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FEB 16 2021

CONSUMER PROTECTION

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

February 10, 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 The Arc of Chester County ("The Arc") located at 900 Lawrence Drive West Chester, PA 19380, and are writing to notify your office of an incident that may affect the security of some personal information relating to one (1) New Hampshire resident. 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, The Arc 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 March 12, 2020, The Arc became aware of unusual activity in employee email accounts. Upon discovery, The Arc immediately launched an investigation which included working with third-party forensic specialists to determine the full nature and scope of this incident. The investigation determined that an unknown individual may have had access to certain employees' email accounts for less than 24 hours on March 12, 2020. The forensic specialists were unable to determine whether any specific emails within the accounts had been viewed. Therefore, The Arc began a systematic and comprehensive review of the contents of the email accounts to determine what information was contained therein and to whom it related. The Arc subsequently confirmed personal information was present in the email accounts due to the day-to-day operations of The Arc. The Arc then reviewed its files to determine address and contact information for those individuals. The review was a long a thorough process that included review of multiple databases to ensure appropriate contact information was available to ensure notification of affected individuals. On January 26, 2021, this process was complete. Although The Arc is unaware of

any actual or attempted misuse of any personal information, The Arc provided notice to potentially impacted individuals out of an abundance of caution.

The information subject to potential unauthorized access includes name, address, Social Security number, and driver's license/state identification number.

#### **Notice to New Hampshire Resident**

On February 10, 2021, The Arc provided written notice of this incident to potentially affected individuals, which includes one (1) New Hampshire resident. 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, The Arc moved quickly to investigate and respond to the incident, assess the security of The Arc systems, and notify potentially affected individuals. The Arc is also working to implement additional safeguards. The Arc is providing potentially impacted individuals with complimentary access to credit monitoring services for twelve (12) months through TransUnion.

Additionally, The Arc 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. The Arc 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) 930-4784.

Very truly yours,



Jeffrey J. Boogay of  
MULLEN COUGHLIN LLC

# **EXHIBIT A**



Achieve with us.

Return Mail Processing Center  
P.O. Box 6336  
Portland, OR 97228-6336

<<Mail ID>>  
<<Name 1>>  
<<Name 2>>  
<<Address 1>>  
<<Address 2>>  
<<Address 3>>  
<<Address 4>>  
<<Address 5>>  
<<City>><<State>><<Zip>>  
<<Country>>

<<Date>>

<<Variable Header>>

Dear <<Name 1>>:

The Arc of Chester County (“The Arc”) writes to notify you of an incident that may affect the privacy of some of your personal information. The Arc takes the protection of your information very seriously, and although we have no evidence of actual or attempted misuse of your information, this letter provides details of the incident, our response, and resources available to you to help protect your personal information from possible misuse, should you feel it is appropriate to do so.

**What Happened?** On or about March 12, 2020, The Arc became aware of unusual activity in employee email accounts. Upon discovery, we immediately launched an investigation which included working with third-party forensic specialists to determine the full nature and scope of this incident. The investigation determined that an unknown individual may have had access to certain employees’ email accounts for less than 24 hours on March 12, 2020. Therefore, we began a systematic and comprehensive review of the contents of the email accounts to determine what information was contained therein and to whom it related. We subsequently confirmed personal information was present in the email accounts due to the day-to-day operations of The Arc. We then reviewed our files to determine address and contact information for those individuals. The review was a long and thorough process that included review of multiple databases to ensure appropriate contact information was available to ensure notification of affected individuals. On January 26, 2021, this process was complete. Although we are unaware of any actual or attempted misuse of your personal information, we are providing you this notification out of an abundance of caution because your information was present in the email accounts.

**What Information Was Involved?** The information present in the email accounts at the time of the incident included your first and last name and the following identifiers: <<Data Elements>>.

**What Are We Doing?** Information privacy and security are among our highest priorities. We have strict security measures in place to protect information in our care. Upon discovering this incident, we immediately took steps to confirm the security of our systems, including our employee email accounts. We have implemented additional measures to further protect information, including enhanced email security, multi-factor authentication requirements for all employee email accounts, and mandatory employee cyber awareness training. We do not believe there was any access or threat to your information, however, in an abundance of caution, we are notifying potentially impacted individuals, including you, so that you are aware and may take steps to best protect your information, should you feel it is appropriate to do so.

We arranged to have TransUnion protect your identity for twelve (12) months at no cost to you as an added precaution.

*The mission of The Arc of Chester County is to advocate, educate and provide services to empower individuals with disabilities and their families to enhance the quality of their lives. The official registration and financial information of The Arc of Chester County may be obtained from the Pennsylvania Department of State by calling toll free within Pennsylvania 1-800-732-0999. Registration does not imply endorsement. The Arc of Chester County is a 501(c)(3) nonprofit organization—contributions to which are tax deductible to the fullest extent permitted by law.*

900 Lawrence Drive | West Chester, PA 19380 | T 610 696-8090 | F 610-696-8300 | [www.arcofchestercounty.org](http://www.arcofchestercounty.org) | [info@arcofchestercounty.org](mailto:info@arcofchestercounty.org)  
The Arc of Chester County is affiliated with The Arc of Pennsylvania, The Arc of The United States, and The United Way.



