# STATE OF NH DEPT OF JUSTICE 2020 SEP 30 PM 12: 49

# BakerHostetler

September 29, 2020

## Baker&Hostetler LLP

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## VIA OVERNIGHT MAIL

Attorney General Gordon MacDonald Office of the Attorney General 33 Capitol Street Concord, NH 03301

Re:

Incident Notification

Dear Attorney General MacDonald:

We are writing on behalf of our client, Gulf Coast State College ("GCSC"), to notify you of a security incident involving 11 New Hampshire residents.

GCSC has conducted an investigation involving unauthorized access to several email accounts belonging to GCSC's employees. Upon first learning of the potential access on June 3, 2020, GCSC immediately took measures to secure the email account and launched an investigation with the assistance of a professional security firm to determine the nature and scope of the incident. Through the investigation, GCSC determined that an unauthorized party had accessed the email accounts of several employees at various times between March 31, 2020 and June 3, 2020. GCSC performed a comprehensive review of the full mailbox messages, and on August 12, 2020, determined that information stored in the email accounts contained personal information of certain individuals. Eleven of these individuals were subsequently determined to be New Hampshire residents. Their information includes their name and Social Security number.

Beginning today, GCSC is providing written notice to the New Hampshire residents by U.S. Mail.<sup>1</sup> A sample copy of the notification letter is enclosed. GCSC is offering individuals involved in the incident a complimentary one-year membership in credit monitoring and identity theft protection services through Kroll. GCSC has also established a dedicated call center where all individuals may obtain more information regarding the incident.

<sup>&</sup>lt;sup>1</sup> This report does not waive GCSC's objection that New Hampshire lacks personal jurisdiction over it related to any claims that may arise from this incident.

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To further protect personal information, GCSC is taking steps to enhance its existing security protocols and re-educating its staff for awareness of these types of incidents.

Please do not hesitate to contact me if you have any questions regarding this incident.

Sincerely,

David E. Kitchen

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Partner

Enclosure



<< Date>> (Format: Month Day, Year)

<<first\_name>> <<miidle\_name>> <<last\_name>> <<suffix>>
<<address\_1>>
<<address\_2>>
<<city>>, <<state\_province>> <<postal\_code>>
<<country >>

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>,

At Gulf Coast State College, we understand the importance of protecting and securing the personal information that we maintain. I am writing to inform you of an incident that may have involved some of your information. This notice explains the incident, measures we have taken, and some steps you can take in response.

We have conducted an investigation involving unauthorized access to several of our employees' email accounts. Upon first learning of the unauthorized access, we immediately took steps to secure the employees' email accounts and began an investigation. The investigation determined that an unauthorized person had access to the contents of the employees' accounts at various times between March 31, 2020 and June 3, 2020.

The investigation did not determine whether the unauthorized individual viewed or acquired any contents in the accounts; however, we are not able to rule out that possibility. We searched the contents of the accounts to identify documents containing personal information that may have been viewed or acquired and on August 12, 2020 we determined that an email or attachment contained your personal information, including your <<br/>b2b\_text\_1(ImpactedData)>>.

Although we have no indication your information was viewed or acquired, and we have no indication that your information has been misused, we encourage you to remain vigilant by reviewing your account statements and credit reports for any unauthorized activity. As an added precaution, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration. For more information on identity theft prevention and Kroll Identity Monitoring, including instructions on how to activate your complimentary one-year membership, please visit the below website:

Visit https://enroll.idheadquarters.com to activate and take advantage of your identity monitoring services.

You have until December 27, 2020 to activate your identity monitoring services.

Membership Number: << Member ID>>>

Your confidence and trust are important to us, and we regret any inconvenience or concern this incident may cause. To help prevent something like this from happening in the future, we are taking steps to enhance our existing security protocols and re-educating our staff for awareness on these types of incidents. If you have any questions, please call 1-866-394-1553, Monday through Friday from 8:00 A.M. through 5:30 P.M. Central Time.

Sincerely,

Dr. John Holdnak President

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#### ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

Experian, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742

TransUnion, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

If your health insurance or medical information was involved, it is also advisable to review the billing statements you receive from your health insurer or healthcare provider. If you see charges for services you did not receive, please contact the insurer or provider immediately.

If your username and password to an online account was involved, it is also advisable to change your password to the account as well as any other accounts that use the same or a similar password.

## Fraud Alerts and Credit or Security Freezes:

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for prescreened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- Experian Security Freeze, PO Box 9554, Allen, TX 75013, www.experian.com
- TransUnion Security Freeze, PO Box 2000, Chester, PA 19016, www.transunion.com
- · Equifax Security Freeze, PO Box 105788, Atlanta, GA 30348, www.equifax.com

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 bureau will provide you with 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.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

### Additional information for residents of the following states:

**New York**: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-6971220, http://www.dos.ny.gov/consumerprotection; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, https://ag.ny.gov

North Carolina: You may contact and obtain information from your state attorney general at: North Carolina Attorney General's Office, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov

Summary of Your Rights Under the Fair Credit Reporting Act: The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

- · You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- · You have the right to ask for a credit score.
- · You have the right to dispute incomplete or inaccurate information.
- Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information.
- Consumer reporting agencies may not report outdated negative information.
- · Access to your file is limited.
- You must give your consent for reports to be provided to employers.
- · You may limit "prescreened" offers of credit and insurance you get based on information in your credit report.
- You have a right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency
  from releasing information in your credit report without your express authorization.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.



### TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

## **Triple Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data at any of the three national credit bureaus—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you will have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

#### Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

## **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.