



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

SEP 24 2021

CONSUMER PROTECTION

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309 Fellowship Road, Suite 200
Mt. Laurel, NJ 08054

September 20, 2021

VIA U.S. MAIL

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

Re: Notice of Data Event

Dear Sir or Madam:

We represent Carmel Clay Schools (“Carmel Clay School”) located at 5201 East Main St. Carmel, IN 46033, and are writing to notify your office of an incident that may affect the security of some personal information relating to one (1) New Hampshire resident. This notice may be supplemented with new significant facts learned subsequent to its submission. By providing this notice, Carmel Clay School 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

On February 24, 2021, CCS discovered suspicious activity involving employee email accounts. CCS immediately initiated a password reset to all CCS staff accounts in its environment. CCS promptly launched an investigation, with the assistance of third-party forensics specialists, to determine the nature and scope of this incident. We determined that employee email accounts may have been accessed without authorization between February 15 and February 24, 2021. In response, CCS undertook a diligent and comprehensive review of the entire contents of the email accounts involved in order to determine the type of information contained within the accounts and to whom that information pertained. On August 31, 2021, CCS completed its review of the impacted email accounts and confirmed that the accounts contained sensitive information. The information that could have been subject to unauthorized access includes name, address, and Social Security number.

Notice to New Hampshire Residents

On or about September 20, 2021, Carmel Clay School provided 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

Upon discovering the event, Carmel Clay School moved quickly to investigate and respond to the incident, assess the security of Carmel Clay School systems, and notify potentially affected individuals. Carmel Clay School is also working to implement additional safeguards and training to its employees. Carmel Clay School is providing access to credit monitoring services for one (1) year, through Equifax, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Carmel Clay School 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. Carmel Clay School 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) 930-4842.

Very truly yours,



Vincent F. Regan of
MULLEN COUGHLIN LLC

VFR/bld

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>>

NOTICE OF SECURITY INCIDENT

Dear <<Name 1>>:

Carmel Clay Schools ("CCS") is writing to inform you of a recent incident that may affect the privacy of some of your information. On August 31, 2021 CCS concluded its investigation and review of this incident and confirmed that you were an affected individual who required notice of the event. This notice provides information about the incident, our response, and resources available to help protect your information from possible misuse, should you feel it is necessary to do so.

What Happened? On February 24, 2021, CCS discovered suspicious activity involving employee email accounts. CCS immediately initiated a password reset to all CCS staff accounts in its environment. CCS promptly launched an investigation, with the assistance of third-party forensics specialists to determine the nature and scope of this incident. We determined that employee email accounts were accessed without authorization between February 15 and February 24, 2021. In response, CCS undertook a diligent and comprehensive review of the entire contents of the email accounts involved in order to determine the type of information contained within the accounts and to whom that information pertained. On August 31, 2021, CCS completed its review of the impacted email accounts and confirmed that the accounts contained information related to you.

What Information Was Involved? The investigation determined the impacted accounts included your name and <<Data Elements>>. While CCS has no evidence that your information was actually viewed by an unauthorized individual or misused, we are making you aware of this incident in an abundance of caution.

What CCS is Doing. CCS has strict security measures to protect the information in our possession and has worked to add further technical safeguards to our environment. Following this incident, CCS took immediate steps to increase the security of our environment.

As an added precaution, we are also offering you complimentary access to <<CM Length>> months of credit monitoring and identity restoration services, through Equifax. You will need to enroll yourself in these services if you wish to do so, as we are not able to activate them on your behalf. Please review the instructions contained in the attached *Steps You Can Take to Help Protect Your Personal Information* for additional information on these services.

What You Can Do. We encourage you to review the enclosed *Steps You Can Take to Help Protect Your Personal Information* for additional steps you may take and information on what you can do to better protect against the possibility of identity theft and fraud, should you feel it is appropriate to do so. We also encourage you to enroll in the complimentary credit monitoring services we are offering you.

For More Information. If you have questions about this letter, please call 800-790-8576 between the hours of 8:00 a.m. and 8:00 p.m., Central Time, Monday through Friday.

We sincerely regret any inconvenience or concern this incident may cause.

Sincerely,

A handwritten signature in cursive script that reads "Michael Beresford".

Michael Beresford
Superintendent
Carmel Clay Schools

STEPS YOU CAN TAKE TO HELP PROTECT YOUR PERSONAL INFORMATION

Enroll in Credit Monitoring and Identity Restoration



Enter your Activation Code: <<Activation Code>>

Enrollment Deadline: <<Enrollment Deadline>>

Equifax Credit Watch™ Gold

*Note: You must be over age 18 with a credit file to take advantage of the product.

Key Features

- Credit monitoring with email notifications of key changes to your Equifax credit report
- Daily access to your Equifax credit report
- WebScan notifications¹ when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts², which encourage potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock³
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft⁴

Enrollment Instructions

Go to www.equifax.com/activate.

Enter your unique Activation Code of <<Activation Code>> then click "Submit" and follow these 4 steps:

1. **Register:**
Complete the form with your contact information and click "Continue".
If you already have a myEquifax account, click the 'Sign in here' link under the "Let's get started" header.
Once you have successfully signed in, you will skip to the Checkout Page in Step 4.
 2. **Create Account:**
Enter your email address, create a password, and accept the terms of use.
 3. **Verify Identity:**
To enroll in your product, we will ask you to complete our identity verification process.
 4. **Checkout:**
Upon successful verification of your identity, you will see the Checkout Page.
Click 'Sign Me Up' to finish enrolling.
- You're done!**
The confirmation page shows your completed enrollment.
Click "View My Product" to access the product features.

¹ WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded.

² The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

³ Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit www.optoutprescreen.com.

⁴ The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended "fraud alert" on a credit 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 three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a "credit freeze" on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer's express authorization. The credit 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 credit 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 credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to 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, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may 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 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 reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement. CCS is located at 5201 E. Main St. Carmel, IN 46033.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and oag@dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 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 bureaus 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 violators. 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/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 New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. **There are XX Rhode Island residents impacted by this incident.**