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December 21, 2017

Via Electronic Mail:
DOJ-CPB@doj.nh.gov

Via U.S. Mail:
Consumer Protection and Antitrust Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Brazos Higher Education Service Corporation, Inc.
Notification of Security Breach pursuant to N.H. Rev. Stat. § 359-C:20, "New Hampshire Right to Privacy Act."

To Whom it May Concern:

On behalf of our client, Brazos Higher Education Service Corporation, Inc., a student loan management company (the "Company"), we hereby inform you of an incident arising from inadvertent transmissions of information by one of the Company's third-party service providers. This incident affected the personal information of approximately 500 U.S. individuals, including two New Hampshire residents. Of the two New Hampshire residents, only one resident was affected as a result of an inadvertent email transmission of personal information in electronic format; the personal information of one other New Hampshire resident was inadvertently disclosed to unintended recipients in paper mailings. Although New Hampshire's law applies to electronic breaches only, the Company has opted to notify all affected New Hampshire residents due to the sensitivity of the information inadvertently disclosed.

Description of the Incident. On November 27, 2017, the Company was notified by one of its third party service providers that the Company inadvertently transmitted certain student loan borrower information to the service provider. As a result of this inadvertent transmission, the service provider inadvertently included certain student loan borrowers' personal information in mailings and/or emails to unintended recipients whose loans are also serviced by the Company. The Company, with the cooperation of the service provider, immediately investigated the exposure to determine which of the borrowers were affected, when and in what format the inadvertent transmissions to unintended recipients occurred, and what types of information were involved.

The investigation required a manual review of groups of PDF documents that were sent by the Company to the third party service provider on various dates during 2016 and 2017 to locate extraneous attachments with identifying information for student loan borrowers that were not intended to be included in the transmissions that resulted in the inadvertent disclosures. The Company then input the identifying information of the affected individuals into the Company's database to determine their mailing information. There were 24

dates on which the Company inadvertently transmitted incorrect information to the service provider. The Company determined that this incident exposed the full name and Social Security number of the affected individuals. The transmissions by the Company, and the subsequent mailings and email transmissions by the service provider, may also have included other information about the affected individuals, such as their loan account numbers or codes, loan balances at given points in time, and the schools attended by the affected individuals. As noted above, the personal information of one New Hampshire resident was inadvertently transmitted by email; personal information of the other New Hampshire resident was inadvertently disclosed to unintended recipients in mailings of paper documents.

Communication with Affected New Hampshire Residents. The affected New Hampshire residents are to be notified using the notification template enclosed with this letter as Exhibit A. The notification letter to the affected New Hampshire residents will be sent by First Class Mail on or about December 22, 2017.

Steps Taken Following the Incident. Immediately after learning of this incident, the Company, with the cooperation of its third party service provider, investigated the incident, as described in more detail above. In addition, the Company has engaged Experian to provide identity theft protection services to the affected individuals, which are being offered at no cost to the individuals. As a result of the incident, the Company has changed its redaction procedures, including adding additional controls (including quality control), to prevent information of borrowers who are not being placed at a third party service provider from being included on documents sent to a service provider. The Company also implemented better technologies to assist in the redaction of the records to ensure that information is completely removed.

In addition, the third party service provider involved in this incident is increasing training for its employees who handle borrower information. The service provider is also limiting the number and level of people who have access to the borrower level documents and who have the ability to send documents that are stored to borrowers. The Company is also in the process of recalling all documents sent to the third party service provider to date, requiring destruction, and resending anything the service provider needs using the new redaction process. The Company is also increasing its review of documents being sent for borrowers placed at the third party service provider to ensure that those being sent are necessary for such service provider to have to provide the services for which the service provider has been contracted.

* * * * *

We trust that this letter and its enclosure provide you with the information required to assess this incident and the Company's response. Please let us know if you have any questions or if we may be of further assistance.

