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MULLEN
COUGHLIN^{LLC}
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July 6, 2018

INTENDED FOR ADDRESSEE(S) ONLY

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 Gordon J. MacDonald:

We represent Career & Technology Education Centers of Licking County (“C-TEC”), 150 Price Road, Newark, Ohio 43055 and are writing to notify your office of an incident that may affect the security of personal information relating to two (2) New Hampshire residents. The investigation into this event is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, C-TEC does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Nature of the Data Event

On May 25, 2018 it was determined through a forensic investigation that an unauthorized actor used a brute force attack to gain access to C-TEC’s network. It is believed that the attack is the result of an attempted but unsuccessful ransomware attack and email fraud. There was one file on the network that was accessible to the attacker on 2/12/18 for approximately 4 minutes containing a list of information including 9,578 names and SSNs. There is no evidence that this file was accessed. Address information for these individuals was not included in the data file. C-TEC obtained the addresses for these individuals, including their states of residence by searching internal records and United States Postal Service Records between June 20, 2018 and July 2, 2018.

Notice to New Hampshire Residents

C-TEC provided written notice to potentially affected individuals by mail on or about July 5, 2018, which includes two (2) New Hampshire residents. Written notice was provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and to Be Taken

Upon discovering the incident, C-TEC moved quickly to identify those that may be affected, to put in place resources to assist them, and to provide them with notice of this incident.

C-TEC is providing all potentially affected individuals complimentary access to 12 free months of credit and identity monitoring services, including identity restoration services, through Kroll. Additionally, C-TEC 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, 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. C-TEC is also providing written notice of this incident to the F.B.I. and other state regulators as necessary.

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,



Jim Prendergast of
MULLEN COUGHLIN LLC

JEP/vr
Enclosure

EXHIBIT A



<<Date>> (Format: Month Day, Year)

<<MemberFirstName>> <<MemberMiddleName>> <<MemberLastName>> <<Suffix>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<ZipCode>>

Re: Notice of Data Breach

Dear <<MemberFirstName>> <<MemberLastName>>,

I am writing to make you aware of a recent data privacy event that may affect the security of your personal information. We take this incident very seriously and are providing you with information and access to resources so that you can protect your personal information, should you feel it is appropriate to do so.

What Happened? C-TEC recently discovered that our computer network system was compromised. Once we learned of potential security issues, we began an investigation with the assistance of a third-party forensic investigation firm to determine the nature and scope of the compromise. During this investigation, it was discovered that on or about February 12, 2018, a data file containing information including your Name and Social Security Number was accessible to an unauthorized individual(s) who gained access to C-TEC's computer network for approximately 4 minutes. We have no indication that the unauthorized actor actually saw or took your data but we cannot exclude that possibility.

What Information Was Involved? The information involved in this incident was a data file that included your name and Social Security Number.

What We Are Doing. The confidentiality, privacy, and security of the information in our care is one of our highest priorities. C-TEC has stringent security measures in place to protect the security of information in our possession. In addition, as part of our ongoing commitment to the security of personal information in our care, we are working to implement additional safeguards regarding the privacy and security of information on our systems. We will be contacting the relevant state Attorneys General.

Complimentary Identity Monitoring Service. As an added precaution, we have arranged for you to enroll, at no cost to you, in an identity monitoring service for twelve (12) months. The cost of this service will be paid by C-TEC. The service will be provided by Kroll. Their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit my.idmonitoringservice.com to activate and take advantage of your identity monitoring services.

You have until October 4, 2018 to activate your identity monitoring services.

Membership Number: <<Member ID>>

To receive credit services by mail instead of online, please call 1-833-221-9232. Additional information describing your services is included with this letter.

What You Can Do. You can review the enclosed "Steps You Can Take to Prevent Identity Theft and Fraud". You can also enroll to receive the free credit monitoring and identity restoration services described above.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-833-221-9232, (toll free), Monday through Friday, 9:00 a.m. to 6:00 p.m. Eastern Time.

C-TEC takes the privacy and security of the personal information in our care seriously. We sincerely regret the inconvenience or concern this incident has caused you.

Sincerely,

A handwritten signature in black ink that reads "Joyce L. Malainy". The signature is written in a cursive style with a large, looped initial "J".

Joyce L. Malainy, Ed.D.
Superintendent

STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

Monitor Your Accounts

Credit Reports. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. 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.

Fraud Alerts. At no charge, you can also have these credit bureaus place a “fraud alert” on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below:

Equifax
P.O. Box 105069
Atlanta, GA 30348
800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19106
800-680-7289
www.transunion.com

Security Freeze. You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer’s credit report without the consumer’s written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft and you provide the credit bureau with a valid police report, it cannot charge you to place, lift, or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. Fees vary based on where you live, but commonly range from \$3 to \$15. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. In order to request a security freeze, you will need to supply your full name, address, date of birth, Social Security number, current address, all addresses for up to five previous years, email address, a copy of your state identification card or driver’s license, and a copy of a utility bill, bank or insurance statement, or other statement proving residence. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
www.freeze.equifax.com

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872
freeze.transunion.com

Additional Information. You can further educate yourself regarding identity theft, security freezes, fraud alerts, and the steps you can take to protect yourself against identity theft and fraud by contacting 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); and TTY: 1-866-653-4261. The Federal Trade Commission encourages those who discover that their information has been misused to file a complaint with them. Instances of known or suspected identity theft should be promptly reported to law enforcement, the Federal Trade Commission, and your state Attorney General. 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 crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim. This notice has not been delayed as the result of a law enforcement investigation.

For Maryland residents, the Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and 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.

For North Carolina residents, the Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at www.ncdoj.gov.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services¹ from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

Web Watcher

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

Public Persona

Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you'll receive an alert.

Quick Cash Scan

Quick Cash Scan monitors short-term and cash-advance loan sources. You'll receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.

\$1 Million Identity Fraud Loss Reimbursement

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

¹ Kroll's activation website is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.