

Dominic A. Paluzzi
Direct Dial: 248.220.1356
E-mail: dpaluzzi@mcdonaldhopkins.com

McDonald Hopkins PLC
39533 Woodward Avenue
Suite 318
Bloomfield Hills, MI 48304

P 1.248.646.5070
F 1.248.646.5075

December 16, 2022

RECEIVED

DEC 21 2022

VIA U.S. MAIL

John M. Formella
Office of the Attorney General
Consumer Protection Bureau
33 Capitol Street
Concord, NH 03301

CONSUMER PROTECTION

Re: Bethany Christian Services – Incident Notification

Dear Mr. Formella:

McDonald Hopkins PLC represents Bethany Christian Services located at 901 Eastern Ave NE, Grand Rapids, Michigan. I am writing to provide notification of an incident related to a Bethany Christian Services franchisee that may affect the security of personal information of four (4) New Hampshire residents. By providing this notice, Bethany Christian Services does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

On around June 30, 2022 an unauthorized party accessed a limited number of Bethany Christian Services email accounts. Upon detecting the incident, Bethany Christian Services commenced an immediate and thorough investigation. As part of the investigation, Bethany Christian Services worked to identify what personal information, if any, might have been present in the accessed systems.

After an extensive investigation and manual document review, Bethany Christian Services determined on October 21, 2022 that the systems accessed contained personal information pertaining to a limited number of individuals, such as full names, Social Security numbers, dates of birth, financial account or credit/debit card information, and driver's license or state identification number.

Bethany Christian Services provided the affected New Hampshire residents with written notification of this incident commencing on December 15, 2022, in substantially the same form as the letter attached hereto.

Bethany Christian Services is not aware of any reports of identity fraud or improper use of personal information as a direct result of this incident. However, out of an abundance of caution, Bethany Christian Services wanted to inform your Office (and the affected residents) of the incident. Notified individuals have been provided with best practices to protect their

December 16, 2022

Page 2

information, including but not limited to complimentary credit monitoring services which were provided to those individuals whose Social Security numbers may have been impacted by this incident.

At Bethany Christian Services, protecting the privacy of personal information is a top priority. Bethany Christian Services is committed to maintaining the privacy of personal information in its possession and has taken precautions to safeguard it. Bethany Christian Services continually evaluates and modifies its practices to enhance the security and privacy of the personal information it maintains.

Should you have any questions regarding this notification, please contact me at (248) 220-1356 or dpaluzzi@mcdonaldhopkins.com. Thank you for your cooperation.

Sincerely,

Dominic A. Paluzzi

Encl.

Bethany Christian Services
Return Mail to IDX
10300 SW Greenburg Rd. Suite 570
Portland, OR 97223



To Enroll, Please Call:

Or Visit:

Enrollment Code:

December 15, 2022

Dear [REDACTED]

The privacy and security of the personal information we maintain is of the utmost importance to Bethany Christian Services. We are writing with important information regarding a recent data security incident that involved some of your information. We want to provide you with information about the incident, inform you about the services we are providing to you, and let you know that we continue to take significant measures to protect your information.

What Happened?

Bethany Christian Services detected unauthorized access into a limited number of email accounts.

What We Are Doing.

Upon learning of this issue, we contained the threat by disabling all unauthorized access to the system and immediately commenced a prompt and thorough investigation. As part of our investigation, we have been working very closely with external cybersecurity professionals experienced in handling these types of incidents to analyze the extent of any compromise of the information on our network. After an extensive forensic investigation and manual document review, we discovered on October 21, 2022 that the email accounts that were accessed on or around June 30, 2022 contained some of your personal information. **However, it was not able to be confirmed that your information was actually accessed, and we have no evidence that any of your information has been misused.**

What Information Was Involved.

Based on our comprehensive investigation and manual document review, we determined that the compromised email accounts contained your name [REDACTED]

What You Can Do.

To protect you from potential misuse of your information, we are offering complimentary identity theft protection services through IDX. IDX identity protection services include: [REDACTED] of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised. Please note the deadline to enroll is [REDACTED].

This letter also provides precautionary measures you can take to protect your personal information, including placing a fraud alert and security freeze on your credit files, and obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis.

For More Information.

Please accept our apologies that this incident occurred. We remain fully committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices to enhance the security and privacy of your personal information.

You will find detailed instructions for enrollment on the enclosed Other Important Information document. Also, you will need to reference the enrollment code at the top of this letter when calling or enrolling online, so please do not discard this letter. Please call [REDACTED] or go to [REDACTED] for assistance or for any additional questions you may have. IDX representatives are available Monday through Friday from 9 am -9 pm Eastern Time.

Sincerely,

Bethany Christian Services
901 Eastern Ave NE, Grand Rapids, Michigan
[REDACTED]

- OTHER IMPORTANT INFORMATION -

1. Enrolling in Complimentary Credit Monitoring.

1. Website and Enrollment. Go to [REDACTED] and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

3. Telephone. Contact IDX at [REDACTED] to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

4. Review your credit reports. We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

You should also know that you have the right to file a police report if you ever experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

2. Placing a Fraud Alert on Your Credit File.

Whether or not you choose to use the complimentary [REDACTED] credit monitoring services, we recommend that you place an initial one (1) year "fraud alert" on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

Equifax

P.O. Box 105069
Atlanta, GA 30348

<https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>
(800) 525-6285

Experian

P.O. Box 9554
Allen, TX 75013

<https://www.experian.com/fraud/center.html>
(888) 397-3742

TransUnion LLC

P.O. Box 2000
Chester, PA 19016-2000

<https://www.transunion.com/credit-freeze>
(800) 680-7289

3. Placing a Security Freeze on Your Credit File.

If you are very concerned about becoming a victim of fraud or identity theft, you may request a "security freeze" be placed on your credit file, at no charge. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by contacting all three nationwide credit reporting companies at the numbers below and following the stated directions or by sending a request in writing, by mail, to all three credit reporting companies:

Equifax Security Freeze

P.O. Box 105788

Atlanta, GA 30348

<https://www.equifax.com/personal/credit-report-services/credit-freeze/>

(800) 349-9960

Experian Security Freeze

P.O. Box 9554

Allen, TX 75013

<http://experian.com/freeze>
(888) 397-3742**TransUnion Security Freeze**

P.O. Box 160

Woodlyn, PA 19094

<https://www.transunion.com/credit-freeze>
(888) 909-8872

In order to place the security freeze, you'll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

If you do place a security freeze *prior* to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

4. Obtaining a Free Credit Report.

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at www.annualcreditreport.com. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

5. Additional Helpful Resources.

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at www.ftc.gov/idtheft, by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name, or to commit fraud or other crimes against you, you may file a police report in the city in which you currently reside.

Maryland Residents: You may obtain information about avoiding identity theft from the Maryland Attorney General's Office: Office of the Attorney General of Maryland, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 888-743-0023.

New York Residents: You may obtain information about preventing identity theft from the New York Attorney General's Office: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; <https://ag.ny.gov/consumer-frauds-bureau/identity-theft>; Telephone: 800-771-7755.

Oregon Residents: You may obtain information about preventing identity theft from the Oregon Attorney General's Office: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392

Washington D.C. Residents: You may obtain information about preventing identity theft from the Office of the Attorney General for the District of Columbia, 400 6th Street NW, Washington D.C. 20001, <https://oag.dc.gov/consumer-protection>, Telephone: 202-442-9828.