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February 11, 2015

Attorney General Joseph Foster
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Kaplan University

Dear Attorney General Foster:

We represent Kaplan University ("Kaplan") and are writing in follow-up to our July 9, 2014 notification regarding a privacy incident that affects the security of personal information of one (1) New Hampshire resident. Kaplan's investigation is ongoing and this notification will be supplemented with any new significant facts or findings subsequent to this submission, if any. By providing this notice, Kaplan does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction. As set forth in our prior correspondence, Kaplan was under a law enforcement stay of notice issued by the U.S. Department of Veterans Affairs, Office of Inspector General, Criminal Investigations Division ("VA OIG/CID"). The stay of notice has now been lifted.

On June 4, 2014, the UVA OIG/CID alerted Kaplan that it was the victim of theft involving a former Kaplan University employee and the personal information of some of its students. Kaplan immediately began to investigate after learning about this incident, and has devoted considerable time and effort to determine what information the hardcopy documents contained. We can confirm that those documents contained the resident's full name and Social Security number.

We wanted to make you (and the affected resident) aware of the incident and explain the steps Kaplan is taking to safeguard the resident against identity fraud. Kaplan provided the New Hampshire resident with written notice of this incident commencing on February 11, 2015, in substantially the same form as the letter attached hereto. Kaplan has advised the resident to remain vigilant in reviewing financial account statements for fraudulent or irregular activity. Kaplan is also offering the resident a complimentary one-year membership with a credit monitoring service and is also providing dedicated call center support, to answer questions.

Kaplan has advised the resident about the process for placing a fraud alert on their credit files, placing a security freeze, and obtaining a free credit report. The resident has also been provided with the contact information for the consumer reporting agencies and the Federal Trade Commission.

Kaplan understands the critical importance of protecting personal information. Kaplan will continue to work to ensure that its students' personal information is secure.

Should you have any questions regarding this notification, please contact me

Sincerely,



JJG/dap
Encl.



IMPORTANT INFORMATION

PLEASE READ CAREFULLY

Date

FirstName LastName

Address1

Address2

City, State ZIP

Dear FirstName LastName,

Kaplan University is committed to its students' privacy and data security. We are writing to let you know about an information security situation that may affect you, and the steps we have taken to address it. On June 4, 2014, the U.S. Department of Veterans Affairs alerted Kaplan University that it was the victim of theft involving a former Kaplan University employee and the personal information of some of its students.

We take this situation very seriously, and are taking all appropriate steps to notify you so that you may take action along with our efforts to minimize any misuse of your information. While we wanted to notify you earlier, due to the investigation pending against the former employee, law enforcement officials instructed us not to notify affected students until now.

We immediately began to investigate after learning about this incident, and have devoted considerable time and effort to determine what information those hardcopy documents contained. We can confirm that those documents contained your [customized per student].

We sincerely regret this situation, and want to assist you in taking precautionary measures to minimize misuse of your information. Enclosed you will find information on enrolling in a complimentary 12-month membership of Experian's ProtectMyID[®] Alert, along with other tips to protect your personal information, including placing a Fraud Alert and obtaining a free credit report. You should always regularly review your banking statements for fraudulent or irregular activity. In addition, you should consider calling your bank or credit card company to determine whether you should change your bank account and/or credit card number.

We understand the critical importance of protecting personal information and we sincerely apologize that this incident occurred. We will continue to work to ensure that our students' personal information is secure.

If you have any further questions regarding this incident, please call our toll-free number we have set up to respond to questions at (800) 747-2755. The call center is available Monday through Friday, 9:00 a.m. to 9:00 p.m. Eastern Time.

Sincerely,

Kaplan University

- ADDITIONAL INFORMATION -

1. **Enrolling in Complimentary 12-Month Credit Monitoring.**

Protecting your personal information is important to Kaplan University. In response to this security incident and as a precautionary measure, we have arranged for you to enroll in Experian's® ProtectMyID® Alert for a one year period at no cost to you. This protection is provided by Experian, one of the three major nationwide credit reporting companies.

Activate ProtectMyID Now in Three Easy Steps

1. ENSURE that you enroll by **May 31, 2015**.
2. VISIT the ProtectMyID Web Site to enroll: **www.protectmyid.com/enroll**
3. PROVIDE your 9-character Activation Code: **<XXXXXXXXXX>**

If you have questions or need an alternative to enrolling online, please call (877) 441-6943 and provide Engagement # **PC91864**.

Additional Details Regarding Your 12-Month ProtectMyID Membership:

A credit card is not required for enrollment.

Once your ProtectMyID membership is activated, you will receive the following features:

- **Free copy of your Experian credit report**
- **Surveillance Alerts for:**
 - **Daily Bureau Credit Monitoring:** Alerts of key changes & suspicious activity found on your Experian, Equifax® and TransUnion® credit reports.
- **Identity Theft Resolution & ProtectMyID ExtendCARE:** Toll-free access to US-based customer care and a dedicated Identify Theft Resolution agent who will walk you through the process of fraud resolution from start to finish for seamless service. They will investigate each incident; help with contacting credit grantors to dispute charges and close accounts including credit, debit and medical insurance cards; assist with freezing credit files; contact government agencies.
 - It is recognized that identity theft can happen months and even years after a data breach. To offer added protection, you will receive ExtendCARE™, which provides you with the same high-level of Fraud Resolution support even after your ProtectMyID membership has expired.
- **\$1 Million Identity Theft Insurance:** Immediately covers certain costs including, lost wages, private investigator fees, and unauthorized electronic fund transfers. (Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of 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.)

Once your enrollment in ProtectMyID is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID, 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) 441-6943.

2. Placing a Fraud Alert.

Whether or not you choose to use the complimentary 12 month credit monitoring services, we recommend that you place an initial 90-day "Fraud Alert" on your credit files. 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.

TransUnion

Consumer Fraud Division
PO Box 6790
Fullerton, CA 92834-6790
www.transunion.com/fraud
1-800-680-7289

Experian

Consumer Fraud Division
PO Box 9554
Allen, TX 75013
www.experian.com
1-888-397-3742

Equifax

Consumer Fraud Division
PO Box 740256
Atlanta, GA 30374-0256
www.equifax.com
1-800-525-6285

3. Placing a Security Freeze on Your Credit File.

In addition, you may request a "Security Freeze" be placed on your credit file. 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 sending a request in writing, by mail, to all three nationwide credit reporting companies.

4. Obtaining a Free Credit Report.

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit report online at **www.annualcreditreport.com**.

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.