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CONSUMER PROTECTION

MULLEN COUGHLIN LLC
ATTORNEYS AT LAW

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

May 15, 2023

**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**

To Whom It May Concern:

We represent Edmonds School District ("Edmonds") located at 20420 68th Ave. W, Lynnwood, WA 98036, and are writing to notify your office of an incident that may affect the security of certain 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, Edmonds 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 January 31, 2023, Edmonds identified suspicious activity in its environment and immediately launched an investigation to determine the nature and scope of the activity. The investigation, which was conducted with the assistance of third-party forensic specialists, determined that an unauthorized actor had the ability to view and acquire certain information stored on the network between January 16, 2023, and January 31, 2023. Therefore, Edmonds is undertaking a comprehensive review of the data at risk to assess if any sensitive information could be affected and to whom it relates. This review is still ongoing, but on April 26, 2023, Edmonds identified that the information of certain current and former employees could have been subject to unauthorized access. The information that could have been subject to unauthorized access includes

**Notice to New Hampshire Resident**

On May 15, 2023, Edmonds began providing written notice of this incident to one (1) New Hampshire resident. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***. Previously on February 10, 2023, Edmonds provided substitute notice of this incident by posting a notice of the event on the homepage of its website and by publishing a media notice throughout the state of Washington. A copy of the website notice is attached here as ***Exhibit B*** and the media notice is attached here as ***Exhibit C***.

**Other Steps Taken and To Be Taken**

Upon discovering the event, Edmonds moved quickly to investigate and respond to the incident, assess the security of its systems, and identify potentially affected individuals. Edmonds is providing individuals whose personal information was potentially affected by this incident access to credit monitoring services for twelve (12) months through IDX at no cost to the individuals.

Additionally, Edmonds is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Edmonds is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, 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. Edmonds is also providing written notice of this incident to state and federal regulators, as necessary.

**Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at .

Very truly yours,

Colin D. Scanlon of
MULLEN COUGHLIN LLC

CDS/scs
Enclosure

# EXHIBIT A

Edmonds School District
Return Mail to IDX
4145 SW Watson Ave, Suite 400
Beaverton, OR 97005

Edmonds School District

To Enroll, Please Call:
1-800-939-4170
Or Visit:
https://app.idx.us/account-creation/protect
Enrollment Code: <<XXXXXXXX>>

<<First Name>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip>>

May 15, 2023

**NOTICE OF DATA PRIVACY EVENT**

Dear <<First Name>> <<Last Name>>:

Edmonds School District ("Edmonds") writes to notify you of an incident that may affect the privacy of some of your information. This letter provides details of the incident, our response, and steps you may take to better protect against the possible misuse of your information should you feel it is appropriate to do so.

**What Happened?** On January 31, 2023, Edmonds identified suspicious activity in its environment and immediately launched an investigation to determine the nature and scope of the activity. The investigation, which was conducted with the assistance of third-party forensic specialists, determined that an unauthorized actor had the ability to view and acquire certain information stored on our network between January 16, 2023, and January 31, 2023. Therefore, Edmonds is undertaking a comprehensive review of the data at risk to assess if any sensitive information could be affected and to whom it relates. While this review is still ongoing, Edmonds has determined that some of your data may be at risk and wanted to inform you as soon as possible. If additional information not listed in this letter is determined to be affected, you will receive a supplemental correspondence to confirm the same.

**What Information Was Involved?** We determined the type of information potentially impacted by this incident may include your:

**What We Are Doing.** We take the confidentiality, privacy, and security of information in our care seriously. Upon discovery of the incident, we immediately commenced an investigation and took steps to implement additional safeguards related to data privacy and security.

In an abundance of caution, we are providing you with access to twelve (12) months of credit monitoring and identity protection services through IDX at no cost to you. A description of the services and instructions on how to enroll can be found within the enclosed *Steps You Can Take to Protect Personal Information*. Please note that you must complete the enrollment process yourself as we are not permitted to enroll you in these services.

**What You Can Do.** You can review the enclosed *Steps You Can Take to Protect Personal Information* for general guidance. In addition, you can enroll in the complimentary credit monitoring and identity protection services being offered through IDX. We also encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity.

**For More Information.** We understand you may have questions about the incident that are not addressed in this letter. If you have questions, or need assistance, please call 1-800-939-4170, Monday through Friday from 6:00 a.m. to 6:00 p.m. Pacific Time. You may also write to Edmonds at 20420 68th Ave. W, Lynnwood, WA 98036.

Sincerely,

Dr. Rebecca Miner
Superintendent
Edmonds School District

## STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

**Enroll in Credit Monitoring and Identity Protection**

1. Website and Enrollment. Go to https://app.idx.us/account-creation/protect and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Please note the deadline to enroll is August 15, 2023.

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

**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 |
| 1-888-298-0045 | 1-888-397-3742 | 1-800-916-8800 |
| 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 marylandattorneygeneral.gov

*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.