**What Can You Do?** We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. You may review the information contained in the attached “Steps You Can Take to Protect Your Information.” You may also enroll to receive the identity protection services we are making available to you. There is no charge to you for the cost of this service; however, you will need to enroll yourself in this service.

**For More Information.** We recognize that you may have questions not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 800-646-6309 (toll free), Monday through Friday, 8:00 am to 8:00 pm Central Time.

We sincerely regret this incident occurred. Protecting your information is important to us, and The Arc remains committed to safeguarding the information of those in our care.

Sincerely,



Jeanne Meikrantz  
Executive Director  
The Arc of Chester County

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## Steps You Can Take to Protect Your Information

### **Enroll in Complimentary Credit Monitoring**

As a safeguard, we have arranged for you to enroll, **at no cost to you**, in an online credit monitoring service (*myTrueIdentity*) for one year provided by TransUnion Interactive, a subsidiary of TransUnion,<sup>®</sup> one of the three nationwide credit reporting companies.

#### **How to Enroll: You Can Sign Up Online or via U.S. Mail Delivery**

- To enroll in this service, go to the *myTrueIdentity* website at **www.MyTrueIdentity.com** and, in the space referenced as “Enter Activation Code,” enter the 12-letter Activation Code <<Insert Unique 12-letter Activation Code>> and follow the three steps to receive your credit monitoring service online within minutes.
- If you do not have access to the Internet and wish to enroll in a similar offline, paper-based credit monitoring service, via U.S. mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the six-digit telephone passcode <<Insert static 6-digit Telephone Pass Code>> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and <<Enrollment Deadline>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

#### **Additional Details Regarding Your 12-Month Complimentary Credit Monitoring Service:**

- Once you are enrolled, you will be able to obtain one year of unlimited access to your TransUnion credit report and credit score.
- The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, changes of address, and more.
- The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

### **Monitor Accounts, Financial, and Medical Billing Statements**

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, medical bills, explanation of benefits (EOBs), and credit reports for suspicious charges or claims. Under U.S. law you are entitled to one (1) free credit report annually from each of the three (3) major credit reporting bureaus. 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 contact the three major credit bureaus directly to request a free copy of your credit report.

You have the 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. The security 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 security 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 security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

**Experian**  
PO Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

**TransUnion**  
P.O. Box 160  
Woodlyn, PA 19094  
1-888-909-8872  
[www.transunion.com/credit-freeze](http://www.transunion.com/credit-freeze)

**Equifax**  
PO Box 105788  
Atlanta, GA 30348-5788  
1-800-685-1111  
[www.equifax.com/personal/  
credit-report-services](http://www.equifax.com/personal/credit-report-services)

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In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.).
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your file at no cost. An initial fraud alert is a one (1) 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 agencies listed below:

**Experian**  
P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/fraud/center.html](http://www.experian.com/fraud/center.html)

**TransUnion**  
P.O. Box 2000  
Chester, PA 19016  
1-800-680-7289  
[www.transunion.com/fraud-victim-resource/  
place-fraud-alert](http://www.transunion.com/fraud-victim-resource/place-fraud-alert)

**Equifax**  
P.O. Box 105069  
Atlanta, GA 30348  
1-888-766-0008  
[www.equifax.com/personal/  
credit-report-services](http://www.equifax.com/personal/credit-report-services)

### **Additional Information**

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission can 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); 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.

**Maryland Residents:** Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place, Baltimore, MD 21202, [www.oag.state.md.us/Consumer](http://www.oag.state.md.us/Consumer), Telephone: 1-888-743-0023 (within Maryland) or 1-410-576-6300. **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 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 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 a 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. You can review your rights pursuant to the Fair Credit Reporting Act by visiting [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf), or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580. **New York Residents:** the Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <https://ag.ny.gov/>. **North Carolina Residents:** Office of the Attorney General of North Carolina, Consumer Protection Division, 9001 Mail Service Center Raleigh, NC 27699-9001, [www.ncdoj.gov](http://www.ncdoj.gov), Telephone: 1-919-716-6400, 877-566-7226 (toll free within NC). **Oregon Residents:** Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, [www.doj.state.or.us/](http://www.doj.state.or.us/), Telephone: 877-877-9392. **Rhode Island Residents:** Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, [www.riag.ri.gov](http://www.riag.ri.gov), Telephone: 401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 0 Rhode Island residents impacted by this incident. **Washington D.C. Residents:** the Office of Attorney General for the District of Columbia can be reached at: 400 6th St. NW, Washington, D.C. 20001; 1-202-442-9828; <https://oag.dc.gov>. **All US Residents:** Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, [www.consumer.gov/idtheft](http://www.consumer.gov/idtheft), 1-877-IDTHEFT (438-4338), TY: 1-866-653-4261.

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