



MULLEN
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October 30, 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

Re: Notice of Data Event

To Whom It May Concern:

We represent Minuteman Senior Services (“MSS”), located at 1 Burlington Woods Drive, Suite 101, Burlington, MA 01803, and write to notify your office of an event that may affect the confidentiality of certain information relating to New Hampshire residents. This notice may be supplemented if significant new facts are learned subsequent to its submission. By providing this notice, MSS 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

In June of 2022, MSS identified suspicious activity related to an employee’s email account. MSS promptly undertook an extensive investigation to determine the nature and scope of the event. The investigation determined that an employee’s email account was accessible by an unknown individual for less than 24 hours on June 1, 2022.

The investigation did not confirm conclusively that any information was actually viewed or taken without authorization during the event. Nonetheless, in an abundance of caution, MSS undertook a comprehensive, programmatic and manual review of the contents of the email account, with the assistance of data review specialists, to determine whether sensitive information was contained within the account. This exhaustive review involved the detailed assessment of many thousands of source documents. Following the third-party data mining exercise, MSS engaged in a complex, manual process to validate the data, identify the individuals whose information was contained

within the account, and confirm mailing address information. MSS' internal review and validation process was recently completed.

To ensure compliance with applicable regulations while the data review was ongoing, MSS notified and complied with the requirements of its primary federal regulator, the U.S. Department of Health and Human Services, and posted notice of the event on its website on July 29, 2022.

The personal information related to New Hampshire residents that was accessible during the event includes the following:

Notice to New Hampshire Residents

As noted above, MSS began providing initial notice of the event to potentially affected individuals on July 29, 2022, while the investigation was ongoing. On October 30, 2024, MSS continued providing notice by mailing letters to potentially impacted individuals, including two (2) New Hampshire residents whose personal information was potentially affected. 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 becoming aware of the event, MSS moved quickly to investigate and respond, secure the impacted email account, and identify potentially affected individuals. As part of its ongoing commitment to information security, MSS also enhanced its existing policies and procedures and implemented additional administrative and technical safeguards to further secure the information in its care. MSS also fully cooperated with the ongoing investigation of the U.S. Department of Health and Human Services.

MSS established a dedicated assistance telephone line to assist notified individuals with questions regarding the event and the resources available to them.

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

MSS is providing written notice of this event to appropriate state privacy regulators. MSS is also providing supplemental notice to the U.S. Department of Health and Human Services.

Office of the New Hampshire Attorney General

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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,

Craig Steen of
MULLEN COUGHLIN LLC

CGS/aml
Enclosure