



MULLEN
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ATTORNEYS AT LAW

RECEIVED
FEB 15 2022
CONSUMER PROTECTION

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

February 11, 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 Utility Trailer Manufacturing Company (“UTM”) located at 17295 Railroad Street, Suite A, City of Industry, CA 91748, and are writing to notify your office of an incident that may affect the security of some personal information relating to approximately 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, UTM 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 April 25, 2021, UTM became aware of suspicious activity impacting its computer systems. UTM immediately commenced an investigation to confirm the nature and scope of the incident. The investigation determined that an unknown actor may have viewed and taken certain information during a period of unauthorized access on its computer systems between April 5 and April 25, 2021. UTM then conducted a thorough and time-consuming review of the accessible files to determine if they contained sensitive information and to whom the information related to. After conducting this thorough and comprehensive review, UTM determined on or around November 23, 2021 that some sensitive information may have been included in the potentially impacted computer systems. UTM then quickly worked to notify the identified individuals.

The information that could have been subject to unauthorized access includes name, address, and Social Security number.

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Notice to New Hampshire Resident

On or about February 11, 2022, UTM provided written notice of this incident to all affected individuals, which includes approximately 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, UTM moved quickly to investigate and respond to the incident, assess the security of UTM systems, and notify potentially affected individuals. UTM is also working to implement additional safeguards and training to its employees. UTM is providing access to credit monitoring services for one (1) year, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, UTM 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. UTM 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) 930-4554.

Very truly yours,



Matthew V. Toldero of
MULLEN COUGHLIN LLC

MVT/dle
Enclosure

Exhibit A



The First Name In Trailers

<<Vendor Return Mail Address>>

<<Original First Name>> <<Original Middle Name>> <<Original Last Name>>

<<Address 1>>

<<Address 2>>

<<Date>>

<<City>>, <<State>> <<Zip>>

Re: Notice of <<Variable Header>>

Dear <<Original First Name>> <<Original Middle Name>> <<Original Last Name>>:

Utility Trailer Manufacturing Company (“UTM”) is writing to notify you of an incident that may impact the security of some of your information. While we are unaware of any actual misuse of your information, we are providing you with notice of the incident, steps we are taking in response, and resources available to help you better protect your information, should you feel it is appropriate to do so.

What Happened? On or about April 25, 2021, UTM became aware of suspicious activity impacting its computer systems. UTM immediately commenced an investigation to confirm the nature and scope of the incident. The investigation determined that an unknown actor may have viewed and taken certain information during a period of unauthorized access on its computer systems between approximately April 5 and April 25, 2021. UTM then conducted a thorough and time-consuming review of the accessible files to determine if they contained sensitive information and to whom the information related to. After conducting this thorough and comprehensive review, UTM determined on or around November 23, 2021 that some of your information may have been included in the potentially impacted computer systems.

What Information Was Involved? The information present in the files that were impacted by the incident may have included your <<data elements>>, address, name.

What We Are Doing. UTM treats its responsibility to safeguard information in its possession as an utmost priority. As such, UTM responded immediately to this event and has been working diligently to provide you with an accurate and complete notice of the incident as soon as possible. UTM’s response to this event also included prompt reporting to federal law enforcement. As part of its ongoing commitment to the privacy and security of personal information in our care, UTM is reviewing its existing policies and procedures relating to data protection and security. UTM is also investigating additional security measures to mitigate any risk associated with this incident and to better prevent future incidents. We are providing notice of this event to potentially impacted individuals and to state regulators, where required.

Out of an abundance of caution, we are providing you with twelve (12) months of complimentary access to credit monitoring and identity restoration services through Experian, as well as guidance on how to better protect your information, should you feel it is appropriate to do so. While UTM is covering the cost of these services, due to privacy restrictions, you will need to complete the activation process yourself.

What You Can Do. You can find out more about how to safeguard your information in the enclosed *Steps You Can Take to Protect Personal Information*. UTM encourages you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. UTM also encourages you to enroll in the complementary credit monitoring and identity restoration services. Enrollment instructions are enclosed with this letter.

For More Information. If you have additional questions, please contact our dedicated assistance line at <<call center TFN>>, Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays). You may also write to UTM at 17295 E. Railroad, City of Industry, California 91748.

Sincerely,

Utility Trailer Manufacturing Company

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 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 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 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** [Enrollment End Date] (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: [Enrollment URL]
- Provide your **activation code**: [Activation Code]

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 [Experian TFN] by [Enrollment End Date]. Be prepared to provide engagement number [DB#####] as proof of eligibility for the Identity Restoration services by Experian.

Additional Details Regarding Your 12 Month 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 ExtendCARETM:** 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.

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

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 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, 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.