



**MULLEN** MAY 23 2022  
**COUGHLIN**  
ATTORNEYS AT LAW

RECEIVED

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

May 17, 2022

**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 TurnKey Realty, LLC (“TurnKey”) located at 720 Fayette Street, Suite 200, Conshohocken, PA 19428, and are writing to notify your office of an incident that may affect the security of certain personal information relating to thirty-eight (38) New Hampshire residents. 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, TurnKey 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 September 17, 2021, TurnKey became aware of potentially suspicious activity related to a portion of our computer network. Following this, TurnKey promptly launched an investigation with the assistance of third-party forensic specialists to assess the security of our systems and determine the nature and scope of the activity. This investigation determined that certain files on TurnKey’s systems could have been subject to unauthorized access and/or acquisition from September 10, 2021 to September 11, 2021, but could not determine which specific data was impacted. As a result, TurnKey then embarked on a diligent and comprehensive review of all data at risk to determine: the full universe of information present in the potentially impacted files; to whom the information related; and accurate mailing addresses for all potentially impacted individuals. On April 28, 2022, TurnKey completed this time intensive review.

The information that could have been subject to unauthorized access includes name, Social Security number, driver’s license number, and financial account number.

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

On or about May 17, 2022, TurnKey provided written notice of this incident to thirty-eight (38) New Hampshire residents. 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 discovery, TurnKey moved quickly to investigate and respond to the incident, assess the security of TurnKey systems, and identify potentially affected individuals. TurnKey is also working to implement additional safeguards and training to its employees. TurnKey is providing access to credit monitoring services for twelve (12) months, through Equifax, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, TurnKey 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. TurnKey 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 security event, please contact us at (267) 930-4861.

Very truly yours,

Kevin Dolan of  
MULLEN COUGHLIN LLC

KED/cob  
Enclosure

# **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>>

## NOTICE OF <<VARIABLE HEADER>>

Dear <<Name 1>>:

TurnKey Realty, LLC (“TurnKey”) is a real estate company that provides various real estate and construction services, oftentimes through its parent organization The HOW Group. TurnKey is writing to inform you of an incident that could affect the security of some of your information. While we are unaware of any actual or attempted misuse of your information, we take this incident very seriously and we are providing you with information about the incident, our response to it, and resources available to you to help protect your information, should you feel it appropriate to do so.

### What Happened?

On or about September 17, 2021, TurnKey became aware of potentially suspicious activity related to a portion of our computer network. Following this, we promptly launched an investigation with the assistance of third-party forensic specialists to assess the security of our systems and determine the nature and scope of the activity. This investigation determined that certain files on TurnKey’s systems could have been subject to unauthorized access and/or acquisition from September 10, 2021 to September 11, 2021, but could not determine which specific data was impacted. As a result, TurnKey then embarked on a diligent and comprehensive review of all data at risk to determine: the full universe of information present in the potentially impacted files; to whom the information related; and accurate mailing addresses for all potentially impacted individuals. On April 28, 2022, TurnKey completed this time-intensive review and confirmed that information related to you was potentially impacted by this event.

### What Information Was Involved?

TurnKey determined that the following information related to you was present in the potentially impacted files at the time of the incident: your name and <<data elements>>.

### What We Are Doing.

Data privacy and security are among TurnKey’s highest priorities, and there are extensive measures in place to protect information in our care. Upon discovery, TurnKey promptly commenced an investigation with the assistance of third-party forensic specialists to confirm the nature and scope of this incident. TurnKey is providing notice of this incident to potentially impacted individuals and pertinent state and/or federal regulators. As part of TurnKey’s ongoing commitment to the security of information, all policies and procedures are being reviewed and enhanced where possible, additional safeguards are being implemented, and workforce training is being conducted to reduce the likelihood of a similar event in the future.

As an added precaution, TurnKey is providing you with access to <<CM length>> months of credit monitoring and identity protection services through Equifax at no cost to you. A description of services and instructions on how to enroll can be found within the enclosed *Steps You Can Take to Help Protect Personal Information*. Please note that you must complete the enrollment process yourself, as we are not permitted to enroll you in these services on your behalf.

**What You Can Do.**

You can review the enclosed *Steps You Can Take to Help Protect Personal 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. We encourage you to enroll to receive the complimentary credit monitoring and identity protection services through Equifax. We also encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, explanation of benefits, and credit reports for suspicious activity.

**For More Information.**

We understand you may have questions about this incident that are not addressed in this letter. To ensure your questions are answered in a timely manner, please contact 844-446-1067 between the hours of 9am to 9pm Eastern, Monday through Friday. You may also write to us at: 720 Fayette Street, Ste 200, Conshohocken, PA 19428.

TurnKey takes the privacy and security of the information in our care seriously. We sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

TurnKey Realty, LLC

## STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

### Enroll in Credit Monitoring

Enter your Activation Code: <<ACTIVATION CODE>>

Enrollment Deadline: <<Enrollment Deadline>>

### Equifax Credit Watch™ Gold

\*Note: You must be over age 18 with a credit file to take advantage of the product

### Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications<sup>1</sup> when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts<sup>2</sup>, which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock<sup>3</sup>
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft<sup>4</sup>

### Enrollment Instructions

Go to [www.equifax.com/activate](http://www.equifax.com/activate)

Enter your unique Activation Code of <<ACTIVATION CODE>> then click "Submit" and follow these 4 steps:

1. **Register:**  
Complete the form with your contact information and click "Continue".  
*If you already have a myEquifax account, click the 'Sign in here' link under the "Let's get started" header. Once you have successfully signed in, you will skip to the Checkout Page in Step 4.*
2. **Create Account:**  
Enter your email address, create a password, and accept the terms of use.
3. **Verify Identity:**  
To enroll in your product, we will ask you to complete our identity verification process.
4. **Checkout:**  
Upon successful verification of your identity, you will see the Checkout Page.  
Click 'Sign Me Up' to finish enrolling.  
**You're done!**  
The confirmation page shows your completed enrollment.  
Click "View My Product" to access the product features.

### 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](http://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.

<sup>1</sup>WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded.

<sup>2</sup>The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

<sup>3</sup>Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit [www.optoutprescreen.com](http://www.optoutprescreen.com).

<sup>4</sup>The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

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:

<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>
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](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. 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 District of Columbia residents*, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and [oag@dc.gov](mailto:oag@dc.gov).

*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](http://www.oag.state.md.us). TurnKey is located at 720 Fayette Street, Ste 200, Conshohocken, PA 19428.

*For New Mexico residents*, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your 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 your file is limited; you must give your consent for credit reports to be provided to employers; you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; and you may seek damages from violators. You 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 you to 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.

*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](http://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](http://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 187 Rhode Island residents impacted by this incident.