



MULLEN  
COUGHLIN<sup>LLC</sup>  
ATTORNEYS AT LAW

3001 N. Rocky Point Drive East, Suite 200  
Tampa, FL 33607

February 29, 2024

**VIA E-MAIL**

Office of the New Hampshire Attorney General  
Consumer Protection & Antitrust Bureau  
33 Capitol Street  
Concord, NH 03301  
E-mail: DOJ-CPB@doj.nh.gov

**Re: Notice of Data Event**

To Whom It May Concern:

We represent Greensboro College located at 815 W. Market St., Greensboro, NC 27401 and are writing to notify your office of an incident that may affect the security of personal information relating to fifty-seven (57) New Hampshire residents. By providing this notice, Greensboro College does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

**Nature of the Data Event**

On August 17, 2023, Greensboro College discovered suspicious activity related to some of its computer systems. Upon becoming aware of this activity, Greensboro College promptly responded, including taking steps to protect data in their custody, notified law enforcement, and launched a comprehensive investigation to determine the full nature and scope of the event. The investigation determined that certain computer systems were subject to unauthorized access between August 10, 2023, and August 21, 2023. Greensboro College initiated a review of the impacted computer systems to determine the types of information and to whom it related, and just recently completed that effort.

The information that could have been subject to unauthorized access includes

### **Notice to New Hampshire Residents**

On or about February 29, 2024, Greensboro College provided written notice of this incident to fifty-seven (57) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

### **Other Steps Taken and To Be Taken**

Upon discovering the event, Greensboro College investigated and responded to the event, assessed the security of Greensboro College systems, and identified potentially affected individuals. Further, Greensboro College notified federal law enforcement regarding the event. Greensboro College is also working to implement additional safeguards and training to its employees. Greensboro College is providing access to credit monitoring services for , through Epiq, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Greensboro College is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Greensboro College is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Greensboro College is providing written notice of this incident to relevant state and federal regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at .

Very truly yours,

\_\_\_\_\_  
Kevin M. Mekler of  
MULLEN COUGHLIN LLC

KMK/ajl  
Enclosure

# **EXHIBIT A**



Secure Processing Center  
P.O. Box 3826  
Suwanee, GA 30024

<<MailID>>  
<<Name 1>>  
<<Name 2>>  
<<Address 1>>  
<<Address 2>>  
<<Address 3>>  
<<Address 4>>  
<<City>>, <<State>><<Zip>>  
<<Country>>

<<Date>>

## NOTICE OF <<Variable Data 1>>

Dear <<Name 1>>:

Greensboro College is writing to notify you of a recent event that may affect the privacy of certain information related to you. This notice provides information about the event, our response, and resources available that we are offering at no cost to you to help protect your information from possible misuse, should you feel it appropriate to do so.

**What Happened?** Greensboro College detected potentially malicious activity related to some of its computer systems. Upon becoming aware of this activity, we responded promptly, including taking steps to protect data in our custody, notified law enforcement, and launched a comprehensive investigation to determine the full nature and scope of the activity. The investigation determined that certain computer systems were subject to unauthorized access between August 10, 2023 and August 21, 2023. Greensboro College initiated a review of the impacted computer systems to determine the types of information, to whom it related, and identify contact information which was completed on February 5, 2024. We are notifying you because we identified that certain information related to you may have been impacted.

**What Information Was Involved?** The information related to you contained in the affected files and therefore potentially impacted as a result of this event included your name, <<Breached elements>>.

**What We Are Doing.** Greensboro College treats its responsibility to safeguard the information in our possession as an utmost priority. Upon learning of this event, we investigated and responded to the event, assessed the security of relevant systems, and we are now notifying potentially affected individuals. Further, as part of our ongoing commitment to the privacy and security of personal information in our care, we are instituting additional technical safeguards and policies and procedures. Our response to this event also included prompt reporting to law enforcement and notification to relevant state and federal regulators.

As an added precaution we are offering you access to \_\_\_\_\_ of credit monitoring and identity theft protection services through Epiq at no cost to you. If you wish to activate these services, you may follow the instructions included in the attached *Steps You Can Take to Help Protect Personal Information*. We encourage you to enroll in these services as we are unable to act on your behalf to do so.

**What You Can Do.** We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account and monitoring your free credit reports for suspicious activity and to detect errors. Further, please review the enclosed “*Steps You Can Take to Help Protect Personal Information*” section of the letter for additional information. You can also enroll to receive the complimentary credit monitoring services that we are offering to you.

**For More Information.** If you have additional questions, please call the dedicated assistance line at 888-321-0308 (toll free), Monday through Friday, from 9:00 a.m. to 9:00 p.m. EST, excluding major U.S. holidays. Individuals may also write to Greensboro College at 815 W. Market St., Greensboro, NC 27401.

Sincerely,

Greensboro College

## STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

### Enroll in Monitoring Services



Enter your Activation Code: <<ACTIVATION CODE>>  
Enrollment Deadline: <<DEADLINE MMMM DD, YYYY>>

### Equifax Credit Watch™ Gold

\*Note: You must be over age 18 with a credit file to take advantage of the product

### Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications<sup>1</sup> when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts<sup>2</sup>, which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock<sup>3</sup>
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft<sup>4</sup>

### Enrollment Instructions

Go to [www.equifax.com/activate](http://www.equifax.com/activate)

Enter your unique Activation Code of <<ACTIVATION CODE>> then click “Submit” and follow these 4 steps:

1. **Register:**

Complete the form with your contact information and click “Continue”.

*If you already have a myEquifax account, click the ‘Sign in here’ link under the “Let’s get started” header.*

*Once you have successfully signed in, you will skip to the Checkout Page in Step 4*

2. **Create Account:**

Enter your email address, create a password, and accept the terms of use.

3. **Verify Identity:**

To enroll in your product, we will ask you to complete our identity verification process.

4. **Checkout:**

Upon successful verification of your identity, you will see the Checkout Page.

Click ‘Sign Me Up’ to finish enrolling.

**You’re done!**

The confirmation page shows your completed enrollment.

Click “View My Product” to access the product features.

<sup>1</sup>WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded. <sup>2</sup>The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC. <sup>3</sup>Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit [www.optoutprescreen.com](http://www.optoutprescreen.com) <sup>4</sup>The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

## **Monitor Your Accounts**

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order a free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/help/">https://www.experian.com/help/</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
1-888-298-0045	1-888-397-3742	1-800-916-8800
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

## **Additional Information**

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580; [www.identitytheft.gov](http://www.identitytheft.gov); 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state Attorney General. This notice has not been delayed by law enforcement.

*For District of Columbia residents*, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; (202) 442-9828; and [oag.dc.gov](http://oag.dc.gov).

*For Maryland residents*, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

*For New Mexico residents*, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active-duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage consumers to review their rights pursuant to the Fair Credit Reporting Act by visiting [www.consumerfinance.gov/f/201504\\_cfbp\\_summary\\_your-rights-under-fcra.pdf](http://www.consumerfinance.gov/f/201504_cfbp_summary_your-rights-under-fcra.pdf), or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

*For New York residents*, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov>.

*For North Carolina residents*, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and [www.ncdoj.gov](http://www.ncdoj.gov).

*For Rhode Island residents*, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; [www.riag.ri.gov](http://www.riag.ri.gov); and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. There are approximately 34 Rhode Island residents that may be impacted by this event.