

April 5, 2019

VIA FIRST CLASS MAIL and FACSIMILE (603-271-2110)

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

RECEIVED
APR 08 2019
CONSUMER PROTECTION

Re: Notice of Data Security Incident

To Whom It May Concern:

My firm represents Community College of Allegheny County ("CCAC"). I write to inform you of an incident involving a breach of personal information.

CCAC received a request for information under Pennsylvania's Right to Know Law, which requires that certain records maintained by governmental agencies such as CCAC be provided to members of the public upon request. On March 27, 2019, CCAC responded to a Right to Know Law request it received for certain records relating to former students by providing data to the requester in the form of spreadsheets. All personally identifiable information relating to CCAC's former students was redacted from the spreadsheets before the information was provided to the requester. Unfortunately, due to technical failures in the redaction process, the redacted information was capable of being unmasked and some of the former students' personally identifiable information became visible to the individual who submitted the request.

CCAC immediately took action to secure the return of the information from that individual and to prevent any further disclosures. Although it is not clear that all of the personally identifiable information on the spreadsheets was unmasked and viewed, out of an abundance of caution, CCAC will notify all potentially affected individuals so that they may take measures to protect themselves from any possible misuse of the information.

The unauthorized person may have viewed documents that contain the individual's first and last name, CCAC student identification number, Social Security Number, and amounts due to CCAC for unpaid fees and charges.

As stated above, it is not clear that all of the personally identifiable information on the spreadsheets was unmasked and viewed. Regardless, out of an abundance of caution, CCAC promptly notified local law enforcement authorities of the incident. CCAC is reviewing its procedures and technology, and will provide employee training and implement additional

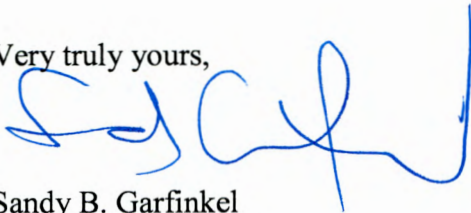
protocols concerning the handling and disclosure of student information and the utilization of redaction tools and methods.

CCAC is also offering affected individuals one year of identity protection services at no charge.

Based upon its investigation, CCAC will provide direct notification by letter to one (1) affected individual that is known to reside in New Hampshire via US Mail on or about April 5, 2019. A copy of the notice to be sent to the New Hampshire resident is attached hereto.

If you have any further questions about the incident, do not hesitate to contact me.

Very truly yours,



Sandy B. Garfinkel

SBG/kp

Enclosure

Community College of Allegheny County
Mail Handling Services
777 E Park Dr
Harrisburg, PA 17111



April 5, 2019

[Redacted]
[Redacted]
[Redacted]

A-3217

NOTICE OF DATA SECURITY INCIDENT

Dear [Redacted]:

Community College of Allegheny County (“CCAC”) is writing to inform you of an incident 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 better protect against the possibility of misuse of your personal information, should you feel it appropriate to do so.

The privacy and protection of our students’ and former students’ information is a matter we take very seriously. We apologize for any concern or inconvenience that may be caused by this incident and we recommend that you closely review this letter for steps that you may take to further protect yourself against any potential misuse of your information

What Happened

CCAC received a request for information under Pennsylvania’s Right to Know Law, which requires that certain records maintained by governmental agencies such as CCAC be provided to members of the public upon request. On March 27, 2019, CCAC responded to a Right to Know Law request it received for certain records relating to former students by providing data to the requester in the form of spreadsheets. All personally identifiable information relating to CCAC’s former students was redacted from the spreadsheets before the information was provided to the requester. Unfortunately, due to technical failures in the redaction process, the redacted information was capable of being unmasked and some of the former students’ personally identifiable information became visible to the individual who submitted the request.

CCAC immediately took action to secure the return of the information from that individual and to prevent any further disclosures. Although it is not clear that all of the personally identifiable information on the spreadsheets was unmasked and viewed, out of an abundance of caution, CCAC is notifying all potentially affected individuals so that they may take measures to protect themselves from any possible misuse of the information.

What Information Was Involved

The unauthorized person may have viewed documents that contain the first and last name, either a CCAC student identification number or a Social Security Number, and amounts due to CCAC for unpaid fees and charges.

What We Are Doing

As stated above, it is not clear that all of the personally identifiable information on the spreadsheets was unmasked and viewed. Regardless, out of an abundance of caution, CCAC promptly notified local law enforcement authorities of the incident. CCAC is reviewing its procedures and technology, and will provide employee training and implement additional protocols concerning the handling and disclosure of student information and the utilization of redaction tools and methods.

Out of an abundance of caution, we are offering a complimentary one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in the pages attached to this letter.

What You Can Do

You should remain vigilant for incidents of fraud and identity theft by regularly reviewing your account statements and monitoring free credit reports for any unauthorized activity. If you discover any suspicious or unusual activity on your accounts, be sure to report it immediately to your financial institutions, as major credit card companies have rules that restrict them from requiring you to pay for fraudulent charges if they are reported in a timely fashion.

For More Information

We understand that you may have questions about this incident that are not addressed in this letter. We have established a confidential, toll-free hotline to assist you with questions regarding this incident, the free services we are making available, and steps you can take to protect yourself against identity theft and fraud. We apologize for any inconvenience caused by this incident. If you have any questions regarding this incident or if you desire further information or assistance, please call our call center at 1-833-444-4458 between 8am-5pm Eastern Time, Monday-Friday.

Sincerely,



Joyce Breckenridge, Vice President of Finance
Community College of Allegheny County

ADDITIONAL RESOURCES

Contact information for the three nationwide credit reporting agencies is:

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111

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

TransUnion, PO Box 2000, Chester, PA 19022, www.transunion.com, 1-800-888-4213

Free Credit Report. It is recommended that you remain vigilant for incidents of fraud and identity theft by reviewing 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.

To order your annual free credit report please visit www.annualcreditreport.com or call toll free at **1-877-322-8228**.

You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available 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.

For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents: 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 such additional report(s).

Fraud Alert. You may place a fraud alert in your file by calling one of the three nationwide credit reporting agencies above. A fraud alert tells creditors to follow certain procedures, including contacting you before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit.

Security Freeze. You have the ability to place a security freeze on your credit report.

A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent. To place a security freeze on your credit report, you may be able to use an online process, an automated telephone line, or a written request to any of the three credit reporting agencies listed above. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue.

Federal Trade Commission and State Attorneys General Offices. 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).

California Residents: Visit the California Office of Privacy Protection (<http://www.ca.gov/Privacy>) for additional information on protection against identity theft.

Kentucky Residents: Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, www.ag.ky.gov, Telephone: 1-502-696-5300.

Maryland Residents: Office of the Attorney General of Maryland, Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023.

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 a 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. You can 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.

North Carolina Residents: Office of the Attorney General of North Carolina, 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 1-919-716-6400.

Oregon Residents: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392

Rhode Island Residents: Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, Telephone: 401-274-4400

INSTRUCTIONS FOR ENROLLMENT IN EXPERIAN IDENTITYWORKS CREDIT 3B

To help protect your identity, we are offering a **complimentary** one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: **July 12, 2019** (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: [<https://www.experianidworks.com/3bcredit>]
3. PROVIDE the **Activation Code: 8NXSYSPK3**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-288-8057. Be prepared to provide engagement number **DB11767** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **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.
- **Experian IdentityWorks ExtendCARETM:** 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.

Activate your membership today at [<https://www.experianidworks.com/3bcredit>]
or call 877-288-8057 to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8057.

* 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.