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November 25, 2020

CONSUMER PROTECTION

VIA FIRST CLASS MAIL

Office of the Attorney General Consumer Protection and Antitrust Bureau 33 Capitol Street Concord, New Hampshire 03301

Re:

Notice of Data Security Incident

Dear Attorney General MacDonald:

This notice is provided on behalf of my client, Cambridge School of Weston (the "Cambridge School"), pursuant to N.H. Rev. Stat. §359-C:20(I)(b), following a vendor data breach that involved the personal information of seven (7) New Hampshire residents. The personal information included the individuals' name, address, phone number, email, date of birth, and Social Security number. The Cambridge School will provide written notice to the affected individuals later today via U.S. mail. The notice includes instructions on how to activate a complimentary, two-year subscription for identify theft protection services from CyberScout, as well as general advice on how to protect one's identity and obtain free credit reports and security freezes. A copy of the notice letter is enclosed. Additional information on the incident is below.

The Cambridge School is a private high school located in Weston, Massachusetts, that contracts with a national vendor, Blackbaud, for data management services related to fundraising and engagement efforts. On July 16, 2020, Blackbaud notified the Cambridge School, along with many other schools and nonprofits, of a ransomware attack that may have involved unauthorized acquisition of certain information maintained on behalf of the Cambridge School, between February 7, 2020 and May 20, 2020. Based upon the information provided by Blackbaud at that time, the Cambridge School conducted a thorough investigation and concluded that no legally protected personal information of its students, alumni, donors or constituents was at risk as a result of the incident.

However, on September 29, 2020, Blackbaud notified the Cambridge School that <u>additional</u> files may have been compromised that Blackbaud did not originally identify as being involved in the incident. Upon learning of these new facts, the Cambridge School immediately commenced a thorough investigation to determine what additional information could have been impacted by the incident. As a result of its investigation, on November 9, 2020, the Cambridge School determined

Sandy B. Garfinkel, Esq. November 25, 2020 Page 2



that seven (7) New Hampshire residents' personally identifiable information may have been involved in the Blackbaud incident.

As of the date of this letter, the Cambridge School is not aware of any unauthorized acquisition of, or inappropriate use of, the personal information involved. The Cambridge School is continuing to actively monitor this situation and follow-up with Blackbaud to ensure that Cambridge School data is not at risk. The Cambridge School's internal team is focused on best in class practices that emphasize the protection and security of all data consistent with our policies and procedures. Blackbaud has reported to the Cambridge School that Blackbaud has implemented the following changes designed to protect data: (1) confirming through testing by multiple third parties, including the appropriate platform vendors, that Blackbaud's fix withstands all known attack tactics; and (2) accelerating its efforts to further harden its environment through enhancements to access management, network segmentation, deployment of additional endpoint and network-based platforms.

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

/s/ Sandy B. Garfinkel, Esq.

SBG/ Enclosure



November 25, 2020



Re: Notice of Data Breach

Dear

We are writing regarding a recent incident that occurred at Blackbaud, a national vendor that provides data management services to many schools and nonprofits, including the Cambridge School of Weston, which may affect the security of your personal information. Because we highly value your relationship with the Cambridge School and take the privacy of your information very seriously, we are notifying you as a precautionary measure, to inform you and to explain steps that you can take to help protect your information.

What Happened

On July 16, 2020, Blackbaud notified us, along with many other schools and nonprofits, of a ransomware attack that may have involved unauthorized acquisition of certain information (including data maintained on behalf of the Cambridge School) between February 7, 2020 and May 20, 2020. Based upon the information provided by Blackbaud at that time, Cambridge School conducted a thorough investigation and concluded that no sensitive personal information of our students, alumni, donors or constituents was at risk as a result of the incident.

However, on September 29, 2020, Blackbaud notified us that <u>additional</u> files may have been compromised that Blackbaud did not originally identify as being involved in the incident. Upon learning of these new facts, we immediately commenced a thorough investigation to determine what additional information could have been impacted by the incident.

What Information Was Involved

Once Blackbaud provided access to the compromised files, we evaluated each of the documents to find out what information was involved, who may have been affected, and where those people resided. As a result of our investigation, On November 9, 2020 we concluded that your personal information may have been involved in the Blackbaud incident. The personal information may have included your name, date of birth, address, telephone number, email address and Social Security number.

