



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

MAR 12 2021

CONSUMER PROTECTION

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4843 Colleyville Blvd, Suite 251-388
Colleyville, TX 76034

March 5, 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

To Whom It May Concern:

We represent TractManager Holdings LLC, now known as symplr, (“TractManager”) located at 2711 N. Haskell Avenue, #1450, Dallas, Texas 75204, and are writing to notify your office of an incident that may affect the security of some information relating to one (1) New Hampshire resident. 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, TractManager 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 or about January 18, 2021, TractManager determined that information of its employees may have been viewed in connection with an incident in which an unknown third party accessed certain employee mailboxes without authorization. The mailbox storing employee information was accessed without authorization on or about September 11, 2020.

The information that could have been subject to unauthorized access includes employees’ names, addresses, and Social Security numbers.

Notice to New Hampshire Resident

On or about March 5, 2021, TractManager provided written notice of this incident to all affected individuals, 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, TractManager moved quickly to investigate and respond to the incident, assess the security of TractManager email accounts, and notify potentially affected individuals. TractManager is also reviewing its existing policies and procedures and implementing additional safeguards to enhance the security of information in its possession. TractManager is providing access to credit monitoring services for twelve (12) months, through Experian, to individuals whose information was potentially affected by this incident, at no cost to these individuals.

Additionally, TractManager 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. TractManager is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, 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 event, please contact us at (267) 930-1697.

Very truly yours,

A handwritten signature in black ink, appearing to read "Amanda Harvey".

Amanda Harvey of
MULLEN COUGHLIN LLC

EXHIBIT A



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

March 5, 2021

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SAMPLE A. SAMPLE - L04-GENERAL
APT ABC
123 ANY ST
ANYTOWN, ST 12345-6789



Dear Sample A. Sample:

TractManager Holdings LLC, now known as symplr, writes to inform you of a recent incident that may affect your name, address, and Social Security number. While we are unaware of any actual or attempted misuse of your information, we are providing you with information about the incident, our response, and steps you may take to better protect yourself, should you feel it necessary to do so.

What Happened? On or about January 18, 2021, TractManager determined that your information may have been viewed in connection with an incident in which an unknown third party accessed certain employee mailboxes without authorization. The mailbox storing your information was accessed without authorization starting on or about September 11, 2020. Upon first seeing indications of unauthorized access to employee mailboxes, we immediately terminated any unauthorized access and promptly investigated the scope of the incident. The investigation was comprehensive and took time to determine the scope of the incident and the type of information that was impacted.

What Information Was Involved? Although we have discovered no evidence to suggest that your information is being misused, we determined that one of the accessed mailboxes contained information relating to you, including your name, address, and Social Security number.

What Are We Doing? We take this matter and the security of your information very seriously. Out of an abundance of caution, we have reset old passwords and changed email access procedures. As part of our ongoing commitment to the security of information in our care, we are also reviewing our existing policies and procedures and implementing additional safeguards to enhance the security of information in our possession.

As an added precaution, we are also offering you complimentary access to Experian IdentityWorksSM for twelve (12) months. We encourage you to enroll in these services, as we are not able to act on your behalf to enroll you. Please review the instructions contained in the attached *Steps You Can Take to Protect Your Information* for additional information on these services.

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What Can You Do? We encourage you to review the enclosed *Steps You Can Take To Help Protect Your Information* for additional steps you may take and information on what you can do to better protect against the possibility of identity theft and fraud, should you feel it is appropriate to do so. You may also enroll to receive the free credit and identity restoration services we are offering.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call us at (855) 933-2743. You may also write to TractManager at 2711 N. Haskell Ave., #1450, Dallas, Texas 75204.

We sincerely regret any inconvenience or concern this incident has caused.

Sincerely,

David Arnold

David Arnold
Chief Legal Officer
TractManager Holdings LLC

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Enroll in Credit Monitoring

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, 2021**. (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 (855) 933-2743 by May 31, 2021. Be prepared to provide engagement number DB25502 as proof of eligibility for the Identity Restoration services by Experian.

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.¹
- **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 Insurance²:** Provides coverage for certain costs and unauthorized electronic fund transfers.

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 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,

¹ Offline members will be eligible to call for additional reports quarterly after enrolling.

² 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.



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	TransUnion P.O. Box 160 Woodlyn, PA 19094 1-888-909-8872 www.transunion.com/credit-freeze	Equifax PO Box 105788 Atlanta, GA 30348-5788 1-800-685-1111 www.equifax.com/personal/credit-report-services
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To request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your 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 agencies listed below:

Experian P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/fraud/center.html	TransUnion P.O. Box 2000 Chester, PA 19016 1-800-680-7289 www.transunion.com/fraud-victim-resource/place-fraud-alert	Equifax P.O. Box 105069 Atlanta, GA 30348 1-888-766-0008 www.equifax.com/personal/credit-report-services
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Additional Information

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338). 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.

Kentucky Residents: Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118, Frankfort, Kentucky 40601, www.ag.ky.gov, Telephone: 1-502-696-5300. **Maryland Residents:** Office of the Attorney General of Maryland, Consumer Protection Division, 200 St. Paul Place, Baltimore, Maryland 21202, www.oag.state.md.us/Consumer, Telephone: 410-528-8662, 1-888-743-0023 (toll free within MD). **New York Residents:** The Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, New York 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, North Carolina 27699-9001, 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/, Telephone: 877-877-9392. **All US Residents:** Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, D.C. 20580, www.consumer.gov/idtheft, 1-877-IDTHEFT (438-4338).