

HUSCH BLACKWELL

Sean Tassi
Partner

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RECEIVED
JUN 18 2018
CONSUMER PROTECTION

June 15, 2018

Consumer Protection and Antitrust Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 033011

Re: Security Incident Notification

Dear Sir/Madam:

We are writing to notify the Office of the Attorney General of a data security incident regarding our client, Central Christian College of Kansas. The College completed an investigation of a security incident that involved the information of one New Hampshire resident, and it has asked us to assist with the state agency notification process.

On July 11, 2017, the College's Information Technology Services ("ITS") created a group email to facilitate responsiveness to inquiries for financial aid support. Emails from prospective and current students should have only been visible to the personnel necessary to administer financial aid. Between July 11, 2017 and April 23, 2018, a student who sent an email to the group email received an email from the group participant. The email from the group participant contained a link to view the group. If a student selected the option to view the group, the student could also view information that was submitted by other students. The College became aware of this security risk on April 23, 2018. After investigating the matter immediately, ITS determined that the group privacy setting was set to public. ITS staff immediately changed the setting to private and confirmed that no one would be able to join or view the group without being granted access by ITS. The affected information may have included the student's name, date of birth, phone number, home address, email address, social security number, and other information that the student submitted to the group mailbox. The College confirmed the members of the group email on about May 25, 2018.

Although there appears to be little or no risk of harm to the impacted individuals, the College started working immediately to notify potentially impacted individuals once it established that risk had been mitigated. Accordingly, the College is offering, among other things, two years of complimentary credit monitoring, and identity protection to all individuals who may have been impacted.

Please see the enclosed notification letter that is being provided to the affected individuals. The notification was mailed on June 15, 2018. If you have questions or need information regarding this incident, please do not hesitate to contact me.

HUSCH BLACKWELL

Regards

A handwritten signature in black ink that reads "Sean Tassi". The signature is written in a cursive style with a large initial 'S' and a distinct 'T'.

Sean Tassi
Partner



C/O ID Experts
10300 SW Greenburg Rd. Suite 570
Portland, OR 97223

«first_name» «last_name»
«address» «address_2»
«city», «state» «zip»

June 15, 2018

Re: Notice of Data Breach

Dear «first_name» «last_name»:

We are writing to share important information about a recent data security incident that may have affected some of your personal information.

What Happened

On July 11, 2017, the College's Information Technology Services (ITS) created a group email to facilitate responsiveness to student inquiries for financial aid support. Personnel necessary to administer financial aid for the College were added as members of the group. Prospective and current students submitted inquiries and documents to the group email. Emails from the prospective and current students should have only been visible to the personnel necessary to administer financial aid for the College.

Between July 11, 2017 and April 23, 2018, a prospective or current student who sent an email to the group email received an email from the group participant. The email from the group participant contained a link to view the group. If a prospective or current student selected the option to view the group, the student could also view information that was submitted by other students. The College became aware of this security risk when we were contacted by a student on April 23, 2018 who had received an email from the group participant and clicked on the link to view the group.

After investigating the matter immediately, ITS determined that the group privacy setting was set to public, which allowed the student to access the group mailbox. ITS staff immediately changed the setting to private and confirmed that no one would be able to join or view the group without being granted access by ITS.

What Information Was Involved

The affected information may have included your name, date of birth, phone number, home address, email address, social security number, and other information that you submitted to the group mailbox.

What We Are Doing

Once we became aware of the security risk, we took immediate steps to change the privacy settings on the group mailbox. Although there appears to be little or no risk of harm to you as a result of this incident, we started working immediately to notify potentially impacted individuals once we established that risk had been mitigated.

Accordingly, to you and others who may have been inconvenienced by this unfortunate event, we are offering two years of complimentary credit monitoring and identity protection. You may sign up for this service by following the instructions included in **Attachment A**.

What You Can Do

Regardless of whether you elect to receive credit monitoring and identity protection services, we recommend that you remain vigilant in regularly reviewing and monitoring all account statements and credit histories to guard against any unauthorized transactions. If any suspicious or unusual activity is discovered, please contact your financial institution or call the number on the back of your payment card. **Attachment B** contains more information about steps you can take to protect against fraud and identity theft.

