



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

RECEIVED

NOV 09 2021

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

November 5, 2021

**VIA FIRST-CLASS 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 United Wheels Inc. ("United Wheels") located at 8877 Gander Creek Dr., Miamisburg, OH 45342, and are writing to notify your office of an incident that may affect the security of some personal information relating to approximately eleven (11) New Hampshire residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, United Wheels 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 June 30, 2021, United Wheels was alerted to issues related to the functionality of company systems. United Wheels engaged third-party incident response specialists, including network security specialists and a forensic investigation firm, to assess the security of its systems and to confirm the nature and scope of the incident. Through the investigation, it was determined that an unauthorized actor had access to certain United Wheels systems between June 29, 2021 and June 30, 2021, and encrypted network files. It was further determined that the unauthorized actor acquired certain files from within the United Wheels systems during this timeframe.

United Wheels, with the assistance of third-party document review specialists, identified the impacted files and conducted a thorough review of each file to determine whether personal information was contained therein and to whom that information related. United Wheels also performed a review of its internal records to locate contact information for the identified individuals to provide notice of the data event. On or about October 7, 2021, United Wheels identified that the personal information relating to certain individuals was contained in one or more of the involved files. At this time, there is no indication that any personal information has been disclosed publicly or used for any fraudulent purpose as a result of this incident.

Pursuant to N.H. Rev. Stat. Ann. § 359-C:19, the personal information that may have been subject to unauthorized acquisition includes name and Social Security number.

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

On or about November 5, 2021, United Wheels began providing written notice of this incident to affected individuals, which includes approximately eleven (11) 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 discovering the event, United Wheels moved quickly to investigate and respond to the incident, to assess the security of its systems, to inform the Federal Bureau of Investigation, and to notify potentially affected individuals. In coordination with third-party digital forensic specialists, United Wheels reviewed and enhanced the existing security measures relating to the involved network, isolated and terminated suspicious activity identified on the potentially affected systems and conducted a thorough forensic analysis of these systems. United Wheels also confirmed that patching and updating was current within the involved network, reset all passwords, and confirmed that multi-factor authentication was appropriately implemented.

United Wheels is providing access to credit monitoring services for twenty-four (24) months, through ID Experts, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals. United Wheels notified law enforcement of this incident and has been cooperating with the investigation. Additionally, the notice letter provides impacted individuals with guidance on how to protect against identity theft and fraud. United Wheels 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) 930-4842.

Very truly yours,



Vincent Regan of  
MULLEN COUGHLIN LLC

VFR/rhb  
Enclosure

# EXHIBIT A



P.O. Box 989728  
West Sacramento, CA 95798-9728

To Enroll, Please Call:

1-833-525-2724

Or Visit:

<https://app.idx.us/account-creation/protect>

Enrollment Code: <<Enrollment>>

<<FirstName <<LastName>>  
<<Address1>>  
<<Address2>>  
<<City>>, <<State>> <<Zip>>

November 5, 2021

Re: Notice of <<Variable1>>

Dear <<FirstName <<LastName>>:

We write to notify you, as a precautionary measure, of a security incident that may affect the confidentiality of some of your personal information held in United Wheels computer systems. Although at this time there is no indication that your information has been used for a fraudulent or nefarious purpose in relation to this incident, we are providing you with information about the event, our response to it, and steps you can take in addition to those you take every day to protect your personal information, should you feel it appropriate to do so.

**What Happened?** On June 30, 2021, United Wheels Inc. (“United Wheels”) discovered suspicious activity involving certain company computer systems. We promptly took steps to secure the network and, with the assistance of third-party computer forensic specialists, conducted an investigation to determine the nature and scope of the event. The investigation revealed that an unauthorized “actor” gained access to certain United Wheels computer systems between June 29, 2021 and June 30, 2021 and encrypted network files. It was further determined that certain United Wheels files were acquired by the unauthorized actor during that timeframe. We have identified these files and conducted a thorough review of each file to identify whether personal information was contained in those files and to whom that information related. On or around October 7, 2021, after a thorough review we determined that certain personal information related to you was contained in one or more of the involved files.

**What Information Was Involved?** The investigation determined the following types of personal information related to you were contained in the involved files: your name and <<data elements>>.

**What We Are Doing.** Safeguarding the privacy of information held in our care and the security of our network is among our company’s highest priorities. We have strict security measures in place to protect information in our care. Upon learning of this incident, we immediately shut down impacted systems, reset passwords, notified law enforcement, and brought in third-party specialists to investigate and remediate the matter. We also took action to further enhance our security measures already in place to protect our network systems and data.

As an added precaution, we are offering you access to 24 months of credit monitoring and identity theft protection services through IDX at no cost to you. If you wish to activate these services, please follow the instructions included in the attached *Steps You Can Take to Protect Personal Information*. We encourage you to enroll in these services as we are unable to act on your behalf to do so.



**What You Can Do.** At this time, there is no indication that your information has been disclosed publicly or used for any fraudulent or nefarious purpose as a result of this incident. We encourage you nonetheless to remain vigilant against potential incidents of identity theft and fraud by reviewing your personal account statements and monitoring your free credit reports for suspicious activity and reporting any such activity to law enforcement. We also encourage you to enroll in the complimentary credit monitoring services that we are providing to you. Please also review the information contained in the enclosed *Steps You Can Take to Protect Personal Information*.

**For More Information.** We understand that you may have questions about this incident that are not addressed in this letter. If so, please contact our toll-free dedicated assistance line at 1-833-525-2724 9:00 am to 9:00 pm Eastern Time, Monday through Friday (excluding some U.S. national holidays). You may also address written questions to: General Counsel, United Wheels at 8877 Gander Creek Dr., Miamisburg, OH 45342, or by email at [gc@unitedwheels.com](mailto:gc@unitedwheels.com).

Sincerely,

United Wheels Inc.

## STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

### Enroll in Identity Protection Services

**1. Website and Enrollment.** Go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Please note the deadline to enroll is February 5, 2022.

**2. Activate the credit monitoring** provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

**3. Telephone.** Contact IDX at 1-833-525-2724 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

These services include 24 months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services.

### 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.

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. If you have already been a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning that 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). *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 violator. 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 15 Rhode Island residents impacted by this incident.