



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

RECEIVED  
DEC 09 2021  
CONSUMER PROTECTION

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426 W. Lancaster Avenue, Suite 200  
Devon, PA 19333

December 3, 2021

**VIA U.S. MAIL**

Consumer Protection Bureau  
Office of the New Hampshire Attorney General  
33 Capitol Street  
Concord, NH 03301

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent American Council for International Studies ("ACIS") located at 330 Congress Street, 5<sup>th</sup> Floor, Boston, MA 02210, and are writing to notify your office of an event that may affect the security of certain personal information relating to approximately one hundred eighty (180) New Hampshire residents. This notice may be supplemented if new significant facts are learned subsequent to its submission. By providing this notice, ACIS 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 June 10, 2021, ACIS discovered that its network had been impacted by a malware attack that encrypted certain systems. ACIS immediately launched an investigation, with the assistance of third-party computer forensic specialists, to determine the nature and scope of the event. ACIS quickly worked to: (1) secure the systems; (2) restore access to the information so ACIS could continue to operate without disruption; and, (3) investigate what happened and whether the event resulted in any unauthorized access to, or theft of, information by the unknown actor. Through the investigation, ACIS determined that the unknown actor gained access to certain systems between May 25, 2021 and June 10, 2021 and downloaded information from those systems.

ACIS then performed a comprehensive review of information stored on the systems to determine what information was impacted and to whom the information related. Upon completion of the review, ACIS then conducted a manual review of its records to determine the identities and contact information for potentially affected individuals. ACIS recently confirmed address information for affected individuals to provide notifications.

The information that could have been subject to unauthorized access for New Hampshire residents includes name and Social Security number.

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

On August 30, 2021, ACIS provided preliminary notice of this event along with an offer of complimentary credit monitoring services to potentially affected employees while the investigation was ongoing. On December 3, 2021, ACIS continued providing written notice of this event to affected individuals, which includes approximately one hundred eighty (180) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached hereto as *Exhibit A*.

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

Upon discovering the event, ACIS moved quickly to investigate and respond, assess the security of its systems, and notify potentially affected individuals. ACIS is also working to implement additional administrative and technical safeguards and training to its employees. ACIS is providing access to credit monitoring services for one (1) year, through Experian, to individuals whose personal information was potentially affected by this event, at no cost to these individuals.

Additionally, ACIS is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. ACIS is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, 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. ACIS also reported this event to federal law enforcement and notified other appropriate state regulators.

#### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4802.

Very truly yours,



Samuel Sica, III of  
MULLEN COUGHLIN LLC

SZS/dtg  
Enclosure

# EXHIBIT A



Return Mail Processing  
 PO Box 589  
 Claysburg, PA 16625-0589

December 3, 2021

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SAMPLE A SAMPLE - L01 ADULT  
 APT ABC  
 123 ANY STREET  
 ANYTOWN, ST 12345-6789



[Re: Notice of Data Breach]

Dear Sample A. Sample:

American Council for International Studies (“ACIS”) is writing to inform you of a recent event that may impact the security of some of your information. While we have received no indications of actual misuse of information as a result of this event, this notice provides information about the event, our response, and resources available to you to help protect your information from possible misuse, should you feel it appropriate to do so.

**What Happened?** On June 10, 2021, we discovered that our network had been impacted by a malware attack that encrypted certain systems. We immediately launched an investigation to determine the nature and scope of the event. We quickly worked to: (1) secure the systems; (2) restore access to the information so we could continue to operate without disruption and (3) investigate what happened and whether the event resulted in any unauthorized access to, or theft of, information by the unknown actor. Through our investigation, we determined that the unknown actor gained access to certain systems between May 25, 2021 and June 10, 2021 and downloaded information from those systems.

We then performed a comprehensive review of information stored on the systems to determine what information was impacted and to whom the information related. Upon completion of the review, we then conducted a manual review of our records to determine the identities and contact information for potentially affected individuals. We recently confirmed address information for affected individuals to provide notifications.

**What Information Was Involved.** Our investigation determined that the impacted information may have included your name and [Data Elements].

**What We Are Doing.** The confidentiality, privacy, and security of information in our care are among our highest priorities, and we take this incident very seriously. We are reviewing our security policies and procedures to reduce the risk of similar future events. Although we do not have any indication of identity theft or fraud as a result of this event, we are offering complimentary credit monitoring and identity restoration services through Experian for ## months as an added precaution. We also reported this event to federal law enforcement and notified appropriate state regulators.

**What You Can Do.** We encourage you to remain vigilant against incidents of identity theft and fraud and to review your account statements and free credit reports for suspicious activity and to detect errors. Additional information and resources are included in the enclosed *Steps You Can Take to Help Protect Your Information*. You may also enroll in the complimentary credit monitoring services available to you. Enrollment instructions are enclosed with this letter.

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**For More Information.** If you have additional questions, please call our dedicated assistance line at (877) 759-8886, Monday through Friday from 9 a.m. to 11 p.m. Eastern Time and Saturday - Sunday from 11 a.m. to 8 p.m., Eastern Time. Be prepared to provide your engagement number: B021967. You may also write to ACIS at 330 Congress Street, 5<sup>th</sup> Floor, Boston, MA 02210.

We sincerely regret any inconvenience or concern this event may cause.

Sincerely,

A handwritten signature in black ink that reads "Peter Jones". The signature is written in a cursive style with a large, stylized "P" and "J".

Peter Jones  
President  
American Council for International Studies

## STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

### Enroll in Credit Monitoring

To help protect your identity, we are offering a complimentary ##-month membership of Experian's® IdentityWorks<sup>SM</sup>. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

1. Ensure that you **enroll by: February 28, 2022** (Your code will not work after this date.)
2. **Visit** the Experian IdentityWorks website to enroll: [www.experianidworks.com/credit](http://www.experianidworks.com/credit)
3. Provide your **activation code**:

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) 759-8886 by **February 28, 2022**. Be prepared to provide engagement number \_\_\_\_\_ is proof of eligibility for the identity restoration services by Experian.

### **ADDITIONAL DETAILS REGARDING YOUR ##-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:**

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

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **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 file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE<sup>TM</sup>:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance<sup>\*\*</sup>:** Provides coverage for certain costs and unauthorized electronic fund transfers.

\* Offline members will be eligible to call for additional reports quarterly after enrolling.

\*\* The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (877) 759-8886. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for ## months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration). You will also find self-help tips and information about identity protection at this site.

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## **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 your free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your 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 one-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 you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one 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 your name without your consent. However, you should be aware that using a credit freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. To request a security freeze, you will need to provide 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, military identification, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a fraud alert or credit freeze, 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>
888-298-0045	1-888-397-3742	833-395-6938
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**

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 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. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your 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 St. NW Washington, D.C. 20001; 202-727-3400; 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; 1-410-528-8662 or 1-888-743-0023; and [www.oag.state.md.us](http://www.oag.state.md.us).

*For New Mexico residents*, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your 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 your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You 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 you to review your rights pursuant to the Fair Credit Reporting Act by visiting [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fera.pdf](http://www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fera.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, you have the right to obtain any police report filed in regard to this incident. There are 195 Rhode Island residents impacted by this incident.

RI DEPT OF JUSTICE  
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