For More Information

First and foremost, we want to reinforce that keeping the personal data of our prospective and current students is of the utmost importance to us. We can assure you that as soon as we determined that some personal information may have been accessible, we took swift action to address the issue and protect everyone who may have been impacted. We sincerely regret that this incident occurred, and we apologize for any inconvenience that it may have caused.

Sincerely,



Lenny F. Favara Jr., Ph.D (Rev.)
Interim President
Central Christian College of Kansas

ATTACHMENT A

For individuals affected by the recent security risk, the following services are available for 24 months from the date of enrollment:

MyIDcare Identity Protection Services: This service offers single bureau credit monitoring, dark web monitoring, fully managed recovery and \$1 million identity theft insurance. To enroll in this service, you will need to contact IDExperts, our identity protection service provider. You may sign up online at <https://app.myidcare.com/account-creation/protect> or by phone by calling 1-800-939-4170 using the enrollment code «**Enrollment_code**». MyIDCare experts are available Monday through Friday from 6 am - 5 pm Pacific Time.

*Redemption codes can be activated through September 15, 2018.

ATTACHMENT B

Provided below are names and contact information for the three major United States credit reporting agencies and additional information about steps you can take to: obtain a free credit report; to place a fraud alert, credit freeze, or credit lock on your credit report; and to protect your information. If you believe you are a victim of fraud or identity theft you should consider contacting your local law enforcement agency, your state's attorney general, or the Federal Trade Commission.

INFORMATION ON OBTAINING A FREE CREDIT REPORT

Residents of the United States are entitled to one free credit report annually from each of the three major credit reporting agencies. To order your free credit reports, visit www.annualcreditreport.com or call toll-free (877) 322-8228.

INFORMATION ON FRAUD ALERTS, CREDIT FREEZES AND CREDIT LOCKS

To place a fraud alert, credit freeze, or credit lock on your credit report, you must contact one of the three credit reporting agencies below:

Equifax:
Consumer Fraud Division
P.O. Box 740256
Atlanta, GA 30374
1-888-766-0008
www.equifax.com

Experian:
Credit Fraud Center
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion:
TransUnion LLC
P.O. Box 2000
Chester, PA 19022-2000
1-800-680-7289
www.transunion.com

Fraud Alert: To place a fraud alert, contact any of the three major credit reporting agencies listed above and request that a fraud alert be put on your file. The agency that you contacted must notify the other two agencies. A fraud alert is free and lasts 90 days, but can be renewed. A fraud alert indicates to anyone requesting your credit file that you suspect you are a possible victim of fraud. A fraud alert does not affect your ability to get a loan or credit. Instead, it alerts a business that your personal information might have been compromised and requires that business to verify your identity before issuing you credit. Although this may cause some short delay if you are the one applying for the credit, it might protect against someone else obtaining credit in your name.

Credit Freeze: To place a credit freeze, contact the three credit reporting agencies listed above and provide the personal information required by each agency. A credit freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report until the freeze is lifted. When a credit freeze is in place, no one—including you—can open a new account. As a result, please be aware 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. When you place a credit freeze, you will be provided a PIN to lift temporarily or remove the credit freeze. A credit freeze generally lasts until you lift or remove it, although in some jurisdictions it will expire after seven years. The cost to place a credit freeze is typically between \$5.00 and \$10.00 each time you place a freeze, but may vary by jurisdiction. Certain jurisdictions may also permit a credit reporting agency to charge you similar fees to lift or remove the freeze. If you have been a victim of identity theft, and you provide the credit reporting agency with a valid police report, it cannot charge you to place, lift, or remove a credit freeze.

Credit Lock: Like a credit freeze, a credit lock restricts access to your credit report and prevents anyone from opening an account until unlocked. Unlike credit freezes, your credit can typically be unlocked online without delay. To lock your credit, contact all three credit reporting agencies listed above and complete a credit lock agreement. The cost of a credit lock varies by agency, which typically charges monthly fees.