What We Are Doing

The confidentiality, privacy, and security of your information is of the utmost importance to us. We have security measures in place to protect the security of information entrusted to us and that we share with vendors. In addition to notifying you, as part of our ongoing commitment to the security of personal information, we continue to actively monitor this situation and follow-up with the vendor to ensure that Cambridge School data is not at additional risk. Our internal team is focused on best-in-class practices

that emphasize the protection and security of all data, consistent with our policies and procedures. We are also providing notice of this incident to appropriate government agencies, consistent with our compliance obligations and responsibilities.

As part of its ongoing efforts to help prevent something like this from happening in the future, Blackbaud reported that it has already implemented the following changes designed to protect your data: (1) confirming through testing by multiple third parties, including the appropriate platform vendors, that Blackbaud's fix withstands all known attack tactics; and (2) accelerating their efforts to further harden their environment through enhancements to access management, network segmentation, and deployment of additional endpoint and network-based platforms.

What You Can Do

At this time, we are not aware of any misuse of information arising from this incident. However, out of an abundance of caution, we are notifying you so you can take additional actions to help protect your information. We strongly encourage you to take the following preventative measures to help detect and mitigate any misuse of your information:

- 1. Activate your complimentary, two-year credit monitoring and identity theft membership from CyberScout. This product provides you with identity monitoring services, including fraud detection and identity theft restoration. For more information on identity theft prevention and CyberScout credit monitoring, including instructions on how to activate your membership, please see the additional information provided at the end of this letter.
- 2. Remain vigilant for incidents of fraud and identity theft by regularly reviewing your account statements and monitoring free credit reports for any unauthorized activity. Information on additional ways to protect your information, including how to obtain a free credit report and free security freeze, can be found at the end of this letter.
- 3. Report any incidents of suspected identity theft to your local law enforcement and state Attorney General. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

For More Information

We understand that you may have questions about this incident that are not addressed in this letter. We are available to speak with you to assist you with questions regarding this incident and steps you can take to protect yourself. Again, we apologize for any inconvenience this incident may cause. We deeply value your relationship with the Cambridge School of Weston. Should you have further questions, please reach out to data@csw.org.

Sincerely,

Kathleen V. Chery

The Cambridge School of Weston

MORE INFORMATION ABOUT IDENTITY THEFT AND WAYS TO PROTECT YOURSELF

Visit www.experian.com/credit-advice/topic-fraud-and-identity-theft.html for general information regarding identity protection. You can obtain additional information about fraud alerts, security freezes, and preventing identity theft from the consumer reporting agencies listed below and the Federal Trade Commission (FTC) by calling its identity theft hotline: 877-438-4338; TTY: 1-866-653-4261. They also provide information online at www.consumer.ftc.gov/features/feature-0014-identity-theft. The FTC's address is: Federal Trade Commission, Division of Privacy and Identity Protection, 600 Pennsylvania Avenue, NW, Washington, DC 20580. You have the ability to place a security freeze on your credit reports by contacting the following agencies.

National Credit Reporting Agencies Contact Information

Equifax	Experian	TransUnion
P.O. Box 105788	P.O. Box 9554	P.O. Box 160
Atlanta, GA 30348	Allen, TX 75013	Woodlyn, PA 19094
1-888-298-0045	1-888-397-3742	1-888-909-8872
www.equifax.com	www.experian.com	www.transunion.com

You also may request a security freeze be added to your credit report at Experian's online Freeze Center, www.experian.com/freeze/center.html, by phone at 1-888-EXPERIAN (1-888-397-3742), or by mail to Experian Security Freeze, P.O. Box 9554, Allen, TX 75013. More information on a security freeze can be found below.

Obtain Your Credit Report

You should also monitor your credit reports. You may periodically obtain your credit reports from each of the national consumer reporting agencies. In addition, under federal law, you are entitled to one free copy of your credit report every 12 months from each of the three nationwide consumer reporting agencies listed above. You may obtain a free copy of your credit report by going to www.AnnualCreditReport.com or by calling (877) 322-8228. You also may complete the Annual Credit Report Request Form available from the FTC at www.consumer.ftc.gov/articles/pdf-0093-annual-report-request-form.pdf and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. You may also contact any of the three major consumer reporting agencies to request a copy of your credit report.

For Colorado residents: You may obtain one or more additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly.

