

JacksonLewis

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JUL 16 2021

CONSUMER PROTECTION

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Rachel Ehlers
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Re: Data Incident Notification¹

Office of the Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

July 14, 2021

Dear Sir or Madam:

Please be advised that on June 28, 2021, our client, Animal Behavior College (“ABC”), learned that personal information of New Hampshire residents may have been subject to unauthorized access or acquisition as the result of a cyberattack (the “Incident”). Based on the underlying investigation, it appears the Incident occurred on or around March 30, 2021. The data elements involved may have included name, address, birth date, or Social Security numbers.

Immediately upon learning about the Incident, ABC commenced an investigation to determine the scope of the Incident and identify those potentially affected. This included ABC working with its information technology team and third-party forensic experts in an effort to ensure the Incident did not result in any additional exposure to personal information, and to determine what information may have been accessed or acquired. The investigation determined that the unauthorized actor may have gained access to certain ABC files, but as unable to determine what information contained with the files was accessed or acquired as a result of this Incident. Thus, ABC engaged a firm to perform data mining on the impacted files/folders on the drive to determine whether they contained any personal information.

Based on the results of the data mining, it appears that 1,847 individuals could have been affected, including 10 New Hampshire residents. In light of this Incident, ABC plans to begin notifying individuals by mail in the next several days. ABC will also provide one year of free credit monitoring to all affected individuals. A draft copy of the notification that will be sent is enclosed with this letter.

¹ Please note that by providing this letter ABC is not agreeing to the jurisdiction of State of New Hampshire, nor waiving its right to challenge jurisdiction in any subsequent actions.

As set forth in the enclosed letter, ABC has taken numerous steps to protect the security of the personal information of all individuals. In addition to continuing to monitor this situation, ABC is reexamining its current privacy and data security, policies and procedures to find ways of reducing the risk of future data incidents. ABC is also reviewing its technical security policies and procedures and making improvements where it can to minimize the chances of this happening again. Should ABC become aware of any significant developments concerning this situation, we will inform you.

If you require any additional information on this matter, please call me.

Sincerely,

JACKSON LEWIS, P.C.

/s/ Rachel Ehlers

rachel.ehlers@jacksonlewis.com

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Animal Behavior College, Inc.
10300 SW Greenburg Rd. Suite 570
Portland, OR 97223

To Enroll, Please Call:
1-833-903-3648
Or Visit:
[https://app.idx.us/account-
creation/protect](https://app.idx.us/account-creation/protect)
Enrollment Code: <<XXXXXXXXXX>>

<<First Name>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip>>

July 15, 2021

Notice of Data Breach

Dear <<First Name>> <<Last Name>>,

At Animal Behavior College, Inc. (“ABC”), we value and respect the privacy of your information, which is why we are writing to inform you we recently learned that some of your personal information may have been subject to unauthorized access or acquisition as the result of a cyberattack (the “Incident”). While we are not aware of any misuse of your information, we are providing this notice to inform you of the Incident and to call your attention to steps you may take to better protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

What Happened?

On June 28, 2021, ABC discovered your personal information may have been accessible to an unauthorized actor(s) as a result of the Incident. Based on the investigation, it appears the Incident occurred at ABC sometime on or around March 30, 2021.

What Information Was Involved?

The following types of data may have included personal information such as your name and Social Security number. In some cases, there was also the individual’s address, date of birth, or Driver’s License number. No financial account, credit card, or debit card information was involved in this incident.

What We Are Doing.

ABC takes this Incident and the security of your personal information very seriously. Upon learning of this incident, we launched an in-depth investigation to determine the scope of the Incident and identify those potentially affected. This included working with our information technology team and engaging third-party forensic experts in an effort to ensure the Incident did not result in any additional exposure to personal information and taking steps to confirm the integrity of ABC’s systems. We also worked with third-party experts to determine what information may have been at risk. ABC has also reported the Incident to the Federal Bureau of Investigation (“FBI”) to assist in our investigations and best protect from any incidents like this in the future. This communication was not delayed at the request of law enforcement. As an added precaution, we are also offering complimentary access to identity monitoring, fraud consultation, and identity theft restoration services. If you wish to receive these services, activation instructions are below.

What You Can Do.