ADDITIONAL STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

Review Your Account Statements: Carefully review your bank, credit card, and other account statements every month to ensure that all of your account activity is valid. Report any questionable charges promptly and in writing to the card or account issuer.

Check Your Credit Report: Check your credit report periodically to ensure that all your information is correct. You can obtain a free credit report once per year by visiting www.annualcreditreport.com or by calling (877) 322-8228. Carefully reviewing your credit report can help you spot problems and address them quickly. If you have any questions about your credit report or notice any inaccuracies, contact the relevant consumer reporting agency promptly at the telephone number listed on the report.

Contact the Office of the State Attorney General: You may contact the Office of the State Attorney General at the contact information found in Attachment C.

Consult the Federal Trade Commission: You may also contact the United States Federal Trade Commission ("FTC") for further information on fraud alerts, credit freezes, credit locks, and how to protect yourself from identity theft. The FTC can be contacted at 400 7th St. SW, Washington, DC 20024; telephone 1-877-382-4357; or www.consumer.gov/idtheft.

ATTACHMENT C

State Attorneys General Contact List

Alabama

501 Washington Avenue
P.O. Box 300152
Montgomery, AL 36130-0152
(334) 242-7300
<http://www.ago.state.al.us/>

Alaska

1031 W. 4th Avenue, Suite 200
Anchorage, AK 99501-1994
(907) 269-5602
<http://www.law.state.ak.us/index.html>

Arizona

1275 W. Washington Street
Phoenix, AZ 85007
(602) 542-4266
<http://www.azag.gov/>

Arkansas

323 Center St., Suite 200
Little Rock, AR 72201-2610
(800) 482-8982
<http://www.ag.arkansas.gov/>

California

1300 I St., Suite 1740
Sacramento, CA 95814
(916) 445-9555
<http://ag.ca.gov/>

Colorado

1300 Broadway, 10th Floor
Denver, CO 80203
(720) 508-6000
<http://www.coloradoattorneygeneral.gov/>

Connecticut

55 Elm Street
Hartford, CT 06106
(860) 808-5318
<http://www.ct.gov/ag/>

Delaware

820 N. French Street
Wilmington, DE 19801
(302) 577-8400
<http://attorneygeneral.delaware.gov/>

Florida

The Capitol, PL 01
Tallahassee, FL 32399-1050
(850) 414-3300
<http://myfloridalegal.com/>

Georgia

40 Capitol Square, SW
Atlanta, GA 30334-1300
(404) 656-3300
<http://law.ga.gov/>

Hawaii

425 Queen Street
Honolulu, HI 96813
(808) 586-1500
<http://ag.hawaii.gov/>

Idaho

700 W. Jefferson Street, Suite 210
P.O. Box 83720
Boise, ID 83720-1000
(208) 334-2400
<http://www.ag.idaho.gov/>

Illinois

100 W. Randolph Street
Chicago, IL 60601
(312) 814-3000
<http://illinoisattorneygeneral.gov/>

Indiana

302 West Washington Street, 5th
Floor
Indianapolis, IN 46204
(317) 232-6201
<http://www.in.gov/attorneygeneral/>

Iowa

1305 E. Walnut
Des Moines, IA 50319
(515) 281-5164
<http://www.iowaattorneygeneral.gov>

Kansas

120 S.W. 10th Avenue, 2nd Floor
Topeka, KS 66612-1597
(785) 296-2215
<https://www.ag.ks.gov/>

Kentucky

700 Capitol Avenue, Suite 118
Frankfort, KY 40601
(502) 696-5300
<http://ag.ky.gov/>

Louisiana

P.O. Box 94095
Baton Rouge, LA 70804-4095
(225) 326-6000
<http://www.ag.state.la.us/>

Maine

State House Station 6
Augusta, ME 04333
(207) 626-8800
<http://www.maine.gov/ag/>

Maryland

200 St. Paul Place
Baltimore, MD 21202-2202
(410) 576-6300
<http://www.marylandattorneygeneral.gov/>

Massachusetts

1 Ashburton Place
Boston, MA 02108-1698
(617) 727-2200
<https://www.mass.gov/orgs/office-of-attorney-general-maura-healey>

