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RECEIVED

DEC 27 2022

CONSUMER PROTECTION

VIA U.S. MAIL

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

Re: Cincinnati State Technical Community College – Incident Notification

December 22, 2022

Dear Mr. Formella:

McDonald Hopkins PLC represents Cincinnati State Technical Community College (CSTCC) (located at 3520 Central Parkway, Cincinnati, Ohio 45223). I am writing to provide notification of an incident at CSTCC that may affect the security of personal information of approximately sixty (60) New Hampshire residents. CSTCC's investigation into the incident is ongoing and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, CSTCC does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

On November 2, 2022, Cincinnati State Technical Community College detected unauthorized access to our network as a result of a cybersecurity incident that resulted in the potential exposure of data we maintain. Upon learning of this issue, we contained the threat by disabling all unauthorized access to our network and restoring our systems as needed. We immediately launched an investigation in consultation with outside cybersecurity professionals who regularly investigate and analyze these types of situations to analyze the extent of any compromise to our network. We also reported this incident to law enforcement.

After an extensive forensic investigation and manual document review, CSTCC discovered on November 15, 2022, that certain files were removed from portions of the CSTCC network between October 30, 2022, and November 2, 2022, that contained personal information such as names and one or more of the following: Social Security Numbers, driver's license numbers or state identification numbers, financial account information, and health insurance information.

CSTCC has no indication that any of the information has been misused. Nevertheless, CSTCC wanted to inform your office (and the affected residents) of the incident and explain the steps that it is taking to help safeguard the affected residents and protect their information.

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CSTCC is providing the affected residents with written notification of this incident commencing on or about December 23, 2022, in substantially the same form as the letter attached hereto. CSTCC is advising the affected residents about the process for placing fraud alerts and/or security freezes on their credit files and obtaining free credit reports. The affected residents are also being provided with the contact information for the consumer reporting agencies and the Federal Trade Commission. Individuals that may have had their Social Security number impacted are being provided with complimentary credit monitoring services.

At CSTCC, protecting the privacy of personal information is a top priority. CSTCC is committed to maintaining the privacy of personal information in its possession and has taken many precautions to safeguard it. CSTCC continually evaluates and modifies its practices and internal controls to enhance the security and privacy of personal information.

Should you have any questions regarding this notification, please contact me at (410) 917-5189 or spoilock@mcdonaldhopkins.com. Thank you for your cooperation.

Sincerely,

Spencer S. Pollock

Encl.







Important Information Please Review Carefully

Dear :

The privacy and security of the personal information we maintain is of the utmost importance to Cincinnati State Technical Community College. We are writing with important information regarding a recent security incident that may have involved your personal information. We want to provide you with information about the incident, explain the services we are making available to you and let you know that we continue to take significant measures to protect your information.

What Happened?

On November 2, 2022, Cincinnati State Technical Community College detected unauthorized access to our network as a result of a cybersecurity incident that resulted in the potential exposure of data we maintain.

What Has Been Done

Upon learning of this issue, we contained the threat by disabling all unauthorized access to our network and restoring our systems as needed. We immediately, launched an investigation in consultation with outside cybersecurity professionals who regularly investigate and analyze these types of situations to analyze the extent of any compromise to our network. We also reported this incident to law enforcement. As a result of the forensic investigation, we discovered on November 15, 2022 that certain files were removed from our network between October 30, 2022 and November 2, 2022 that contained some of your personal information.

What Information Was Involved.

The data that was removed from our network included your **As of now, we have no evidence indicating any of your information has been used for identity theft or financial fraud.**

What You Can Do.

We have no evidence that the unauthorized party actually has used any information involved for identity theft or financial fraud. Nevertheless, out of an abundance of caution, we want to make you aware of the incident. To protect you from potential misuse of your information, we are offering access to Single Bureau Credit Monitoring services at no charge. These services provide you with alerts for twelve 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 through Identity Force, a TransUnion company

specializing in fraud assistance and remediation services. For information about how to enroll in these services, please see the Other Important Information section of this letter.

This letter also provides other 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 are 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 and internal controls to enhance the security and privacy of your personal information.

If you have any further questions regarding this incident, please call our dedicated and confidential toll-free response line that we have set up to respond to questions at This response line is staffed with professionals familiar with this incident and knowledgeable on what you can do to protect against misuse of your information. The response line is available Monday through Friday, 9:00 am to 9:00 pm ET, excluding holidays.

Sincerely,

Cincinnati State Technical Community College

- OTHER IMPORTANT INFORMATION -

1. Enrolling in Complimentary 12-Month Cyber Monitoring.

To enroll in Credit Monitoring please services at no charge, log on to and follow the instructions provided. When prompted please In order for you to receive the monitoring services provide the following unique code to receive services: described above, you must enroll within 90 days from the date of this letter. The enrollment requires an internet connection

for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

2. Placing a Fraud Alert on Your Credit File.

Whether or not you choose to use the complimentary 12-month 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.

