



MULLEN
COUGHLIN_{LLC}

RECEIVED
MAY 13 2019
CONSUMER PROTECTION

James E. Prendergast
Office: 267-930-4798
Fax: 267-930-4771
Email: jprendergast@mullen.law

1275 Drummers Lane, Suite 302
Wayne, PA 19087

May 7, 2019

VIA U.S. MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Attorney General MacDonald:

We represent Augustana College, 639 38th Street, Rock Island, Illinois, 61202, and write to provide notice to your office of an incident that may affect the security of personal information relating to certain New Hampshire residents. This notice may be supplemented if significant facts are learned subsequent to its submission. By providing this notice, Augustana College does not waive any rights or defenses regarding the applicability of New Hampshire law, the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

On or about February 18, 2019 Augustana College ("Augustana") discovered a ransomware attack upon one of its servers. Augustana took immediate steps to contain the attack and remediate the impacted server. Augustana immediately launched an investigation into the incident, and hired third party investigators to confirm what information, if any, may have been accessed. Through this investigation, on or about March 18, 2019, Augustana determined that some of the information contained on the server was potentially impacted.

On or about April 1, 2019, as the result of a thorough review of the potentially impacted contents of the server, the investigation confirmed the population of potentially impacted

individuals. The types of personal information potentially impacted in relation to this incident include the name, Social Security number and date of birth.

Notice to New Hampshire Residents

On May 7, 2019, Augustana began mailing written notice of this incident to the affected individuals, including six (6) New Hampshire residents. Written notice will be provided in substantially the same form as the letter attached hereto as *Exhibit A*.

Other Steps Taken and to Be Taken

Upon discovering this incident, Augustana promptly began an investigation to determine the nature and scope of this incident, including identifying the individuals who may be affected, putting in place resources to assist them, and providing them with notice of this incident. Augustana identified and mitigated the issue by closing the vulnerability on its server, taking the server offline, and bringing in third party forensics to assess the incident. Augustana has introduced additional steps to strengthen the security of its systems.

Augustana is providing potentially affected individuals access to twenty four (24) months of credit monitoring and identity restoration services, through Experian. Additionally, Augustana is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud, including 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 identity theft and fraud 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. Augustana is also notifying other state regulators, as required.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 267-930-4798.

Very truly yours,

A handwritten signature in black ink, appearing to read 'JEP', written over a horizontal line.

James E. Prendergast of
MULLEN COUGHLIN LLC

EXHIBIT A

Augustana College

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

May 1, 2019



E6242-L01-0123456
SAMPLE A SAMPLE - L01 - Augustana - Individual Notice
APT 123
123 ANY ST
ANYTOWN, US 12345-6789

Dear Sample A Sample:

Augustana College ("Augustana"), recently discovered an incident that may affect the security of your personal information. We want to provide you with information about the incident, steps we are taking in response, and steps you can take to better protect against the possibility of identity theft and fraud, should you feel it is appropriate.

What happened? On or about February 18, 2019, Augustana discovered a ransomware attack upon one of its servers. Augustana immediately launched an internal investigation and engaged the assistance of third-party forensic investigators. Through this investigation, on or about March 18, 2019, Augustana confirmed there was unauthorized access to one of its servers.

What information was involved? On or about April 1, 2019, after a thorough review process conducted by external forensic investigators, Augustana confirmed the impacted server contained the following personal information related to you: Exposed Data Element 1, Exposed Data Element 2, Exposed Data Element 3. Augustana currently has no evidence of attempted or actual misuse of this information.

What are we doing? We take this incident and the security of your personal information seriously. Augustana identified and mitigated the incident by immediately taking the affected server offline and moving the stored information onto other servers. We have been working with third party vendors to enhance the existing security systems in place and to guard against future attacks of this nature. We also are exploring how we can continue to enhance the security of our systems, including providing additional training to users on how to identify malicious links. We are providing you with information you can use to better protect yourself against identity theft and fraud, as well as access to 24 months of complimentary credit monitoring and identity restoration services with Experian. Instructions for enrolling in the credit monitoring services, as well additional information on how to better protect against identity theft or fraud, are included in the attached *Privacy Safeguards*.

What can you do? Review the *Privacy Safeguards* for additional information on how to better protect against identity theft and fraud. Enroll to receive the complimentary credit monitoring and identity restoration services described above.

For more information. We understand you may have questions that are not addressed in this notice. You can call our toll-free dedicated assistance line at 855-662-8108. This free line is available Monday through Friday from 6:00 a.m. - 6:00 p.m. PST, and Saturday and Sunday 8:00 a.m. - 5:00 p.m. PST excluding major national holidays. We apologize for any inconvenience or concern this incident causes you.

Sincerely,

Kirk Anderson
Business Officer

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E6242-L01

PRIVACY SAFEGUARDS

Enroll in Credit Monitoring.

To help protect your identity, we are offering a complimentary two-year membership of Experian's® IdentityWorksSM. 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:

- Ensure that you **enroll by: July 31, 2019** (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: www.experianidworks.com/3bcredit
- Provide your activation code: [REDACTED]

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 855-662-8108 by **July 31, 2019**. Be prepared to provide engagement number **DB12125** as proof of eligibility for the identity restoration services by Experian.

Additional details regarding your 24-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.¹
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance²:** Provides coverage for certain costs and unauthorized electronic fund transfers.

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 855-662-8108. 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 one year 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. You will also find self-help tips and information about identity protection at this site.

¹ Offline members will be eligible to call for additional reports quarterly after enrolling.

² Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Monitor Your Accounts.

We also 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. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit 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	TransUnion P.O. Box 2000 Chester, PA 19016 1-888-909-8872 www.transunion.com/credit-freeze	Equifax PO Box 105788 Atlanta, GA 30348-5788 1-800-685-1111 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 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 2002 Allen, TX 75013 1-888-397-3742 www.experian.com/fraud/center.html	TransUnion P.O. Box 2000 Chester, PA 19106 1-800-680-7289 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
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For More 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, 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 promptly reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, www.ncdoj.gov.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, 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 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 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-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.