



150 N. Riverside Plaza, Suite 3000, Chicago, IL 60606 • (312) 819-1900

June 23, 2020

Bruce A. Radke
(312) 463-6211
(312) 819-1910 Direct Fax
bradke@polsinelli.com

VIA E-MAIL (ATTORNEYGENERAL@DOJ.NH.GOV)
AND FEDERAL EXPRESS

Attorney General Gordon J. MacDonald
Office of the Attorney General
Attn: Security Incident Notification
33 Capitol Street
Concord, NH 03301

**Re: Notification of a Computer Security Incident Involving Personal
Information Pursuant to N.H. Rev. Stat. § 359-C:20**

Dear Attorney General MacDonald:

We represent Eagle Community Credit Union (“Eagle Credit”), a California-chartered credit union, in connection with an incident that involved the personal information of three (3) New Hampshire residents, and provide this notice on behalf of Eagle Credit pursuant to N.H. Rev. Stat. § 359-C:20(I)(b). This notice will be supplemented, if necessary, with any new significant facts discovered subsequent to its submission. While Eagle Credit is notifying you of this incident, Eagle Credit does not waive any rights or defenses relating to the incident or this notice, or the applicability of New Hampshire law on personal jurisdiction.

NATURE OF THE SECURITY INCIDENT OR UNAUTHORIZED ACCESS

Eagle Credit recently learned that an unauthorized third party illegally accessed one of its employee’s email account on February 24, 2020. Upon learning of the incident, Eagle Credit promptly secured the email account to prevent further access. Eagle Credit is not aware of any fraud or identity theft to any individual as a result of this incident. Nevertheless, because there was an email account that may have been accessed and Eagle Credit cannot confirm exactly what, if any, information may have been obtained by the third party, Eagle Credit searched the impacted account to determine if it contained any personal information. Eagle Credit determined that the email account contained certain personal information, including, depending on the individual, the individual’s name, address, date of birth, Social Security number, credit or debit card number with access code, and/or financial account information.

polsinelli.com

Atlanta Boston Chicago Dallas Denver Houston Kansas City Los Angeles Nashville New York Phoenix
St. Louis San Francisco Washington, D.C. Wilmington
Polsinelli PC, Polsinelli LLP in California

June 23, 2020

Page 2

NUMBER OF NEW HAMPSHIRE RESIDENTS AFFECTED

On April 22, 2020, Eagle Credit confirmed that the incident may have impacted three (3) New Hampshire residents. Eagle Credit is notifying the impacted resident of the situation by letter today, June 23, 2020, via first-class, United States mail. The notification letter includes an offer for one (1) year of complimentary credit monitoring and identity theft protection for those individuals with drivers' license numbers, state identification numbers, and/or Social Security numbers impacted. Enclosed is sample of the notice letter that is being sent to the impacted individuals.

STEPS TAKEN RELATING TO THE INCIDENT

Upon learning of the incident, Eagle Credit promptly contained the incident by securing the email accounts to prevent further access. It also engaged a forensic security firm to investigate and confirm the security of its email and computer systems. Eagle Credit is undertaking efforts to reduce the risk of a similar incident occurring in the future, including retraining all employees and implementing new policies and procedures related to retention of data in email accounts.

CONTACT INFORMATION

Please contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,



Bruce A. Radke

Enclosure



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

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country >>

Dear <<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>,

NOTICE OF DATA BREACH	
What Happened	<p>Eagle Community Credit Union (“Eagle CCU”) is committed to the privacy of individuals and takes the protection of personal information that is entrusted to us seriously. This commitment extends to notifying individuals when their personal information may be at risk. Although we have no reason to believe that your information has been used to commit fraud or identity theft, we are writing to make you aware of a recent data security incident that may have involved some of your personal information. We recently discovered that, on February 24, 2020, someone outside of Eagle CCU temporarily accessed an Eagle CCU’s employee email account without authorization.</p> <p>Upon learning of the situation, we promptly contained the incident the morning of February 24, 2020 by securing the employee email account to prevent further access and began an initial internal investigation into the incident. We also hired a leading forensic security firm to further investigate the incident and confirm the security of our computer systems and network. The security firm’s investigation showed no internal wrongdoing and verified Eagle CCU computer systems and network are secure.</p> <p>On April 22, 2020, our investigation determined that the email account contained some of your personal information. At this point, we do not believe that the unauthorized third party’s motivation was to access the personal information contained in the email account and have no indication that any such information has been used for fraud or identity theft purposes. Nonetheless, we are providing you with this notice because your personal information was contained in the relevant account. We are also committed to taking steps to help prevent something like this from happening again, including reviewing our technical controls and increased security training for all staff members.</p>
What We Are Doing	<p>Although we are not aware of any instances of fraud or identity theft, 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 this letter.</p>
What Information Was Involved	<p>As part of our investigation, we searched for any personal information that could have been viewed. The impacted information contained in the relevant email account varied by individual but may have included your name, financial account information, and/or your Social Security number.</p>