Michigan

P.O. Box 30212
525 W. Ottawa Street
Lansing, MI 48909-0212
(517) 373-1110
<http://www.michigan.gov/ag>

Minnesota

75 Dr. Martin Luther King, Jr.
Boulevard, Suite 102
Saint Paul, MN 55155
(651) 296-3353 or 1-800-657-3787 |
TTY: (651) 297-7206 or 1-800-366-4812
<http://www.ag.state.mn.us/>

Mississippi
Department of Justice
P.O. Box 220
Jackson, MS 39205
(601) 359-3680
<http://www.ago.state.ms.us/>

Missouri
207 W. High Street
Jefferson City, MO 65101
(573) 751-3321
<http://ago.mo.gov/>

Montana
215 N. Sanders
Helena, MT 59620-1401
(406) 444-2026
<https://doj.mt.gov/>

Nebraska
State Capitol
P.O. Box 98920
Lincoln, NE 68509-8920
(402) 471-2682
<http://www.ago.ne.gov/>

Nevada
100 N. Carson Street
Carson City, NV 89701
(775) 684-1100
<http://ag.nv.gov/>

New Hampshire
33 Capitol Street
Concord, NH 03301
(603) 271-3658
<https://www.doj.nh.gov/index.htm>

New Jersey
25 Market Street
P.O. Box 080
Trenton, NJ 08625
(609) 292-8740
<http://nj.gov/oag/newsreleases18/pr20180116a.html>

New Mexico
P.O. Drawer 1508
Santa Fe, NM 87504-1508
(505) 490-4060
<https://www.nmag.gov/>

New York
The Capitol, 2nd Floor
Albany, NY 12224
(518) 474-7330
<http://www.ag.ny.gov/>

North Carolina
P.O. Box 629
Raleigh, NC 27602-0629
(919) 716-6400
<http://www.ncdoj.gov/>

North Dakota
600 E. Boulevard Avenue
Bismarck, ND 58505-0040
(701) 328-2210
<http://www.ag.state.nd.us>

Ohio
30 E. Broad Street
Columbus, OH 43266-0410
(614) 466-4320
<http://www.ohioattorneygeneral.gov/>

Oklahoma
313 NE 21st Street
Oklahoma City, OK 73105
(405) 521-3921
<http://www.oag.state.ok.us/>

Oregon
1162 Court Street, NE
Salem, OR 97301
(503) 378-6002
<http://www.doj.state.or.us/>

Pennsylvania
Strawberry Square, 16th Floor
Harrisburg, PA 17120
(717) 787-3391
<https://www.attorneygeneral.gov/>

South Carolina
Rembert C. Dennis Office Building
P.O. Box 11549
Columbia, SC 29211-1549
(803) 734-3970
<http://www.scag.gov/>

Tennessee
425 5th Avenue North
Nashville, TN 37243
(615) 741-3491
<http://www.tn.gov/attorneygeneral>

Texas
Capitol Station
P.O. Box 12548
Austin, TX 78711-2548
(512) 463-2100
<https://www.texasattorneygeneral.gov/>

Utah
State Capitol, Room 236
Salt Lake City, UT 84114-0810
(801) 538-9600
<http://attorneygeneral.utah.gov/>

Virginia
202 North Ninth Street
Richmond, VA 23219
(804) 786-2071
<http://www.oag.state.va.us/>

Washington
1125 Washington Street SE
P.O. Box 40100
Olympia, WA 98504-0100
(360) 753-6200
<http://www.atg.wa.gov>

West Virginia
1900 Kanawha Boulevard, E
Charleston, WV 25305
(304) 558-2021
<http://www.wvago.gov/>

Wisconsin
State Capitol, Room 114 East
P. O. Box 7857
Madison, WI 53707-7857
(608) 266-1221
<http://www.doj.state.wi.us>

Wyoming
State Capitol Building
Cheyenne, WY 82002
(307) 777-7841
<http://attorneygeneral.state.wy>