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May 18, 2022

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## VIA E-MAIL (ATTORNEYGENERAL@DOJ.NH.GOV)

The Honorable John Formella Attorney General of the State of New Hampshire Office of the Attorney General 33 Capitol Street Concord, New Hampshire 03301

Re: Notification of a Data Security Incident

Dear Attorney General Formella:

We represent First Financial Credit Union ("FFCU"), 4910 Union Way NE, Albuquerque, New Mexico, 87107, in connection with a recent incident that may have involved the personal information of twenty-four (24) New Hampshire residents and provide this notice on behalf of FFCU pursuant to N.H. REV. STAT. ANN. § 359-C:20. This notice will be supplemented, if necessary, with significant facts subsequently discovered. While FFCU is notifying you of this incident, FFCU does not waive any rights or defenses relating to the incident, this notice, or the applicability of New Hampshire law on personal jurisdiction.

### NATURE OF THE SECURITY BREACH OR UNAUTHORIZED USE OR ACCESS

FFCU discovered that an unauthorized third party gained access to FFCU's computer environment. Upon discovering the incident, FFCU promptly took steps to contain the unauthorized access. FFCU also engaged a leading forensic firm to investigate the incident, assist with remediation efforts, and confirm the overall security of FFCU's computer systems.

The investigation determined that between January 17, 2022 and February 7, 2022, an unauthorized third party accessed some files on FFCU's servers. FFCU reviewed the files and, on March 9, 2022, determined that they contained certain individuals' personal information. The information varies depending on the individual, but may include an individual's name, address, Social Security number, driver's license number or government ID number, financial account information, and credit and/or debit card information.



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### NUMBER OF NEW HAMPSHIRE RESIDENTS AFFECTED

FFCU has determined that the incident may have involved twenty-four (24) New Hampshire residents. FFCU provided notification to involved individuals on April 6, 2022. Notice was provided via email, website posting, and press release to major media outlets in FFCU's region. Enclosed is a sample of the email and website notice.

## STEPS TAKEN RELATING TO THE INCIDENT

Upon learning of the incident, FFCU promptly disconnected and secured the affected servers to prevent further unauthorized access. FFCU thereafter retained a leading forensic security firm to investigate and confirm the overall security of its computer systems. FFCU is undertaking efforts to reduce the risk of a similar incident occurring in the future, including enhancing its technical security measures. Finally, as discussed above, FFCU notified the potentially involved individuals and offered complimentary credit monitoring services. The notice also included information on steps individuals can take to protect themselves against fraudulent activity and identity theft.

## **CONTACT INFORMATION**

Please do not hesitate to contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,

Pasha Sternberg

Enclosure



# **NOTICE OF DATA SECURITY INCIDENT**

Dear Valued First Financial Member,

First Financial Credit Union (FFCU) values and respects the privacy of your information, which is why we are writing to notify you of a recent incident that may have involved some of your personal information. We have no reason to believe that your personal information has been misused for the purpose of committing fraud or identity theft, and there is no evidence to date that any member accounts were accessed. We have no indication that the money you've entrusted to FFCU is at risk as a result of this incident. We are providing this notice with guidance on what you can do to protect yourself, should you feel it is appropriate to do so.

What Happened. We recently discovered that an unauthorized third party may have gained access to certain FFCU computer files. There is no evidence that this third party gained access to online passwords and logins or to FFCU's core financial system. Upon learning of the incident, we promptly secured the affected servers to prevent further unauthorized access and began an internal investigation. We also hired a leading forensic security firm to further investigate the incident and confirm the security of our computer servers and network. We also notified law enforcement and are cooperating with their investigation. This investigation determined that the unauthorized third party accessed some files on FFCU's servers between January 17, 2022 through February 6, 2022.

What Information Was Involved. The unauthorized third party accessed files on our network that contained some personal information about our members. This incident may not have included all past and present members, but we are notifying all such members in an effort to alert them that some of their personal information may have been involved. The involved information varies based on the individual, but may include an individual's name, address, Social Security number, driver's license or government ID number, financial account information, and credit and/or debit card information.