Sincerely,



Theodore P. Augustinos

Enclosure

Exhibit A



THE BRAZOS HIGHER EDUCATION SERVICE CORPORATION, INC.

Date: December 22, 2017

Test
1234 Waco
Waco, Texas 76710

RE: Important Security and Protection Notification
Please read this entire letter.

Dear:

We are contacting you regarding a data security incident that involved your personal information related to your loan managed by Brazos Higher Education Service Corporation, Inc. ("Brazos"). You are one of approximately 500 individuals affected by this incident. Please be assured that we have taken every step necessary to investigate and address the incident, and are reviewing and supplementing our policies and other safeguards to prevent any similar occurrence in the future. We are committed to fully protecting all of the information that is entrusted to us.

What Happened

Brazos inadvertently provided your information to a third party service provider in connection with such provider's services provided on behalf of Brazos for other individuals. As a result, the third party service provider included your personal information in [a mailing/ an email] to [a single/two] unintended recipient[s] whose loan[s] is/are also managed by Brazos on [date].

What Information Was Involved

This incident involved the inadvertent transmission of sensitive personal information, consisting of your full name and Social Security number. The transmission may also have included other information about you such as a loan account number or code, a loan balance at a given point in time, and the school you attended associated with a particular loan.

What We Are Doing

Your information was inadvertently transmitted to another of our borrowers, and we have no reason to believe the individual[s] who obtained your information in error has/have any intention of using it to commit identity theft. Nevertheless, we understand that you may have concerns, and to help protect your identity, we are offering a complimentary (at no cost to you) one-year membership of Experian's® IdentityWorksSM. This product helps you with superior identity detection and resolution of identity theft. To start monitoring your personal information please follow the steps below

1. ENSURE **That You Enroll By: April 30, 2018** (Your code will not work after this date.)
2. VISIT **Experian Identity Works website to enroll: <https://www.experianidworks.com/3bplus>**
3. PROVIDE **Your Activation Code: [code]**
Engagement Number: DB04550

If you have questions about the product, need assistance with identity restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-890-9332 by March 31, 2018. Be prepared to provide the engagement number as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12 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.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Internet Surveillance:** Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

What You Can Do

In addition to enrolling in Identity Works, there are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to the final page of this letter for additional information, including information required to be provided for the residents of certain states.

For More Information

We sincerely apologize for this incident, regret any inconvenience it may cause you, and encourage you to take advantage of the product outlined above. Should you have questions or concerns regarding this matter, please do not hesitate to contact us at (800) 453-0841. Note that our offices will be closed from [date] to [date], but the Experian customer care center stands ready to assist you at (877) 890-9332.

Sincerely,



Ben Litle
VP/Chief Operating Officer

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

** 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

ADDITIONAL GUIDANCE, AND DISCLOSURES FOR RESIDENTS OF CERTAIN STATES:

Your taking steps to protect yourself may include contacting credit reporting agencies as further described below.

PLACE A 90-DAY FRAUD ALERT ON YOUR CREDIT FILE

An initial 90 day security alert indicates to anyone requesting your credit file that you suspect you are a victim of fraud. When you or someone else attempts to open a credit account in your name, increase the credit limit on an existing account, or obtain a new card on an existing account, the lender should take steps to verify that you have authorized the request. If the creditor cannot verify this, the request should not be satisfied. You may contact one of the credit reporting companies below for assistance.

Equifax
PO Box 740241
Atlanta, GA 30374
1-800-525-6285
www.equifax.com

Experian
PO Box 2104
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion
PO Box 2000
Chester, PA 19022
1-800-680-7289
www.transunion.com

You can renew a fraud alert after 90 days. Note that a fraud alert in your file can protect you, but also may delay you when you seek to obtain credit.

