

MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

MAR 07 2022

CONSUMER PROTECTION

James Paulino
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75 S. Clinton Avenue, Suite 510
Rochester, NY 14604

March 3, 2022

VIA U.S. MAIL

Consumer Protection Bureau
Office of the New Hampshire Attorney General
33 Capitol Street
Concord, NH 03301

Re: Notice of Potential Data Event

To Whom It May Concern:

We represent Tom Lange Company Inc. ("Tom Lange") located at 500 N. Broadway, Suite 1360, St. Louis, MO 63102, and are writing to notify your office of an incident that may affect the security of some personal information relating to one (1) New Hampshire resident. By providing this notice, Tom Lange 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

Tom Lange discovered unusual activity on certain computer systems hosted with a third-party provider beginning on October 3, 2021. The third-party hosting provider promptly took steps to secure Tom Lange's hosted environment network while Tom Lange, with the assistance of computer forensic specialists, conducted an investigation to determine the nature and scope of the event. The investigation confirmed that an unauthorized actor gained access to a portion of the hosted environment within the third party's network and encrypted network files, as well as accessed various locations prior to deploying the encryption virus.

Given that network locations were accessed without authorization, Tom Lange then undertook a lengthy and thorough review of the potentially impacted information in order to identify the information that was potentially impacted and to whom it related. Tom Lange completed this review on or around February 3, 2022 and confirmed the individual whose information was present. Tom Lange then worked to reconcile the results of the review with internal records in furtherance of identifying the individual to whom the data related and the appropriate contact

information for the individual in order to provide notification to the potentially impacted individual as quickly as possible.

The information involved in Tom Lange systems remotely hosted by the third-party provider that could have been subject to unauthorized access includes name and Social Security number.

Notice to New Hampshire Resident

On or about March 3, 2022 Tom Lange began providing written notice of this incident to the affected individual, which includes one (1) New Hampshire resident. 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

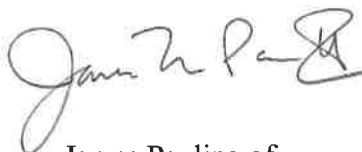
Upon discovering the event, Tom Lange moved quickly to investigate and respond to the incident, assess the security of Tom Lange remote and locally hosted systems, and notify the potentially affected individual. Tom Lange is also working to replace its third-party hosting provider, and to implement additional safeguards and training to its employees. Tom Lange is providing access to credit monitoring services for one (1) year through Experian, to the individual whose personal information was potentially affected by this incident, at no cost to this individual.

Additionally, Tom Lange is providing the impacted individual with guidance on how to better protect against identity theft and fraud. Tom Lange is providing the individual 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. Tom Lange also notified federal law enforcement of the event and is reporting to other regulators, as required.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4741.

Very truly yours,



James Paulino of
MULLEN COUGHLIN LLC

Office of the Attorney General
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Enclosure

EXHIBIT A



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

March 3, 2022

H6130-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01 INDIVIDUAL
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



NOTICE OF [Extra1 - Re Line]

Dear Sample A. Sample:

Tom Lange Company Inc. (“Tom Lange”) is writing you as a current or former employee to notify you of a recent incident that may involve some of your information. This notice provides you with information about the event, our response, and additional steps you may take to protect your information, should you determine it is appropriate to do so. We are also offering you complimentary credit and fraud monitoring, with identity theft insurance, at no cost to you in an abundance of caution; enrollment instructions are provided on the following pages.

What Happened? Tom Lange discovered unusual activity on certain computer systems hosted with a third-party provider beginning on October 3, 2021. Tom Lange, working with the third-party provider, promptly took steps to secure our hosted environment while we, with the assistance of computer forensic specialists, conducted an investigation to determine the nature and scope of the event. The investigation confirmed that an unauthorized actor gained access to a portion of our hosted environment and encrypted network files, as well as accessed various locations prior to deploying the encryption virus. We then undertook a lengthy and time-intensive thorough review of the potentially impacted information to identify any potentially affected individuals, and then to gather contact information to provide this notice, which we completed on February 3, 2022.

Although we have no evidence of actual or attempted misuse of your information, and while we cannot confirm that any specific files containing your information were accessed or acquired, we are notifying you in an abundance of caution, so that you may take steps to protect your information.

What Information Was Involved? The involved Tom Lange systems remotely hosted by the third-party provider contained your name and Social Security number. As stated above, Tom Lange is currently unaware of any actual or even attempted misuse of information.

What We Are Doing. We take this incident very seriously. Information privacy and security are among our highest priorities, and we have strict security measures in place to protect information in our care. Upon discovering this incident, we quickly took steps to investigate and respond, including reviewing and enhancing our existing policies and procedures to reduce the likelihood of a similar future event. Importantly, we are also in the process of replacing our current third-party hosting provider. Moreover, as an added precaution, we are offering complimentary access to credit monitoring and identity restoration services to potentially impacted individuals out of an abundance of caution because your information was determined to be present in the systems that may have been accessed during the incident. Finally, we also reported this incident to federal law enforcement and relevant regulators as required.

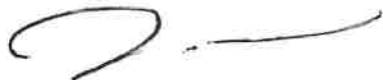
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What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and explanation of benefits and monitoring your free credit reports for suspicious activity. You may also review and consider the information and resources outlined in the below “Steps You Can Take to Help Protect Personal Information” which include information regarding enrollment for the complimentary credit monitoring and identity restoration services.

For More Information. If you have additional questions, please call our dedicated assistance line at (833) 430-2162 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 B028460. You may write to Tom Lange at 500 N. Broadway, Suite 1360, Saint Louis, MO 63102 with any additional questions you may have.

Sincerely,



Josh McKey
Chief Financial Officer
Tom Lange Company Inc.

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring and Identity Restoration Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for twelve (12) months.

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 twelve (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.

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 twelve (12) 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:

- 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: ABCDEFGHI**

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 **(833) 430-2162** by **May 31, 2022**. Be prepared to provide engagement number **B028460** 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™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* 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.

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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, 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 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

Internal Revenue Service Identity Protection PIN (IP PIN)

You may also obtain an Identity Protection PIN (IP PIN) from the Internal Revenue Service, a six-digit number that prevents someone else from filing a tax return using your Social Security number or Individual Taxpayer Identification Number. The IP PIN is known only to you and the IRS, and helps the IRS verify your identity when you file your electronic or paper tax return. Even though you may not have a filing requirement, an IP PIN still protects your account. If you do not already have an IP PIN, you may get an IP PIN as a proactive step to protect yourself from tax-related identity theft either online, by paper application or in-person. Information about the IP PIN program can be found here: <https://www.irs.gov/identity-theft-fraud-scams/get-an-identity-protection-pin>.

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 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/>.

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.

