



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

JUN 21 2022

CONSUMER PROTECTION

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

June 15, 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 Unified Resources, Inc. ("Unified Resources") located at 10665 Richmond Avenue, Suite 130, Houston, TX 77042, and are writing to notify your office on behalf of itself and its customer, White River Marine Group, of an incident that may affect the security of certain personal information relating to one (1) New Hampshire resident. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Unified Resources 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

Unified Resources provides marketing services to various customers, and managed a web application that collected forms submitted through a branded White River Marine Group program website. On or about May 2, 2022, Unified Resources learned that there was a vulnerability, due a configuration error, in this application, which made the information accessible without appropriate credentials. Upon learning of the event, Unified Resources began an internal investigation and secured the information that was accessible. Further, Unified Resources began working with third-party specialists to investigate the nature and scope of the issue. On or around May 18, 2022, Unified Resources learned that individuals residing in New Hampshire were impacted. Although it could not be confirmed precisely when the information first became available, the earliest sensitive data uploaded through the application dates to February 5, 2020.

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

Notice to New Hampshire Resident

On or about June 15, 2022, Unified Resources began providing written notice of this incident to 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, Unified Resources moved quickly to investigate and respond to the incident, assess the security of Unified Resources systems, and identify potentially affected individuals. Unified Resources is also working to implement additional safeguards and training to its employees. Unified Resources is providing access to credit monitoring services for 24 months, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Unified Resources is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Unified Resources is providing individuals with information on how to place a fraud alert and credit 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.

Unified Resources is providing written notice of this incident to relevant state regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at: (267) 930-4776.

Very truly yours,

Edward J. Finn of
MULLEN COUGHLIN LLC

EJF/jls
Enclosure

EXHIBIT A



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

June 14, 2022



H9839-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345

SAMPLE A SAMPLE - L01 U.S. LETTER

APT ABC

123 ANY STREET

ANYTOWN, ST 12345-6789



Notice of Security Incident

Dear Sample A. Sample:

Unified Resources, Inc. ("Unified Resources") is providing notice of a recent event that may affect the security of some of your information. We have your data because you submitted a form through a website that we manage, in order to join or participate in certain White River Marine Group programs such as the State Team Program and Tournament Reward Programs. We are providing you with information about the event, our response, and additional measures you can take to help protect your information, should you feel it appropriate to do so.

What Happened. On or about May 2, 2022, Unified Resources learned that there was a configuration error in our website application which would allow the public to access some of the information within the application. Upon learning of the event, we began an internal investigation and immediately removed the information that was accessible to the public. Further, we worked with a third-party forensics firm to conduct an investigation. On or around May 18, 2022, Unified Resources completed its review and confirmed that your information was stored on the impacted application.

What Information Was Involved. Our investigation determined that the following types of information related to you were present in the application at the time of the event: name and [Extra1].

What We Are Doing. We take this event and the security of information in our care seriously. Upon learning of this event, we promptly took steps to investigate and respond, assess the security of our systems, and notify individuals whose data was accessible. In response to this event, we are reviewing and enhancing our information security policies and procedures. As well, modifications have been made to the subject applications changing the way this type of required data is collected.

As an additional precaution, Unified Resources is offering you access to 24 months of complimentary credit monitoring and identity restoration services through Experian. Details of this offer and instructions on how to activate these services are enclosed with this letter.

What You Can Do. We encourage 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. Please also review the enclosed *Steps You Can Take to Help Protect Personal Information*, which contains information on what you can do to safeguard against possible misuse of your information. You can also enroll in the credit monitoring services that we are offering.

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H9839-L01

For More Information. If you have additional questions, you may call our toll-free assistance line at (833) 256-3152 Monday through Friday from 8:00 am to 10:00 pm and Saturday through Sunday from 10:00 am to 7:00 pm Central (excluding U.S. holidays). You may also write to Unified Resources at P.O. Box 421559, Houston, TX 77242-1559.

Sincerely,

Chief Financial Officer, Unified Resources, Inc.

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Experian Credit Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 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 24 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 24-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 September 30, 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**:

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) 256-3152 by September 30, 2022. Be prepared to provide engagement number as proof of eligibility for the Identity Restoration services by Experian.

Additional details regarding your 24-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.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 ExtendCARETM:** 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

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.

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.



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 credit 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 fraud alert or 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 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.