The attached sheet describes steps you can take to protect your identity and personal information. In addition, we are offering identity theft protection services through IDX. IDX identity protection services include: <<12 months/24 months>> of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

What You Can Do

We encourage you to contact IDX with any questions and to enroll in free identity protection services by calling 1-833-903-3648 or going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 6 am - 6 pm Pacific Time. Please note the deadline to enroll is October 15, 2021.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

For More Information

ABC apologizes for the inconvenience this may cause. We are committed to maintaining the security and privacy of personal information. We want you to be assured that we are taking steps to minimize the chances of a similar occurrence happening again. We understand that you may have questions about this incident that are not addressed in this letter. Please call 1-833-903-3648 or go to <https://app.idx.us/account-creation/protect> for assistance or for any additional questions you may have.

Regards,

Animal Behavior College, Inc.

ADDITIONAL RECOMMENDED STEPS

We recommend you remain vigilant and consider taking the following steps to avoid identity theft, obtain additional information, and protect your personal information:

- **IDX Protection.** Go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you. Contact IDX at 1-833-903-3648 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.
- Order Your Free Credit Report at www.annualcreditreport.com, call toll-free at 877-322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's website at www.ftc.gov. When you receive your credit report, review the entire report carefully. Look for any inaccuracies and/or accounts you don't recognize and notify the credit bureaus as soon as possible in the event there are any. You have rights under the federal Fair Credit Reporting Act ("FCRA"). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information.
- Place a Fraud Alert on Your Credit File. A fraud alert helps protect you against an identity thief opening new credit in your name. With this alert, when a merchant checks your credit history when you apply for credit, the merchant will receive a notice that you may be a victim of identity theft and to take steps to verify your identity. You also have the right to place a "security freeze" on your credit file. A security freeze generally will prevent creditors from accessing your credit file at the three nationwide credit bureaus without your consent. You can place a fraud alert or request a security freeze by contacting the credit bureaus. The credit bureaus may require that you provide proper identification prior to honoring your request.

Equifax	P.O. Box 740241 Atlanta, GA 30374	1-800-525-6285	www.equifax.com
Experian	P.O. Box 9532 Allen, TX 75013	1-888-397-3742	www.experian.com
TransUnion	P.O. Box 2000 Chester, PA 19016	1-800-680-7289	www.transunion.com

- Remove your name from mailing lists of pre-approved offers of credit for approximately six months.
- If you aren't already doing so, please pay close attention to all bills and credit-card charges you receive for items you did not contract for or purchase. Review all of your bank account statements frequently for checks, purchases or deductions not made by you. Note that even if you do not find suspicious activity initially, you should continue to check this information periodically since identity thieves sometimes hold on to stolen personal information before using it.
- The Federal Trade Commission ("FTC") offers consumer assistance and educational materials relating to identity theft, privacy issues, and how to avoid identity theft. You may also obtain information about fraud alerts and security freezes from the consumer reporting agencies, your state Attorney General, and the FTC. If you detect any incident of identity theft or fraud, promptly report the incident to your local law enforcement authorities, your state Attorney General, and/or the Federal Trade Commission ("FTC"). You can learn more about how to protect yourself from becoming an identity theft victim (including how to place a fraud alert or security freeze) by contacting the FTC at 1-877-IDTHEFT (1-877-438-4338), or www.ftc.gov/idtheft. The mailing address for the FTC is: Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW Washington, DC 20580.

- *For District of Columbia Residents:* You can obtain additional information about steps to take to avoid identity theft from the Office of the Attorney General for the District of Columbia, 441 4th Street, NW, Washington, DC 20001, 202-727-3400, www.oag.dc.gov.
- *For Maryland Residents:* You can obtain information about steps you can take to help prevent identity theft from the Maryland Attorney General at: 200 St. Paul Place, Baltimore, MD 21202, 888-743-0023, www.oag.state.md.us.
- *For New Mexico Residents:* Additional information for New Mexico residents wanting to place a security freeze on their credit report can be found at: <http://consumersunion.org/pdf/security/securityNM.pdf>
- *For New York Residents:* You may also contact the following state agencies for information regarding security breach response and identity theft prevention and protection information: 1) New York Attorney General, (212) 416-8433 or <https://ag.ny.gov/internet/resource-center>; or 2) NYS Department of State's Division of Consumer Protection, (800) 697-1220 or <https://dos.ny.gov/consumer-protection>.
- *For North Carolina Residents:* You can obtain information about steps you can take to help prevent identity theft from the North Carolina Attorney General at: 9001 Mail Service Center, Raleigh, NC 27699, 1-877-566-7226, www.ncdoj.gov.
- *For Rhode Island Residents:* You can obtain information from the Rhode Island Attorney General about steps you can take to help prevent identity theft at: 150 South Main Street, Providence, RI 02903, (401) 2744400, www.riag.ri.gov.