



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

August 24, 2020

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

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

The Honorable Gordon MacDonald
Attorney General of the State of New Hampshire
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: *Notification of a Data Security Incident*

Dear Attorney General MacDonald:

We represent HUD Federal Credit Union (“HUD”) in connection with an incident that may have impacted the personal information of three (3) New Hampshire residents, and we provide this notice on behalf of HUD pursuant to N.H. REV. STAT. ANN. § 359-C:20.

This notice will be supplemented, if necessary, with any new significant facts discovered subsequent to its submission. While HUD is notifying you of this incident, HUD 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 BREACH OR UNAUTHORIZED USE OR ACCESS

HUD has learned that, starting on December 6, 2019, a third party illegally accessed six (6) HUD employee email accounts without authorization. Upon learning of the incident, HUD promptly secured the email accounts to prevent further access and engaged a forensic security firm to investigate and confirm the security of its email and computer systems. HUD is not aware of any fraud or identity theft to any individual as a result of this incident. Nevertheless, because HUD cannot confirm exactly what, if any, information may have been obtained by the third party, HUD searched the impacted accounts to determine if they contained any personal information. On May 20, 2020, HUD determined that the email accounts contained certain personal information of New Hampshire residents, including, depending on the individual, the individual’s name, address, date of birth, Social Security number, and/or financial information such account number and debit/credit card number.

polsinelli.com

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



July 20, 2020
Page 2

NUMBER OF NEW HAMPSHIRE RESIDENTS AFFECTED

The incident may have impacted three (3) New Hampshire residents. HUD mailed notification letters to these individuals on August 20, 2020. Enclosed is a sample of the notice that is being sent to the impacted residents via first-class United States mail.

STEPS TAKEN RELATING TO THE INCIDENT

Upon learning of the incident, HUD 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. Once it determined the identities of the individuals who were impacted by the incident, HUD worked to identify their mailing addresses, and sent notification to them as soon as possible after that. HUD is also undertaking efforts to reduce the risk of a similar incident occurring in the future, including strengthening its email security.

CONTACT INFORMATION

Please do not hesitate to contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,

A handwritten signature in black ink that reads "Bruce A. Radke".

Bruce A. Radke

Enclosure

HUD Federal Credit Union
Mail Handling Services
777 E Park Dr
Harrisburg, PA 17111



[Redacted]

August 21, 2020

Dear [Redacted]

HUD Federal Credit Union (“HUD”) is committed to protecting the privacy of the information entrusted to us and takes this responsibility seriously. This commitment extends to notifying individuals if we believe the security or privacy of their information may have been compromised. 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 starting on December 6, 2019, someone outside of HUD temporarily accessed our employee email accounts without authorization. We promptly contained the incident by securing the email accounts to prevent further access, conducted an internal investigation, and hired a leading forensic security firm to investigate the incident and confirm the security of our computer systems and network.

As a result of our investigation, on May 20, 2020 we determined that the accounts contained some of your personal information. **At this point, we do not believe that the unauthorized third party’s motivation was to access your personal information contained within the email accounts 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 may have been contained in the phished email accounts.

As part of our investigation, we searched the accounts for any personal information that could have been viewed. The impacted information contained in the relevant emails varied by individual but may have included your name, address, date of birth, Social Security number, driver’s license information, passport number, state ID number, and/or financial information such account number and debit/credit card number, expiration date, and CVV code. For a limited number of individuals, the relevant emails also contained username and password, digital signature, health insurance information, and/or limited medical information, which may include information related to medical history, conditions, diagnoses, or treatment; prescriptions; dates of service; doctor’s name; or medical records depending on the email content.

Again, although we are not aware of any instances of fraud or identity theft, out of an abundance of caution, we are offering a complimentary one-year membership to 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. For more information on IdentityWorks Credit 3B and how to activate your complimentary one-year membership, please see the additional information provided in this letter.

We value the trust you place in us and take our responsibility to safeguard your personal information seriously. We apologize for any inconvenience or concern this incident might cause. We are committed to taking steps to help prevent this from happening again, including reviewing our technical controls. For further assistance, please call 1-844-305-8390 from 8am to 5pm Eastern Time, Monday – Friday.

Sincerely,

A handwritten signature in black ink that reads "Catherine McDermott".

Catherine McDermott
Chief Executive Officer

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: **October 24, 2020** (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**: [REDACTED]

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 [REDACTED] 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 ExtendCARE™:** 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 877-890-9332 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 877-890-9332.

* 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.

Additional Important Information

As a precautionary measure, we recommend that 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").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps 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.

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/manualRequestForm.action>.

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:

Equifax
1-866-349-5191
www.equifax.com
P.O. Box 740241
Atlanta, GA 30374

Experian
1-888-397-3742
www.experian.com
P.O. Box 2002
Allen, TX 75013

TransUnion
1-800-888-4213
www.transunion.com
P.O. Box 2000
Chester, PA 19016

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 (1) 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 www.annualcreditreport.com.

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:

Equifax Security Freeze
1-800-349-9960
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

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 https://files.consumerfinance.gov/f/documents/bcfp_consumer-rights-summary_2018-09.pdf, or by requesting information in writing from the Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

Maryland Residents: Maryland residents can contact the Office of the Attorney General to obtain information about steps you can take to avoid identity theft from the Maryland Attorney General's office at: Office of the Attorney General, 220 St. Paul Place, Baltimore, MD 21202, (888) 743-0023.

North Carolina Residents: 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, 9001 Mail Service Center, Raleigh, NC 27699-9001, (877) 566-7226.

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.