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APR 12 2021

CONSUMER PROTECTION

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April 9, 2021

VIA OVERNIGHT MAIL

Attorney General Gordon MacDonald
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Incident Notification

Dear Attorney General MacDonald:

We are writing on behalf of our client, Hobart and William Smith Colleges, to notify you of a security incident involving a New Hampshire resident. Hobart and William Smith Colleges are private liberal arts colleges in Geneva, New York.

Hobart and William Smith Colleges recently concluded an investigation of an incident that involved a vulnerability in a file transfer application (“FTA”) utilized by a third-party vendor, Accellion, Inc. Upon first learning of the unauthorized access to Accellion’s application, Hobart and William Smith Colleges immediately contacted law enforcement and launched an investigation.

Hobart and William Smith Colleges’ investigation determined that an unauthorized party exploited the vulnerability in the Accellion FTA on January 20, 2021, and then accessed or acquired files that had been previously transferred by the Colleges through the application. The Accellion FTA is self-contained and the Colleges’ own IT systems were not involved in this incident. Hobart and William Smith Colleges reviewed contents of the files that were accessed or acquired by the unauthorized party and, on March 31, 2021, determined that one or more of the files contained the name and Social Security number of one New Hampshire resident.

Beginning on April 9, 2021, Hobart and William Smith Colleges is providing written notice via United States Postal Service mail to the New Hampshire resident.¹ A sample copy of the letter is enclosed. Hobart and William Smith Colleges is offering a complimentary one-year membership in credit monitoring and identity theft protection services through Experian to the New Hampshire

¹ This notice does not waive Hobart and William Smith Colleges’ objection that New Hampshire lacks personal jurisdiction over it regarding any claims related to this incident.

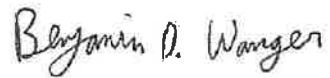
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resident. The notice letter also provides a dedicated telephone number the individual can call with any questions they may have.

To help prevent a similar incident from occurring in the future, Hobart and William Smith Colleges took the Accellion FTA offline permanently.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in cursive script that reads "Benjamin D. Wanger".

Benjamin D. Wanger
Counsel



HOBART AND WILLIAM SMITH
COLLEGES

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

<<MailID>>
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<<Address 3>>
<<Address 4>>
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<<City>><<State>><<Zip>>
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Dear <<Name1>>:

I write to notify you that the Colleges recently learned that a vulnerability in a file transfer software provided by our third-party vendor, Accellion, Inc., resulted in a data security incident that may have involved some of your information. Hobart and William Smith are among many Accellion customers whose data was involved in this incident. This notice explains the incident, as well as measures we have taken and steps you can take in response.

On March 24, 2021, we learned that a vulnerability in Accellion's File Transfer Appliance ("Accellion FTA") may have resulted in unauthorized access to some of the Colleges' files. The Colleges used the Accellion FTA to transfer files. Upon learning of the potential unauthorized access, we immediately contacted law enforcement and launched an investigation.

The ongoing investigation of this incident determined that unauthorized parties exploited the vulnerability in the Accellion FTA on January 20, 2021 and then accessed or acquired files that were transferred using the platform. The Accellion FTA is self-contained and the Colleges' own IT systems were **not** involved in this incident. Unfortunately, we learned on March 31, 2021 that one or more of these files contained your name and Social Security number.

We deeply regret any inconvenience or concern this incident may cause you, and we are committed to helping you minimize any possible impact. We recommend that you remain vigilant to the possibility of fraud by reviewing your financial account and payment card statements. We are also offering you a complimentary one-year membership in Experian's IdentityWorksSM. This product helps detect possible misuse of your information and provides you with identity protection support focused on immediate identification and resolution of identity theft. IdentityWorks is free and enrolling in this program will not hurt your credit score. **For more information on IdentityWorks, including instructions on how to activate your complimentary one-year membership, as well as some additional steps you can take to protect your information, please see the pages that follow this letter.**

To help prevent something like this from happening in the future, we have taken the Accellion FTA offline permanently. If you have any questions, please call our dedicated incident response line at 855-654-0907 The response line is available Monday through Friday, 6 am to 6 pm Eastern Time (excluding US Holidays).

Sincerely,

A handwritten signature in cursive script that reads "Fred Damiano".

Fred Damiano
Vice President of Strategic Initiatives and Chief Information Officer

EXPERIAN CREDIT MONITORING ENROLLMENT INSTRUCTIONS

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: <<Enrollment Deadline>> DATE (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**: <<Activation Code>>

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 **877.890.9332** Be prepared to provide engagement number <<Engagement Number>> 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.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any 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 companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

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 state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. Because most creditors need to see your credit report before they approve a new account, if they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, www.transunion.com
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com

You'll need to supply your name, address, date of birth, Social Security number and other personal information.

After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

You may contact Hobart and William Smith Colleges via U.S. mail at 300 Pulteney St, Geneva, NY 14456 or via telephone at 315-781-3000.

Additional Information for Residents of the Following States

Maryland: You may contact and obtain information from your state attorney general at: Maryland Attorney General's Office, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us

New York: You may contact and obtain information from these state agencies:

- New York Department of State Division of Consumer Protection, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>
- New York State Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>