



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

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

November 21, 2024

**VIA E-MAIL**

Office of the New Hampshire Attorney General  
Consumer Protection & Antitrust Bureau  
33 Capitol Street  
Concord, NH 03301  
E-mail: [DOJ-CPB@doj.nh.gov](mailto:DOJ-CPB@doj.nh.gov)

**Re: Notice of Data Event**

To Whom It May Concern:

We represent Daleville Dental II LLC (“Daleville”) located at 526 North Daleville Avenue, Daleville, Alabama 36322, and are writing to notify your office of an event that may affect the security of certain information relating to approximately three (3) New Hampshire residents. This notice may be supplemented if any new significant facts are learned subsequent to its submission. By providing this notice, Daleville 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 around November 7, 2023, Daleville identified unusual activity within its computer network. In response, Daleville promptly began taking steps to respond to and investigate the event. Through its investigation, on November 10, 2023, Daleville confirmed that certain files were copied from its system without authorization on or about November 7, 2023.

With the assistance of a third-party vendor, Daleville conducted a detailed review of the data stored in the potentially impacted files to determine what information was affected and to whom the information relates. That review completed on October 28, 2024. The scope of New Hampshire residents was confirmed on November 6, 2024 following receipt of the notification vendor’s correlation of the address information provided by Daleville with the U.S. Postal Service’s National Change of Address Database.

The information that could have been subject to unauthorized access includes

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

On January 5, 2024, Daleville provided preliminary notice of this event on its website and media notice.

On or about November 21, 2024, Daleville provided written notice of this event to approximately three (3) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*. Daleville also updated its website posting and provided updated notice to the Alabama media.

### **Other Steps Taken and To Be Taken**

Upon becoming aware of the event, Daleville moved quickly to investigate and respond to the event, assess the security of Daleville systems, and identify potentially affected individuals. Further, Daleville notified federal law enforcement regarding the event. Daleville is also working to implement additional safeguards and training to its employees. Daleville is providing access to credit monitoring services for \_\_\_\_\_, through Equifax, to individuals whose personal information was potentially affected by this event, at no cost to these individuals.

Additionally, Daleville is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Daleville 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.

Daleville is providing written notice of this event to relevant state and federal regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion. Daleville also notified the U.S. Department of Health and Human Services and prominent media, in Alabama, pursuant to the Health Insurance Portability and Accountability Act ("HIPAA").

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at \_\_\_\_\_.

Very truly yours,

Jillian Seifrit of  
MULLEN COUGHLIN LLC

# **EXHIBIT A**

**Daleville Dental II LLC**

Secure Processing Center  
P.O. Box 3826  
Suwanee, GA 30024

Postal Endorsement Line  
<<Full Name>>  
<<Address 1>>  
<<Address 2>>  
<<Address 3>>  
<<City>>, <<State>> <<Zip>>  
<<Country>>  
\*\*\*Postal IMB Barcode

<<Date>>

**Notice of <<Variable Header>>**

Dear <<Full Name>>:

Daleville Dental II LLC (“Daleville”) is providing notice of an event that may affect some of your information. Although we have no indication that your information has been fraudulently misused for identify theft or fraud in relation to this event, 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 November 7, 2023, Daleville identified unusual activity in our computer network. In response, we promptly began taking steps to respond to and investigate the event. Through our investigation, on November 10, 2023, we confirmed that certain files were copied from our system without authorization on or about November 7, 2023.

With the assistance of a third-party vendor, we conducted a detailed review of the data stored in the potentially impacted files to determine what information was affected and to whom the information relates. This review was recently completed.

**What Information Was Involved?** Our investigation determined that the following types of information related to you were present in the involved files at the time of the event:

**What We Are Doing.** Along with providing the highest quality patient care, the confidentiality, privacy, and security of information within our systems are among our highest priorities. Upon becoming aware of this event, we promptly took steps to investigate and respond and assess the security of our systems. In response to this event, we are reviewing and enhancing our information security policies and procedures.

Daleville is offering you access to \_\_\_\_\_ of complimentary credit monitoring and identity restoration services through Equifax. 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 explanation of benefits under your health insurance, and monitoring your free credit reports for suspicious activity and to detect errors.

Additional resources can be found enclosed in the *Steps You Can Take to Help Protect Personal Information*. You may also enroll in the complimentary credit monitoring services being offered.

**For More Information.** If you have additional questions, you may contact our dedicated assistance line toll-free at . This toll-free line is available Monday through Friday 8:00 a.m. to 8:00 p.m. Central Time (excluding major U.S. holidays). You may also write to us at 526 North Daleville Avenue, Daleville, AL 36322.

Sincerely,

Daleville Dental II LLC

## STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

### Enroll in Monitoring Services



<<Full Name>>

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.

<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.

## **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 a free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any 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 a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of 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 they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, 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>
1-888-298-0045	1-888-397-3742	1-800-916-8800
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**

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect their personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state attorney general. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state attorney general. This notice has not been delayed by law enforcement.

*For Massachusetts Residents*, under Massachusetts law, consumers have the right to obtain a police report in regard to this event. If a consumer is the victim of identity theft, they also have the right to file a police report and obtain a copy of it. Kindly note that Daleville does not have a police report to provide.

*For New Mexico Residents*, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their 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 consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their 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; 1-919-716-6400; 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, individuals have the right to obtain any police report filed in regard to this event. There are approximately <<RI Count>> Rhode Island residents that may be impacted by this event.