If you discover inaccurate information or a fraudulent transaction on your credit report, you have the right to request that the consumer reporting agency delete that information from your credit report file. Even if you do not find any suspicious activity on your initial credit reports, the FTC recommends that you check your credit reports periodically, which can help spot and address problems 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 at the information provided above.

Fraud Alerts

You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit

report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at www.annualcreditreport.com.

Security Freeze

You have the ability to place a security freeze on your credit report at no cost to you. A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent. To place a security freeze on your credit report, you may be able to use an online process, an automated telephone line, or a written request to any of the three credit reporting agencies listed above. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; (5) a legible copy of a government-issued identification card, (6) proof of current address, such as a legible copy of a recent utility bill or bank or insurance statement, (7) a legible copy of a recent W-2, pay stub, or Social Security card, and (8) if you are a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. Under federal law, you cannot be charged to place, lift, or remove a security freeze.

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.

Additional Helpful Information

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 at the information provided above.

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.

RHODE ISLAND residents: You have the right to file and obtain a copy of a police report concerning any fraud or identity theft committed using your personal information. You may also obtain information about preventing and avoiding identity theft from the Rhode Island Attorney General's Office. This office can be reached at:

Office of the Attorney General 150 South Main Street Providence, RI 02903 www.riag.ri.gov Toll-free: 1-401-274-4400

INFORMATION AND INSTRUCTIONS FOR ENROLLING IN CYBERSCOUT 24 MONTH CREDIT MONITORING SERVICES

We are providing you with access to **Single Bureau Credit Monitoring*** services at no charge. Services are for 24 months from the date of enrollment. When changes occur to your Experian credit file, notification is sent to you the same day the change or update takes place with the bureau. In addition, we are providing you with proactive fraud assistance to help with any questions you might have. In the event you become a victim of fraud you will also have access remediation support from a CyberScout Fraud Investigator. In order for you to receive the monitoring service described above, you must enroll your constituents by March 27, 2021. That means, your constituents need to sign up by March 27, 2021 at the latest in order to receive this service.

Proactive Fraud Assistance. For sensitive breaches focused on customer retention, reputation management, or escalation handling, CyberScout provides unlimited access during the service period to a fraud specialist who will work with enrolled notification recipients on a one-on-one basis, answering any questions or concerns that they may have. Proactive Fraud Assistance includes the following features:

- Fraud specialist-assisted placement of fraud alert, protective registration, or geographical equivalent, in situations where it is warranted.
- After placement of a Fraud Alert, a credit report from each of the three (3) credit bureaus is made available to the notification recipient (United States only).
- Assistance with reading and interpreting credit reports for any possible fraud indicators.
- Removal from credit bureau marketing lists while Fraud Alert is active (United States only).
- · Answering any questions individuals may have about fraud.
- Provide individuals with the ability to receive electronic education and alerts through email. (Note that these emails may not be specific to the recipient's jurisdiction/location.)

Identity Theft and Fraud Resolution Services. Resolution services are provided for enrolled notification recipients who fall victim to an identity theft as a result of the applicable breach incident. ID Theft and Fraud Resolution includes, but is not limited to, the following features:

- Unlimited access during the service period to a personal fraud specialist via a toll-free number.
- Creation of Fraud Victim affidavit or geographical equivalent, where applicable.
- Preparation of all documents needed for credit grantor notification, and fraud information removal purposes.
- All phone calls needed for credit grantor notification, and fraud information removal purposes.
- Notification to any relevant government and private agencies.
- · Assistance with filing a law enforcement report.
- · Comprehensive case file creation for insurance and law enforcement.
- Assistance with enrollment in applicable Identity Theft Passport Programs in states where it is available and in situations where it is warranted (United States only).
- Assistance with placement of credit file freezes in states where it is available and in situations where it is warranted (United States only); this is limited to online-based credit freeze assistance.
- Customer service support for individuals when enrolling in monitoring products, if applicable.
- · Assistance with review of credit reports for possible fraudulent activity.
- Unlimited access to educational fraud information and threat alerts. (Note that these emails may not be specific to the recipient's jurisdiction/location.)

How do I enroll for the free services?

To enroll in Credit Monitoring services at no charge, please navigate to:

If prompted, please provide the following unique code to gain access to services:

Once registered, you can access Monitoring Services by selecting the "Use Now" link to fully authenticate your identity and activate your services. Please ensure you take this step to receive your alerts.

In order for you to receive the monitoring services described above, your constituents need to sign up by March 27, 2021 at the latest in order to receive this service.