



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

NOV 29 2021

CONSUMER PROTECTION

Amanda Harvey
Office: (267) 930-1697
Fax: (267) 930-4771
Email: aharvey@mullen.law

1452 Hughes Road, Suite 200
Grapevine, TX 76051

November 23, 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 College Solutions located at 2400 Old Brick Road, Glen Allen, VA 23060, 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. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, College Solutions 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 or about August 9, 2021, College Solutions discovered suspicious activity involving certain employee email accounts and initiated an investigation. As part of the investigation, it was determined that certain employee email accounts were accessed without authorization between July 28, 2021 to August 9, 2021. The investigation could not confirm what specific information within these accounts may have been accessed by the unauthorized individual. Therefore, in an abundance of caution, College Solutions undertook a diligent and comprehensive review of the entire contents of the impacted email accounts to determine the information present in these accounts and potentially subject to unauthorized access. On or around October 28, 2021, the full scope of this comprehensive review was completed, and College Solutions confirmed that certain information related to certain individuals may have been impacted.

The information that could have been subject to unauthorized access includes name, address, and Social Security number.

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Notice to New Hampshire Resident

On or about November 23, 2021, College Solutions 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, College Solutions moved quickly to investigate and respond to the incident, assess the security of College Solutions systems, and notify potentially affected individuals. College Solutions is also working to implement additional safeguards and training to its employees. College Solutions 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, College Solutions 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. College Solutions 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/eks
Enclosure

EXHIBIT A



Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<MailID>>
<<Name 1>>
<<Name 1>>
<<Address 1>>
<<Address 2>>
<<City>>, <<State>> <<Zip>>
<<Country>>

<<Date>>

NOTICE OF <<Variable Header>>

Dear <<Name 1>>:

College Solutions is writing to notify you of a recent incident that may affect the privacy of some of your information. Although College Solutions is currently unaware of any misuse of your information, we are nonetheless providing you with details about the incident, our response, and steps you may take to better protect against misuse of your information, should you feel it appropriate to do so.

What Happened? On or about August 9, 2021, College Solutions discovered suspicious activity involving certain employee email accounts and initiated an investigation. As part of the investigation, it was determined that certain employee email accounts were accessed without authorization between July 28, 2021 to August 9, 2021. The investigation could not confirm what specific information within these accounts may have been accessed by the unauthorized individual. Therefore, in an abundance of caution, College Solutions undertook a diligent and comprehensive review of the entire contents of the impacted email accounts to determine the information present in these accounts and potentially subject to unauthorized access. On or around October 28, 2021, the full scope of this comprehensive review was completed, and College Solutions confirmed that certain information related to you was present in the relevant accounts at the time of the incident, and thus potentially accessible.

What Information Was Involved? The information that may have been impacted by this incident includes your <<Data Elements>> and name. To date, we have no indication that your information has been subject to actual or attempted misuse as a result of this incident.

What We Are Doing. Data privacy and security are among College Solutions highest priorities, and there are extensive measures in place to protect information in our care. Upon discovery, we promptly commenced an investigation with the assistance of third-party cyber security specialists to confirm the nature and scope of this incident. College Solutions is providing notice of this incident to impacted individuals and pertinent state and/or federal regulators. As part of our ongoing commitment to the security of information, all policies and procedures are being reviewed and enhanced where possible, additional safeguards are being implemented, and workforce training is being conducted to reduce the likelihood of a similar event in the future.

As an added precaution, we are also offering <<length>> of complimentary access to credit monitoring services through Equifax. Individuals who wish to receive these services must enroll by following the attached enrollment instructions.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, explanation of benefits, and credit reports for suspicious activity. You may also review the information contained in the attached *Steps You Can Take to Help Protect Personal Information*. We encourage you to enroll to receive the complimentary credit monitoring services being provided by College Solutions. We will cover the cost of these services; however, you will need to enroll yourself as we are unable to do so on your behalf.

For More Information. We understand you may have questions about this incident that are not addressed in this letter. If you have additional questions, or need assistance, please call 855-604-1649, Monday through Friday 9:00AM – 9:00PM Eastern Time, excluding U.S. holidays. You can also write to us at 2400 Old Brick Road, Glen Allen, VA 23060.

College Solutions sincerely regrets any inconvenience or concern this incident has caused.

Sincerely,

Margaret Baudinet
Chief Executive Officer
College Solutions

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Credit Monitoring

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.

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 one-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 credit 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.

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. College Solutions is located at 2400 Old Brick Road, Glen Allen, VA 23060.

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 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 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 2 Rhode Island residents impacted by this incident.