

RECEIVED

NOV 29 2021

CONSUMER PROTECTION



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Kevin Dolan
Office: (267) 930-4861
Fax: (267) 930-4771
Email: kdolan@mullen.law

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

November 24, 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 Anna Maria College located at 50 Sunset Lane, Paxton, Massachusetts 01612 and are writing to notify your office of an incident that may affect the security of some personal information relating to three (3) New Hampshire residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Anna Maria 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 or about April 20, 2021, Anna Maria College discovered suspicious activity involving certain employee email accounts and initiated an investigation. As part of the investigation, which was conducted by third-party forensic specialists, it was determined that certain employee email accounts were accessed without authorization between January 25, 2021 to April 20, 2021. The investigation could not confirm what specific information within these accounts may have been accessed by the unauthorized individual. Therefore, in an abundance of caution, Anna Maria College then undertook a diligent and comprehensive review of the entire contents of the impacted email accounts to determine the full universe of information present in these accounts and potentially subject to unauthorized access. On or around October 25, 2021, the full scope of this comprehensive review was completed, and Anna Maria College confirmed whose information was potentially accessed. The information that could have been subject to unauthorized access includes name, address, Social Security number and Driver's License number.

Mullen.law

Notice to New Hampshire Residents

On or about November 24, 2021, Anna Maria College provided written notice of this incident to all affected individuals, which includes three (3) 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

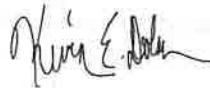
Upon discovering the event, Anna Maria College moved quickly to investigate and respond to the incident, assess the security of Anna Maria College systems, and notify potentially affected individuals. Anna Maria College is also working to implement additional safeguards and training to its employees.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

Additionally, Anna Maria College 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. Anna Maria 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.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4861.

Very truly yours,



Kevin Dolan of
MULLEN COUGHLIN LLC

KED/eks
Enclosure

EXHIBIT A



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

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

<<b2b_text_2(header)>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

Anna Maria College is writing to inform you of a recent data security event that may affect the privacy of some of your information. Although Anna Maria College is currently unaware of any misuse of your information, we are nonetheless providing you with details about the incident, Anna Maria College's response, and steps you may take to help protect against misuse of your information, should you feel it necessary to do so.

What Happened? On or about April 20, 2021, Anna Maria College discovered suspicious activity involving certain employee email accounts and initiated an investigation. As part of the investigation, which was conducted by third-party forensic specialists, it was determined that certain employee email accounts were accessed without authorization between January 25, 2021 to April 20, 2021. The investigation could not confirm what specific information within these accounts may have been accessed by the unauthorized individual. Therefore, in an abundance of caution, Anna Maria College then undertook a diligent and comprehensive review of the entire contents of the impacted email accounts to determine the full universe of information present in these accounts and potentially subject to unauthorized access. On or around October 25, 2021, the full scope of this comprehensive review was completed, and Anna Maria College confirmed that certain information related to you was present in the relevant accounts at the time of the incident, and thus potentially accessible.

What Information Was Involved? The information related to you that may be affected includes: <<b2b_text_1(name, data elements)>>. Please note that while our investigation has not identified any actual or attempted misuse of your information, we are providing you this notice to ensure you are aware of this incident.

What We Are Doing. Data privacy and security are among Anna Maria College's highest priorities, and there are extensive measures in place to protect information in Anna Maria College's care. Upon discovery, Anna Maria College promptly commenced an investigation with the assistance of third-party cyber security specialists to confirm the nature and scope of this incident. Anna Maria College is providing notice of this incident to impacted individuals and pertinent state and/or federal regulators. As part of Anna Maria College's ongoing commitment to the security of information, all policies and procedures are being reviewed and enhanced where possible, additional safeguards are being implemented, and workforce training is being conducted to reduce the likelihood of a similar event in the future.

As an added precaution, we are also offering one year of complimentary access to identity monitoring services through Kroll. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration. If you wish to activate the identity monitoring services, you may follow the instructions included in the *Steps You Can Take to Help Protect Personal Information*.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, explanation of benefits, and credit reports for suspicious activity. You may also review the information contained in the attached *Steps You Can Take to Help Protect Personal Information*. We encourage you to activate the complimentary identity monitoring services being provided by Anna Maria College. Anna Maria College will cover the cost of these services; however, you will need to activate these services as we are unable to do so on your behalf.

For More Information. We understand you may have questions that are not addressed in this letter. If you have additional questions, or need assistance, please call our toll-free number at (855) 912-1538, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays. Please have your membership number ready.

We apologize for any inconvenience this incident may have caused you.

Sincerely,

Michael Miers
Executive Vice President & Chief Information Officer
Anna Maria College

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Identity Monitoring

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

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

You have until *<<b2b_text_6(activation deadline)>>* to activate your identity monitoring services.

Membership Number: *<<Membership Number s_n>>*

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

If you prefer to activate these services offline and receive monitoring alerts via the US Postal Service, you may activate via our automated phone system by calling 1-888-653-0511, Monday through Friday, 8:00 a.m. to 5:30 p.m. Central Time, excluding major U.S. holidays. Please have your membership number located in your letter ready when calling. Please note that to activate monitoring services, you will be required to provide your name, date of birth, and Social Security number through our automated phone system.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

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

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll 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.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

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 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 credit 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, 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 credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
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; 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 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. Anna Maria College is located at 50 Sunset Lane, Paxton, MA 01612.

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 Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; 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 88 Rhode Island residents impacted by this incident.