<p>What You Can Do</p>	<p>As a precautionary measure, we recommend you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").</p>						
<p>Other Important Information</p>	<p>You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps to you can take to avoid identity theft. For more information and to contact the FTC, please visit www.ftc.gov/idtheft or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at: Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.</p> <p>Credit Reports: You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting www.annualcreditreport.com, by calling toll free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print a copy of the request form at https://www.annualcreditreport.com/cra/requestformfinal.pdf.</p> <p>Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is as follows:</p> <table border="0" data-bbox="341 840 1380 1008"> <tr> <td>Equifax 1-866-349-5191 www.equifax.com P.O. Box 740421 Atlanta, GA 30374</td> <td>Experian 1-888-397-3742 www.experian.com P.O. Box 9554 Allen, TX 75013</td> <td>TransUnion 1-800-888-4213 www.transunion.com P.O. Box 1000 Chester, PA 19016</td> </tr> </table> <p>Fraud Alerts: You may want to consider placing a fraud alert on your credit report. A fraud alert is free and will stay on your credit report for one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at http://www.annualcreditreport.com.</p> <p>Credit and Security Freezes: You may have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:</p> <table border="0" data-bbox="341 1596 1461 1774"> <tr> <td>Equifax Security Freeze 1-888-298-0045 www.equifax.com P.O. Box 105788 Atlanta, GA 30348</td> <td>Experian Security Freeze 1-888-397-3742 www.experian.com P.O. Box 9554 Allen, TX 75013</td> <td>TransUnion Security Freeze 1-888-909-8872 www.transunion.com P.O. Box 160 Woodlyn, PA 19094</td> </tr> </table> <p>Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting www.consumerfinance.gov/ff/201504_cfpb_summary_your-rights-under-fcra.pdf, or by requesting information in writing from the Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. NW, Washington, DC 20580.</p>	Equifax 1-866-349-5191 www.equifax.com P.O. Box 740421 Atlanta, GA 30374	Experian 1-888-397-3742 www.experian.com P.O. Box 9554 Allen, TX 75013	TransUnion 1-800-888-4213 www.transunion.com P.O. Box 1000 Chester, PA 19016	Equifax Security Freeze 1-888-298-0045 www.equifax.com P.O. Box 105788 Atlanta, GA 30348	Experian Security Freeze 1-888-397-3742 www.experian.com P.O. Box 9554 Allen, TX 75013	TransUnion Security Freeze 1-888-909-8872 www.transunion.com P.O. Box 160 Woodlyn, PA 19094
Equifax 1-866-349-5191 www.equifax.com P.O. Box 740421 Atlanta, GA 30374	Experian 1-888-397-3742 www.experian.com P.O. Box 9554 Allen, TX 75013	TransUnion 1-800-888-4213 www.transunion.com P.O. Box 1000 Chester, PA 19016					
Equifax Security Freeze 1-888-298-0045 www.equifax.com P.O. Box 105788 Atlanta, GA 30348	Experian Security Freeze 1-888-397-3742 www.experian.com P.O. Box 9554 Allen, TX 75013	TransUnion Security Freeze 1-888-909-8872 www.transunion.com P.O. Box 160 Woodlyn, PA 19094					

Other Important Information	<p>For residents of Iowa: Iowa residents can contact the Office of the Attorney general to obtain information about steps to take to avoid identity theft from the Iowa Attorney General's office at: Office of the Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines IA 50319, 515-281-5164.</p> <p>For residents of Maryland: Maryland residents can contact the Office of the Attorney General to obtain information about steps one can take to avoid identity theft from the Maryland Attorney General's office at: Office of the Attorney General, 200 St. Paul Place, Baltimore, MD 21202, (888) 743-0023, www.oag.state.md.us</p> <p>For residents of Rhode Island: We believe that this incident affected xxx Rhode Island residents. Rhode Island residents can contact the Office of the Attorney general at: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, (401) 274-4400, www.riag.ri.gov. An individual has the right to obtain any police report filed in regard to this incident. If one is the victim of identity theft, they also have the right to file a police report and obtain a copy of it.</p> <p>For residents of North Carolina: North Carolina residents can obtain information about preventing identity theft from the North Carolina Attorney General's Office at: North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001; 877-5-NO-SCAM (Toll-free within North Carolina); 919-716-6000; www.ncdoj.gov.</p> <p>New York State Residents: New York residents can obtain information about preventing identity theft from the New York Attorney General's Office at: Office of the Attorney General for the State of New York, Bureau of Consumer Frauds & Protection, The Capitol, Albany, New York 12224-0341; https://ag.ny.gov/consumer-frauds/identity-theft; (800) 771-7755.</p> <p>This notification was not delayed as a result of a law enforcement investigation.</p>
For More Information	For further information and assistance, please call 1-800-771-7755 from 8:00 a.m. to 5:30 p.m. CST, Monday through Friday.

We apologize for any inconvenience or concern this incident might cause. We value the trust you place in us and take our responsibility to safeguard your personal information seriously.

Sincerely,



Scott Rains
 CEO/President
 Eagle Community Credit Union

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: <<b2b_text_1(EnrollmentDeadline)>> (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: <<Member ID>>**

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 <<b2b_text_2(EngagementNumber)>> as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-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.