# EXHIBIT B

# Notice of Data Event (https://www.edmonds.wednet.edu/news/details/~board/district-2022-23-only-district/post/notice-of-data-event)

Feb 10 2023 2:00 PM

Edmonds School District ("Edmonds") recently discovered an incident that may have impacted the privacy of information related to certain students, staff and parents. While Edmonds is unaware of any actual or attempted misuse of information in relation to the incident, it is providing potentially affected individuals with information about the incident and steps individuals may take to help protect against the possible misuse of your information.

***What Happened?*** On January 31, 2023, Edmonds identified suspicious activity in its environment and immediately launched an investigation to determine the nature and scope of the activity. The investigation, which is still ongoing and being conducted with the assistance of third-party forensic specialists, determined that an unauthorized actor had the ability to view and acquire certain information stored on the network between January 16, 2023, and January 31, 2023. Therefore, Edmonds is undertaking a comprehensive review of the data at risk to assess if any sensitive information could be affected and to whom it relates. While this review is still ongoing, Edmonds wanted to inform potentially affected individuals as soon as possible so that they could take affirmative steps to protect their information should they deem it appropriate to do so.

***What Information Was Involved?***

***How Will Individuals Know If They Are Affected By This Incident?*** Edmonds is in the process of reviewing the data determined to be at risk and generating a list of potentially impacted individuals. Once this review is complete, Edmonds plans to mail notification letters to individuals whose protected information could have been impacted and for whom they have a valid mailing address.

***What You Can Do.*** Edmonds encourages individuals to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your credit reports for any unauthorized or suspicious activity. You can also review the "Steps Individuals Can Take to Help Protect Personal Information" below for further guidance.

***For More Information.*** Edmonds understands individuals may have questions about the incident that are not addressed in this notice. If you have questions, or need assistance, please call , Monday through Friday from 8:00 a.m. to 4:30 p.m. Pacific Time. If you call outside the hours listed, please leave a message and someone will return your call as soon as possible. You may also write to Edmonds at 20420 68th Ave. W, Lynnwood, WA 98036.

**STEPS INDIVIDUALS CAN TAKE TO HELP PROTECT PERSONAL INFORMATION**

***Monitor Your Accounts***

Under U.S. law, a consumer is entitled to one (1) free credit report annually from each of the three (3) major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com (http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. You may also directly contact the three (3) 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 (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 (7) years. Should you wish to place a fraud alert, please contact any one of the three (3) 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 (2) to five (5) 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, military identification, 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 fraud alert or credit freeze, please contact the three (3) major credit reporting bureaus listed below:

| **Equifax** |
| --- |
| https://www.equifax.com/personal/credit-report-services/ (https://www.equifax.com/personal/credit-report-services/) |
| 1-888-298-0045 |
| Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069 |
| Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788 |

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| Experian |
| --- |
| https://www.experian.com/help/ (https://www.experian.com/help/) |
| 1-888-397-3742 |
| Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013 |
| Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013 |
| **TransUnion** |
| https://www.transunion.com/credit-help (https://www.transunion.com/credit-help) |
| 1-800-916-8800 |
| TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016 |
| 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 (http://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.

# EXHIBIT C

*EDMONDS SCHOOL DISTRICT PROVIDES NOTICE OF DATA EVENT – LYNNWOOD, WA.*

Edmonds School District ("Edmonds") recently discovered an incident that may have impacted the privacy of information related to certain students, staff, and parents. While Edmonds is unaware of any actual or attempted misuse of information in relation to the incident, it is providing potentially affected individuals with information about the incident and steps individuals may take to help protect their information should they feel it is appropriate to do so.

On January 31, 2023, Edmonds became aware of suspicious activity related to certain Edmonds computer systems. Edmonds immediately launched an investigation, with the assistance of third-party forensic specialists, to determine the nature and scope of the activity. Through the investigation, it was determined that there was unauthorized access to Edmonds's network between January 16, 2023, and January 31, 2023, and the unauthorized actor had the ability to acquire certain information stored on the network during the period of access. Therefore, Edmonds is undertaking a comprehensive review of the data at risk to assess if any sensitive information could be affected and to whom it relates. While this review is still ongoing, Edmonds wanted to inform potentially affected individuals as soon as possible so that they could take affirmative steps to protect their information should they deem it appropriate to do so. Edmonds determined the type of information potentially impacted by this incident may include, but is not limited to, name, Social Security number, driver's license number, date of birth, student identification number, financial account information, medical information, and student records.

Once Edmonds's review is complete, it intends to mail notice letters to individuals whose protected information could have been affected and for whom it has valid mailing addresses. Interested individuals can find additional information about the event at Edmonds.wednet.edu. They may also write to Edmonds at 20420 68th Ave W, Lynnwood, WA 98036.

Edmonds takes the security of information in its care very seriously. Upon learning of this issue, Edmonds immediately took steps to secure its network by disabling internet access, deploying additional protections across its network, and conducting a diligent investigation to confirm the nature and scope of the incident. Edmonds is also working with third-party specialists to strengthen the security of its systems.

February 10, 2023