Experian TransUnion LLC Equifax P.O. Box 105069 P.O. Box 9554 Fraud Victim Assistance Department Atlanta, GA 30348 Allen, TX 75013 P.O. Box 2000 https://www.equifax.com/personal/cre https://www.experian.com/fraud/ Chester, PA 19016-2000 center.html dit-report-services/credit-fraud-alerts/ https://www.transunion.com/fraud-aler (800) 525-6285 (888) 397-3742 (800) 680-7289

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 Experian Security Freeze TransUnion Security Freeze P.O. Box 105788 P.O. Box 9554 P.O. Box 160 Atlanta, GA 30348 Allen, TX 75013 Woodlyn, PA 19094 https://www.equifax.com/personal/cre http://experian.com/freeze https://www.transunion.com/credit-freeze dit-report-services/credit-freeze/ (888) 397-3742 (888) 909-8872 (888) 298-0045

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.

Obtaining a Free Credit Report.

Under federal law, you are entitled to one free credit report every 12 months from <u>each</u> 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.

Iowa Residents: You may contact law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity Theft: Office of the Attorney General of Iowa, Consumer Protection Division, Hoover State Office Building, 1305 East Walnut Street, Des Moines, IA 50319, www.iowaattorneygeneral.gov, Telephone: (515) 281-5164

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: 1-888-743-0023.

North Carolina Residents: You may obtain information about preventing identity theft from the North Carolina Attorney General's Office: Office of the Attorney General of North Carolina, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov/, Telephone: 877-566-7226.

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

New Mexico Residents: You have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf or www.ftc.gov.

In Addition, New Mexico Consumers Have the Right to Obtain a Security Freeze or Submit a Declaration of Removal

As noted above, you may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, you will be provided with a personal identification number, password, or similar device to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report to a specific party or parties or for a specific period of time after the freeze is in place. To remove the freeze or to provide authorization for the temporary release of your credit report, you must contact the consumer reporting agency and provide all of the following:

- 1. The unique personal identification number, password, or similar device provided by the consumer reporting
- 2. Proper identification to verify your identity; and
- 3. Information regarding the third party or parties who are to receive the credit report or the period of time for which the credit report may be released to users of the credit report.

A consumer reporting agency that receives a request from a consumer to lift temporarily a freeze on a credit report shall comply with the request no later than three business days after receiving the request. As of September 1, 2008, a consumer reporting agency shall comply with the request within fifteen minutes of receiving the request by a secure electronic method or by telephone.

A security freeze does not apply in all circumstances, such as where you have an existing account relationship and a copy of your credit report is requested by your existing creditor or its agents for certain types of account review, collection, fraud control, or similar activities; for use in setting or adjusting an insurance rate or claim or insurance underwriting; for certain governmental purposes; and for purposes of prescreening as defined in the federal Fair Credit Reporting Act.

If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze, either completely if you are shopping around or specifically for a certain creditor, with enough advance notice before you apply for new credit for the lifting to take effect. You should contact a consumer reporting agency and request it to lift the freeze at least three business days before applying. As of September 1, 2008, if you contact a consumer reporting agency by a secure electronic method or by telephone, the consumer reporting agency should lift the freeze within fifteen minutes. You have a right to bring a civil action against a consumer reporting agency that violates your rights under the Fair Credit Reporting and Identity Security Act.

To place a security freeze on your credit report, you must send a request to each of the three major consumer reporting agencies: Equifax, Experian, and TransUnion. You may contact these agencies using the contact information provided above.

Rhode Island Residents: You may contact law enforcement, such as the Rhode Island Attorney General's Office, to report incidents of identity theft or to learn about steps you can take to protect yourself from identity theft. You can contact the Rhode Island Attorney General at: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, www.riag.ri.gov, (401) 274-4400.

As noted above, you may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You have a right to place a "security freeze" on your credit report pursuant to chapter 48 of title 6 of the Identity Theft Prevention Act of 2006.

The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, within five (5) business days you will be provided a personal identification number or password to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report for a specific period of time after the freeze is in place. To provide that authorization, you must contact the consumer reporting agency and provide all of the following:

- 1. The unique personal identification number or password provided by the consumer reporting agency.
- 2. Proper identification to verify your identity.
- 3. The proper information regarding the period of time for which the report shall be available to users of the credit report.

A consumer reporting agency that receives a request from a consumer to temporarily lift a freeze on a credit report shall comply with the request no later than three (3) business days after receiving the request.

A security freeze does not apply to circumstances where you have an existing account relationship and a copy of your report is requested by your existing creditor or its agents or affiliates for certain types of an account review, collection, fraud control, or similar activities.

If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze -- either completely, if you are shopping around, or specifically for a certain creditor -- with enough advance notice before you apply for new credit for the lifting to take effect.

You have a right to bring a civil action against someone who violates your rights under the credit reporting laws. The action can be brought against a consumer reporting agency or a user of your credit report.

To place a security freeze on your credit report, you must send a request to each of the three major consumer reporting agencies: Equifax, Experian, and TransUnion. These agencies can be contacted using the contact information provided above.

In order to request a security freeze, you may need to provide the following information:

- 1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
- Social Security number;
- 3. Date of birth;
- 4. Complete address;
- 5. Prior addresses;
- 6. Proof(s) of identification (state driver's license or ID card, military identification, birth certificate, etc.);
- 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.

There were 35 Rhode Island residents impacted by this incident.