



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

FEB 13 2020

CONSUMER PROTECTION

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Colleyville, TX 76034

February 10, 2020

VIA U.S. MAIL

Consumer Protection Bureau
Office of the New Hampshire Attorney General
33 Capitol Street
Concord, NH 03301

Re: Supplemental Notice of Data Event

Dear Sir or Madam:

We continue to represent Beatitudes Campus (“Beatitudes”) located at 1610 W. Glendale Ave, Phoenix, AZ 85021, and are writing to update your office regarding an incident that may affect the security of some personal information relating to one (1) New Hampshire resident. As the data audit has now been completed, this will be the final notification provided for this matter as it relates to the July 29, 2019 data security incident. By providing this notice, Beatitudes 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

As noted in our prior correspondence, on or around July 29, 2019, Beatitudes discovered that it was experiencing a phishing attack. An employee email account was compromised, which allowed a hacker to distribute phishing emails to Beatitudes Campus employees. In an effort to determine the nature and scope of information that was potentially accessed, Beatitudes Campus engaged a forensic team to investigate the incident. Beatitudes opted to notify individuals potentially impacted of this incident on a rolling basis, as the information became available pursuant to the ongoing data audit, in accordance with New Hampshire law.

Following a thorough and exhaustive review process, the audit confirmed the identities of an additional group of impacted individuals, including one (1) New Hampshire resident. The information that could have been subject to unauthorized access includes name, Social Security number, and medical information.

Notice to New Hampshire Resident

On or about February 10, 2020, Beatitudes will provide written notice of this incident to all affected individuals, which includes one (1) New Hampshire resident. 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

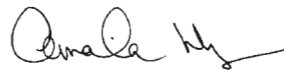
As previously discussed, following the discovery of this incident Beatitudes moved quickly to investigate and respond to the incident, assess the security of Beatitudes' systems, and notify potentially affected individuals. Beatitudes has also implemented additional safeguards and provided additional training to its employees pertaining to data security, including phishing. Beatitudes is providing access to credit monitoring services for between one and two (1-2) years, through *myTrueIdentity*, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Beatitudes 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. Further, Beatitudes 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) 930-1697.

Very truly yours,



Amanda Harvey of
MULLEN COUGHLIN LLC

ANH/wds
Enclosure

EXHIBIT A



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>>

Dear <<Name 1>>:

Beatitudes Campus writes to notify you of a recent phishing incident that may affect the security of you or your loved one's personal information. We acknowledge the sensitivity and apologize to be sending this information especially if your loved one has passed away. We are required to attempt to notify those residents who may have been affected even if they are no longer living. The phishing incident may have exposed you or your loved one's name, social security number and medical information. Phishing is the fraudulent practice of sending emails from a hacker purporting to be from reputable companies in order to induce individuals to reveal personal information. We take the security of personal information seriously and want to provide you with information and resources you can use to protect you and your loved one's information. This letter contains information about the incident and the resources we are making available to you.

What Happened:

On or around July 29, 2019, Beatitudes Campus discovered that it was experiencing a phishing attack. An employee email account was compromised, which allowed a hacker to distribute phishing emails to Beatitudes Campus employees. In an effort to determine what information was potentially accessed, we engaged a forensic team to investigate the incident. The forensic investigation determined that there was no evidence to suggest that your sensitive information had been misused; however, out of an abundance of caution we are providing you with notice of this event so that you may take the necessary steps to protect your sensitive information.

What We Are Doing:

In light of the compromise, we have conducted a review of our policies and procedures, and have sought to ensure that we have sufficient technology and security measures in place so as to prevent similar instances from occurring in the future. We have also conducted a forensic investigation, which has allowed us to strengthen our digital environment. We apologize for any inconvenience this may have caused.

We value the safety of your personal information and are therefore offering identity theft protection services through Epiq, which includes TransUnion 1B Credit Monitoring/ID Theft Restoration. This service includes twelve (12) months of credit monitoring, insurance reimbursement policy, exclusive educational materials and fully managed identity theft recovery services. With this protection, TransUnion 1B Credit Monitoring/ID Theft Restoration will help you resolve issues if your identity is compromised.

What You Can Do:

We have arranged for you to enroll, at no cost for one year, in an online credit monitoring service, called *myTrueIdentity*. This service is provided by TransUnion Interactive, a subsidiary of Transunion®, one of the three nationwide credit reporting companies.

To enroll in the credit monitoring service online, please follow the steps below:

1. Go to the *myTrueIdentity* website at **www.mytrueidentity.com**.
2. In the space referenced as "Enter Activation Code" enter the following 12-letter Activation Code <<Activation Code>> and press enter on your computer.
3. You will be asked to provide information in three steps. Once complete you will have the online credit monitoring service.

You may also call 855-288-5422 to set up the credit monitoring service if you do not wish to enroll online.

You can enroll in the credit monitoring service anytime between now and <<Enrollment Deadline>>.

Due to privacy laws, Beatitudes Campus 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.

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

If you believe you may be a victim of identity theft because of the phishing incident at Beatitudes Campus, please call TransUnion's Fraud Response Service toll-free hotline at **1-855-288-5422**. When prompted, enter the following 6-digit telephone pass code <<Pass Code>> to speak to a TransUnion representative about your identity theft issue.

For More Information

Please refer to the earlier information on credit monitoring enrollment. Also, you will need to reference the following enrollment code below when calling or enrolling on the website, so please do not discard this letter.

Your Enrollment Code: <<Activation Code>>

Please call 855-930-0683, Monday through Friday from 9 am to 9 pm Eastern time, for assistance or for any additional questions you may have.

We apologize for any inconvenience this may have caused.

Sincerely,



Michelle L. Just, President & CEO

Additional Important Information

For residents of Hawaii, Michigan, Missouri, Virginia, Vermont, and North Carolina: It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

For residents of Illinois, Iowa, Maryland, Missouri, North Carolina, Oregon, and West Virginia:

It is required by state laws to inform you that you may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

For residents of Iowa:

State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon:

State laws advise you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of Maryland, Rhode Island, Illinois, and North Carolina:

You can obtain information from the Maryland and North Carolina Offices of the Attorneys General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Maryland Office of the Attorney General

Consumer Protection
Division
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
www.oag.state.md.us

Rhode Island Office of the Attorney General

Consumer Protection
150 South Main Street
Providence RI 02903
1-401-274-4400
www.riag.ri.gov

North Carolina Office of the Attorney General

Consumer Protection
Division
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-566-7226
www.ncdoj.com

Federal Trade Commission

Consumer Response Center
600 Pennsylvania Ave, NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)
www.ftc.gov/idtheft

For residents of Massachusetts: It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft.

For residents of all states:

Fraud Alerts: You can place fraud alerts with the three credit bureaus at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The contact information for all three credit bureaus is below:

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, or regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a freeze. You may obtain a security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
www.freeze.equifax.com
800-525-6285

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
www.experian.com/freeze
888-397-3742

TransUnion (FVAD)
P.O. Box 2000
Chester, PA 19022
freeze.transunion.com
800-680-7289

More information can also be obtained by contacting the Federal Trade Commission listed above.