labor-intensive process to identify sensitive information that may have been contained within accessible files, and to identify the individuals whose information may have been impacted. We are notifying you because the investigation determined that certain information relating to you may have been accessible to unauthorized individual(s) during this event.

**What Information Was Involved?** While there is no evidence that information relating to you was subject to actual or attempted misuse, the following information about you was accessible during this event: your name, date of birth, and Social Security number.

**What We Are Doing.** Tighe & Bond is committed to, and takes very seriously, its responsibility to protect all data entrusted to us. As part of our ongoing commitment to the privacy of personal information in our care, we reviewed our existing policies and procedures, and are working to implement additional safeguards to further secure the information contained within our network. Tighe & Bond also notified regulatory authorities, as required by law.

As an added precaution, we are also offering twenty-four (24) months of complimentary access to identity monitoring services through Kroll. If you wish to receive these services, you may activate by following the attached instructions.

**What You Can Do.** Review the enclosed *Steps You Can Take to Help Protect Your Personal Information*. There you will also find information on how to activate the complimentary identity monitoring services being offered to you.

**For More Information.** We understand that you may have questions or concerns that are not addressed in this letter. Please call the dedicated assistance line that we have established regarding this incident by dialing <<1-XXX-XXX-XXXX>> Monday through Friday from 8:00 am to 5:30 pm Central Time, excluding U.S. holidays.

Tighe & Bond sincerely regrets any inconvenience or concern this incident may have caused you.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert S. Belitz". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Robert S. Belitz  
President & CEO  
Tighe & Bond, Inc.



## Steps You Can Take to Help Protect Your Personal Information

### **Activate Your Identity Monitoring**

Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

- Visit <<IDMonitoringURL>> to activate and take advantage of your identity monitoring services.
- *You have until <<Date>> to activate your identity monitoring services.*
- Membership Number: <<Member ID>>

You have been provided with access to the following services from Kroll for two years:

#### Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

#### Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

#### Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

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.

### **Monitor Your Accounts**

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security 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 security 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 security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

#### **Experian**

PO Box 9554  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

#### **TransUnion**

P.O. Box 160  
Woodlyn, PA 19094  
1-888-909-8872

[www.transunion.com/credit-freeze](http://www.transunion.com/credit-freeze)

#### **Equifax**

PO Box 105788  
Atlanta, GA 30348-5788  
1-800-685-1111

[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

Fair Credit Reporting Act. You can review your 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. **New York Residents:** the Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <https://ag.ny.gov/>. **North Carolina Residents:** Office of the Attorney General of North Carolina, Consumer Protection Division, 9001 Mail Service Center Raleigh, NC 27699-9001, [www.ncdoj.gov](http://www.ncdoj.gov), Telephone: 1-919-716-6400, 877-566-7226 (toll free within NC). **Oregon Residents:** Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, [www.doj.state.or.us/](http://www.doj.state.or.us/), Telephone: 877-877-9392. **Rhode Island Residents:** Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, [www.riag.ri.gov](http://www.riag.ri.gov), Telephone: 401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are <<##>> Rhode Island residents impacted by this incident. **Washington D.C. Residents:** the Office of Attorney General for the District of Columbia can be reached at: 441 4thStreet NW, Suite 1100 South, Washington, D.C. 20001; 1-202-442-9828; <https://oag.dc.gov>. **All US Residents:** Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, [www.consumer.gov/idtheft](http://www.consumer.gov/idtheft), 1-877-IDTHEFT (438-4338), TTY: 1-866-653-4261.