



Melissa K. Ventrone
T (312) 360-2506
Email: mventrone@clarkhill.com

Clark Hill
130 E. Randolph Street, Suite 3900
Chicago, Illinois 60601
T (312) 985-5900
F (312) 985-5999

July 22, 2024

VIA USPS

Attorney General Andrea Campbell
Office of the Attorney General
Consumer Protection Division
Attn: Data Breach Notification
One Ashburton Place
Boston, MA 02108-1518

Office of Consumer Affairs and Business Regulation
501 Boylston Street
Suite 5100
Boston, MA 02116

To Whom It May Concern:

We represent Clear Rate Communications, LLC ("Clear Rate") as Outside Counsel with respect to a data security incident involving the potential exposure of personal information described in more detail below. Clear Rate, located at 2600 W Big Beaver Rd., Suite 450, Troy, Michigan 48084 is a telecommunications company. Clear Rate is committed to answering any questions you may have about this incident, its response, and steps taken to prevent a similar incident in the future.

1. Nature of security incident.

On May 22, 2024, Clear Rate discovered suspicious activity on its systems. Clear Rate implemented its incident response protocols and began an internal investigation. External computer forensic specialists were engaged to help with determining what occurred and whether any information was at risk. On June 5, 2024, Clear Rate learned that some documents may have been taken from its network, which may have included information associated with current and former employees. The potentially impacted data includes the following: name, address, Social Security number, date of birth, driver's license information, health insurance information, and passport number.

2. Number of residents affected.

One (1) Massachusetts resident was notified of this incident. A notification letter was sent to the potentially affected individual on July 22, 2024 (a copy of the form notification letter is enclosed as Exhibit A).

3. Steps taken in response to the incident.

Clear Rate took steps to address this incident and to prevent similar incidents from happening in the future, including changing all passwords and deploying enhanced endpoint monitoring software. The FBI was also notified of this incident. Additionally, the affected individual was offered 24 months of credit monitoring and identity protection services through TransUnion.

July 22, 2024
Page 2

Clear Rate maintains a Written Information Security Program as defined under Massachusetts regulations (201 CMR 17.00).

4. Contact information.

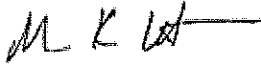
Clear Rate takes the security of the information in its control seriously and is committed to ensuring information within its control is protected. If you have any questions or need additional information, please do not hesitate to contact me at mventrone@clarkhill.com or (312) 360-2506.

Certification of Credit Monitoring Services

On behalf of Clear Rate Communications, LLC, I hereby certify that credit monitoring services were provided to consumers in compliance with G.L. c. 93H, section 3A.

Sincerely,

CLARK HILL



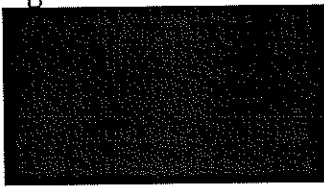
Melissa K. Ventrone
Member

cc: Mariah Leffingwell – mleffingwell@clarkhill.com

Clear Rate Communications Inc
c/o Cyberscout
PO Box 1286
Dearborn, MI 48120-9998



Service and speed is in our fiber.



July 22, 2024

Dear [REDACTED]

We are writing to let you know about a data security incident that may have impacted your name, address, Social Security number, date of birth, and limited benefits information. Clear Rate Communications, Inc. ("Clear Rate") takes the privacy and security of your information seriously, we and sincerely apologize for any concern or inconvenience this may cause you. We may have this information if you previously worked for Clear Rate. This letter contains information about steps you can take to protect your information and resources we are making available to help you.

We are offering you with access to Single Bureau Credit Monitoring/Single Bureau Credit Report/Single Bureau Credit Score services at no charge. These services provide you with alerts for twenty-four (24) months from the date of enrollment when changes occur to your credit file. This notification is sent to you the same day that the change or update takes place with the bureau. Finally, we are providing you with proactive fraud assistance to help with any questions that you might have or in event that you become a victim of fraud. These services will be provided by Cyberscout, a TransUnion company, specializing in fraud assistance and remediation services.

To enroll in Credit Monitoring services at no charge, please log on to <https://www.mytrueidentity.com> and follow the instructions provided. When prompted please provide the following unique code to receive services:



In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter. The enrollment requires an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

Under Massachusetts law, you have the right to obtain any police report filed regarding this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

You may also place a security freeze on your credit reports, free of charge. A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services. Under federal law, you cannot be charged to place, lift, or remove a security freeze.

You must place your request for a freeze with each of the three major consumer reporting agencies: Equifax (www.equifax.com); Experian (www.experian.com); and TransUnion (www.transunion.com). To place a security freeze on your credit report, you may send a written request by regular, certified or overnight mail at the addresses below. You may also place a security freeze through each of the consumer reporting agencies' websites or over the phone, using the contact information below:

000010102G0400

P

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-349-9960

<https://www.equifax.com/personal/cr-edit-report-services/>

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742

<https://www.experian.com/freeze/center.html>

TransUnion Security Freeze
P.O. Box 160
Woodlyn, PA 19094
1-888-909-8872

<https://www.transunion.com/cr-edit-freeze>

In order to request a security freeze, you will need to provide some or all of the following information to the credit reporting agency, depending on whether you do so online, by phone, or by mail:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security Number;
3. Date of birth;
4. If you have moved in the past five (5) years, the addresses where you have lived over the prior five years;
5. Proof of current address, such as a current utility bill, telephone bill, rental agreement, or deed;
6. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.);
7. Social Security Card, pay stub, or W2;
8. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

The credit reporting agencies have one (1) to three (3) business days after receiving your request to place a security freeze on your credit report, based upon the method of your request. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with a unique personal identification number (PIN) or password (or both) that can be used by you to authorize the removal or lifting of the security freeze. It is important to maintain this PIN/password in a secure place, as you will need it to lift or remove the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, you must make a request to each of the credit reporting agencies by mail, through their website, or by phone (using the contact information above). You must provide proper identification (including name, address, and social security number) and the PIN number or password provided to you when you placed the security freeze, as well as the identities of those entities or individuals you would like to receive your credit report. You may also temporarily lift a security freeze for a specified period of time rather than for a specific entity or individual, using the same contact information above. The credit bureaus have between one (1) hour (for requests made online) and three (3) business days (for request made by mail) after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must make a request to each of the credit reporting agencies by mail, through their website, or by phone (using the contact information above). You must provide proper identification (name, address, and social security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have between one (1) hour (for requests made online) and three (3) business days (for requests made by mail) after receiving your request to remove the security freeze.

We want to assure you that we are taking steps to prevent a similar incident from happening in the future. Since the incident, we deployed enhanced endpoint monitoring software, performed a global password reset, and implemented additional security controls.

For More Information:

If you have any questions or concerns, please call Transunion at 1-800-405-6108 Monday through Friday from 8:00 am - 8:00 pm Eastern Time, excluding holidays. Your trust is our top priority, and we deeply regret any inconvenience or concern that this matter may cause you.



Sincerely,

Stephen Oyer

CEO

Clear Rate Communications, LLC

00001020280000

P