PLACE A SECURITY FREEZE ON YOUR CREDIT FILE

If you are very concerned about becoming a victim of fraud or identity theft, a security freeze might be right for you. Placing a freeze on your credit report will prevent lenders and others from accessing your credit report entirely, which will prevent them from extending credit. With a Security Freeze in place, you will be required to take special steps when you wish to apply for any type of credit. This process is also completed through each of the credit reporting companies. The credit reporting agencies may charge a fee to place a freeze, temporarily lift it or permanently remove it. The fee is waived if you are a victim of identity theft and have submitted a valid investigative or law enforcement report or complaint relating to the identity theft incident to the credit reporting agencies. The cost to place and lift a freeze depends on state law. Find your state Attorney General's office at naag.org to learn more.

You may obtain additional information about fraud alerts and security freezes from the Federal Trade Commission, or the consumer reporting agencies. Contact information is provided below for the FTC and above for the consumer reporting agencies.

Notice for Massachusetts residents: The fee for each placement of a freeze, temporary lift of a freeze, or removal of a freeze is \$5.

Notice for Rhode Island residents: The fee for each placement of a freeze, temporary lift of a freeze, or removal of a freeze is \$10.

ORDER YOUR FREE ANNUAL CREDIT REPORTS

We recommend that you remain vigilant for incidents of fraud and identity theft by reviewing your account statements and monitoring your credit report for unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting agencies. You can order your annual free credit report at www.annualcreditreport.com or by calling 877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form, which you can obtain from the U.S. Federal Trade Commission's ("FTC") website at www.consumer.ftc.gov, to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company. Note that thieves may hold stolen information to use at different times. Checking your credit reports periodically can help you spot problems and address them quickly.

Notice for residents of Colorado, Georgia, Maryland, Massachusetts, Michigan, Missouri, New Jersey, New Mexico, Puerto Rico, Vermont, and Virginia: You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain these additional report(s).

MANAGE YOUR PERSONAL INFORMATION

Take steps such as: carrying only essential documents with you; being aware of whom you are sharing your personal information with and shredding receipts, statements, and other sensitive information.

USE TOOLS FROM CREDIT PROVIDERS

Carefully review your credit reports and bank, credit card and other account statements. Be proactive and create alerts on credit cards and bank accounts to notify you of activity. If you discover unauthorized or suspicious activity on your credit report or by any other means, file an identity theft report with your local police and contact a credit reporting company.

OBTAIN MORE INFORMATION ABOUT IDENTITY THEFT AND WAYS TO PROTECT YOURSELF

- Visit <http://www.experian.com/credit-advice/topic-fraud-and-identity-theft.html> for general information regarding protecting your identity.
- The Federal Trade Commission has an identity theft hotline: 877-438-4338; TTY: 1-866-653-4261. They also provide information on-line at www.ftc.gov/idtheft.

Contact the Federal Trade Commission and the Office of your State Attorney General. If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your home state. You may also contact these agencies for information on how to prevent or avoid identity theft.

You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, www.ftc.gov/bcp/edu/microsites/idtheft/, 1-877-IDTHEFT (438-4338).

Notice for Maryland residents: You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us, 1-888-743-0023.

Notice for North Carolina residents: You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, www.ncdoj.com, 1-877-566-7226.

Reporting of identity theft and obtaining a police report.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, file a police report. Get a copy of the police report; you may need it to clear up the fraudulent debts.

If your personal information has been misused, visit the FTC's site at IdentityTheft.gov to get recovery steps and to file an identity theft complaint. Your complaint will be added to the FTC's Consumer Sentinel Network, where it will be accessible to law enforcers for their investigations.

Notice for Massachusetts residents: You have the right to obtain a police report if you are a victim of identity theft.

Notice for Oregon residents: You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.

Notice for Rhode Island residents: You have the right to obtain a police report if you are a victim of identity theft.

Notice of Rights under Fair Credit Reporting Act.

Notice for New Mexico residents: You have the right to obtain a notice of your rights under the federal Fair Credit Reporting Act. You can access a copy of this notice, A Summary of Your Rights Under the Fair Credit Reporting Act, at <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.