What We Are Doing. Out of an abundance of caution we are notifying all past and present members of the situation to ensure that they can take steps to protect themselves if they feel it is appropriate. Although we are not aware of any instances of fraud or identity theft, we are offering a complimentary one-year membership of Experian IdentityWorksSM Credit 3B to individuals who are current or former members. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. If you wish to enroll in these services, please first contact the phone number included in this letter and an FFCU Member Service Representative will provide you with FFCU's Engagement Number and your unique Activation Code. You will need to obtain the number and code before you can enroll or contact Experian. In addition to the actions described above, we have taken steps to help reduce the risk of this type of incident occurring in the future, including but not limited to reviewing FFCU's technical controls to improve our security posture.

What You Can Do. You can find more information by clicking the Additional Important Information button found at the bottom of this email which will provide steps you can take to protect yourself against identity theft or fraud, including the tips provided on fraud alerts, security and credit freezes. We also encourage you to take advantage of the complimentary credit monitoring and identity theft membership that we are offering. Even though it is likely that not everyone receiving this notice had their Social Security number or other personal information involved, we are nevertheless offering credit monitoring to everyone receiving this notice letter, including you.

Other Important Information. Please note, FFCU will never ask for your personal information through an unsolicited email, phone call or text. We value the trust you place in us and take our responsibility to safeguard your personal information seriously. We apologize for any inconvenience or concern this incident might cause. For further information, assistance, or to receive FFCU's Engagement Number and your unique Activation Code to enroll in Experian IdentityWorksSM Credit 3B, please call our Member Resource Center at (800) 342-8298 or (505) 766-5600, Monday through Friday from 7:30am to 6:00pm MST or on Saturdays from 9:00am to 3:00pm MST. For more information on activating your membership please view the activation instructions below.

## **Experian IdentityWorksSM Credit 3B Activation Instructions.**

### **ACTIVATE COMPLIMENTARY CREDIT MONITORING**

To help protect your identity, First Financial Credit Union (FFCU) is offering a complimentary one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

### Activate IdentityWorks Credit 3B in Three Easy Steps:

### 1. CALL FOR ACTIVATION CODE AND ENGAGEMENT NUMBER:

Please call our Member Resource Center for your unique Activation Code and FFCU's Engagement Number at (800) 342-8298 or (505) 766-5600, Monday through Friday from 7:30am to 6:00pm MST or on Saturdays from 9:00am to 3:00pm MST. Your unique Activation Code is time sensitive and will only be active for the next 60 days. You will need to obtain your unique Activation Code and FFCU's Engagement Number BEFORE you can visit Experian's website or contact them for more information.

- 2. **VISIT EXPERIAN IDENTITYWORKS WEBSITE:** After you have called FFCU and you have received your unique Activation Code and FFCU's Engagement Number, you can then visit the Experian IdentityWorks website <a href="https://www.experianidworks.com/3bcredit">here</a> (<a href="https://www.experianidworks.com/3bcredit">https://www.experianidworks.com/3bcredit</a>) to enroll online.
- 3. **CREATE ACCOUNT:** Click on the "Get Started" button and enter your unique Activation Code that was provided to you by FFCU to initiate your membership and create your account.

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-288-8057. **Before you call Experian** directly for assistance, you will need to provide them with FFCU's Engagement Number and your unique Activation Code as proof of eligibility for the identity restoration services provided by Experian. The code and number can both be obtained from FFCU by calling (800) 342-8298 or (505) 766-5600, Monday through Friday from 7:30am to 6:00pm MST or on Saturdays from 9:00am to 3:00pm MST.

### ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.\*
- Credit Monitoring: Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance\*\***: Provides coverage for certain costs and unauthorized electronic fund transfers.

<u>Activate your membership today by clicking here (https://www.experianidworks.com/3bcredit)</u> or call 877-288-8057 to register once you've received your unique Activation Code and Engagement Number from FFCU.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to <a href="www.ExperianIDWorks.com/restoration">www.ExperianIDWorks.com/restoration</a> (/preview/www.ExperianIDWorks.com/restoration) for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8057.

- \* Offline members will be eligible to call for additional reports quarterly after enrolling.
- \*\* Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

We look forward to continuing to serve you and our community.

Sincerely,

Ron Moorehead
President/CEO
First Financial Credit Union

Additional Important Information. (https://mcusercontent.com/99651161cb160a1a5bbb933cf/files/52bfde37-28dd-69ef-71b1-5181b49f8087/ADDITIONAL IMPORTANT INFORMATION 1 .02.pdf)







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