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November 6, 2020

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**VIA E-MAIL (ATTORNEYGENERAL@DOJ.NH.GOV)**

The Honorable Gordon MacDonald  
Attorney General of the State of New Hampshire  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

***Re: Notification of a Data Security Incident***

Dear Attorney General MacDonald:

We represent Atlantic Federal Credit Union (“Atlantic”) in connection with an incident that involved the personal information of two (2) New Hampshire residents and provide this notice on behalf of Atlantic pursuant to N.H. REV. STAT. ANN. § 359-C:20. This notice will be supplemented, if necessary, with any new significant facts discovered subsequent to its submission. While Atlantic is notifying you of this incident, Atlantic does not waive any rights or defenses relating to the incident or this notice, or the applicability of New Hampshire law on personal jurisdiction.

**NATURE OF THE SECURITY BREACH OR UNAUTHORIZED USE OR ACCESS**

On November 1, 2020, Atlantic learned that a misconfiguration in the processing of electronic statements temporarily gave certain members access to the electronic statements of certain other members. Upon discovering the incident, Atlantic immediately removed electronic statement access and began an investigation. Based on Atlantic’s investigation, the misconfiguration that caused the error was in place on November 1, 2020 from 12:57 AM until 12:30 PM. The information contained in the account statements includes members’ names, addresses, member numbers, and recent transaction history. This incident did not involve any individuals’ Social Security numbers, driver’s license numbers, or account pin numbers or passwords. At this point, Atlantic is not aware of any fraud or identity theft to any individual as a result of this incident.

**NUMBER OF NEW HAMPSHIRE RESIDENTS AFFECTED**

Atlantic determined that two (2) New Hampshire residents may have been impacted by this incident. Atlantic began notifying the impacted members on November 4, 2020 and continued

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Atlanta Boston Chicago Dallas Denver Houston Kansas City Los Angeles Nashville New York Phoenix  
St. Louis San Francisco Seattle Washington, D.C. Wilmington  
Polsinelli PC, Polsinelli LLP in California



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the notifications through November 5, 2020. Atlantic placed telephone calls to the members and followed the calls up with a formal notification letter. The notification letter includes an offer for complimentary credit monitoring and identity theft protection. Included in the notification is also information on ways the members can protect themselves against potential fraud and identity theft, as well as a telephone number they can call if they have any questions regarding the incident. Out of an abundance of caution, Atlantic is also providing its impacted members the opportunity to change their member number if they so choose. A sample of the member notification letter is enclosed herewith.

### **STEPS TAKEN RELATING TO THE INCIDENT**

Upon becoming aware of the incident, Atlantic immediately removed electronic statement access and began working to identify and notify the potentially impacted members. Atlantic has taken immediate steps to review its policies and procedures to reduce the likelihood that this type of incident will occur in the future. Finally, as discussed above, Atlantic is notifying impacted individuals, providing them complimentary credit monitoring and identity theft protection, and providing them with information on how they can protect themselves against fraudulent activity and identity theft.

### **CONTACT INFORMATION**

Please contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael J. Waters".

Michael J. Waters



Federal Credit Union

November 5, 2020

Dear [REDACTED],

Atlantic Federal Credit Union values and respects the privacy of your information, which is why we are writing to advise you of a recent incident that may have involved some of your personal information. We have no reason to believe that your personal information has been or will be misused. Nonetheless, we are writing to advise you about the incident and to provide you with guidance on what you can do to protect yourself, should you feel it is appropriate to do so.

On November 1, 2020, we learned that a misconfiguration in the processing of e-statements temporarily gave certain members access to the electronic statements of certain other members. Upon discovering the incident, we immediately removed e-statement access and we began an investigation. Based on our investigation, the misconfiguration that caused the error was in place from 11/1/20, 12:57 AM – 11/1/20, 12:30 PM and only impacted a small number of members. We have determined that another member may have viewed your electronic account statement. As you know, the information on your account statement includes your name, address, member number, and recent transaction history. This incident did not involve your Social Security number.

We have already contacted the other member and requested that they disregard any information they may have viewed and delete any information they may have downloaded. We have no reason to believe the member has misused or will misuse any of your information. While we believe the risk to your account is low, you have the option of changing your member number. If you would like to discuss changing your member number, or if you have any other questions regarding this incident, please contact us at the number below.

Although we are not aware of any instances of fraud or identity theft and we believe the risk to you is low, we are offering you a complimentary one-year membership of Experian IdentityWorks<sup>SM</sup> Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you, and enrolling in this program will not hurt your credit score. **For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please contact us at the number provided below.**

Atlantic values the trust you place in us to protect your privacy. We take our responsibility to safeguard your personal information seriously, and have taken immediate steps to review our policies and procedures to reduce the likelihood that this type of incident will occur in the future. I apologize for any inconvenience or concern this incident might cause. For further information and assistance, please call 800.834.0432 ext. 6700 from 8:00 a.m. – 5:00 p.m. Eastern, Monday through Friday

Sincerely,

Scott Chretien  
President/CEO  
Atlantic Federal Credit Union

## Additional Important Information

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft. For more information and to contact the FTC, please visit [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft) or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

**Credit Reports:** You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting [www.annualcreditreport.com](http://www.annualcreditreport.com), by calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print a copy of the request form at <https://www.annualcreditreport.com/manualRequestForm.action>.

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is as follows:

Equifax  
1-866-349-5191  
[www.equifax.com](http://www.equifax.com)  
P.O. Box 740241  
Atlanta, GA 30374

Experian  
1-888-397-3742  
[www.experian.com](http://www.experian.com)  
P.O. Box 2002  
Allen, TX 75013

TransUnion  
1-800-888-4213  
[www.transunion.com](http://www.transunion.com)  
P.O. Box 2000  
Chester, PA 19016

**Fraud Alerts:** You may want to consider placing a fraud alert on your credit report. A fraud alert is free and will stay on your credit report for one (1) year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at [www.annualcreditreport.com](http://www.annualcreditreport.com).

**Credit and Security Freezes:** You may have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:

Equifax Security Freeze  
1-888-298-0045  
[www.equifax.com](http://www.equifax.com)  
P.O. Box 105788  
Atlanta, GA 30348

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

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