



MULLEN  
COUGHLIN<sub>LLC</sub>  
ATTORNEYS AT LAW

RECEIVED

FEB 10 2020

CONSUMER PROTECTION

Brian F. Fox  
Office: (267) 930-4777  
Fax: (267) 930-4771  
Email: bfox@mullen.law

1275 Drummers Lane, Suite 302  
Wayne, PA 19087

February 7, 2020

**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**

Dear Sir or Madam:

We represent Idaho Central Credit Union (“ICCU”) located at P.O. Box 2469, Pocatello, ID 83206, and are writing to notify your office of an incident that may affect the security of some 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, ICCU 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 November 5, 2019, ICCU discovered suspicious activity related to a third-party mortgage lending portal utilized by its employees. ICCU immediately launched an investigation, with the support of forensic investigators, to determine the nature and scope of the activity.

On November 8, 2019 ICCU’s investigation confirmed that there was unauthorized access to the third-party mortgage lending portal. ICCU undertook a lengthy and labor-intensive process to identify the personal information contained within the affected portal. On January 17, 2020, ICCU determined that the affected portal contained the following information related to one (1) New Hampshire resident: name, Social Security number, and financial account information.

### **Notice to New Hampshire Resident**

On February 7, 2020, ICCU provided written notice of this incident to affected individuals, which includes one (1) New Hampshire resident. Written notice is being provided in substantially the same form as the letter attached hereto as *Exhibit A*.

### **Other Steps Taken and To Be Taken**

Upon discovering the event, ICCU moved quickly to investigate and respond to the incident, assess the security of ICCU's systems, and notify potentially affected individuals. ICCU is also working to implement additional safeguards and training to its employees. ICCU is providing complimentary access to twenty-four (24) months of credit monitoring and identity protection services through Kroll to individuals whose personal information was potentially affected by this incident.

Additionally, ICCU is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. ICCU 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.

### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4777.

Very truly yours,



Brian F. Fox of  
MULLEN COUGHLIN LLC

BFF/MLL/mep

# **EXHIBIT A**



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

<<FirstName>> <<MiddleName>> <<LastName>> <<NameSuffix>>  
<<Address1>>  
<<Address2>>  
<<City>>, <<State>> <<Zip>>

RE: Notice of Data Breach

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

Idaho Central Credit Union ("ICCU") is writing to inform you of a recent event that may impact the privacy of some of your personal information. We want to provide you with information about the event, our response, and steps you may take to better protect against potential misuse of your information, should you feel it necessary.

**What Happened?** On November 5, 2019, ICCU discovered suspicious activity related to a third-party mortgage portal utilized by its employees. ICCU immediately launched an investigation, with the support of third-party forensic investigators, to determine the nature and scope of the activity. On November 8, 2019, ICCU determined that there was unauthorized access to the portal. ICCU undertook a lengthy and labor-intensive process to identify the personal information contained within the affected portal. ICCU is notifying you because we have confirmed that your information was present in the affected portal. Please note that the information affected by this incident was stored on the third-party mortgage portal and not on ICCU's systems.

**What Information Was Involved?** On January 17, 2020, ICCU's investigation determined that the following information related to you was present in the affected portal: <<ClientDef1(Impacted Data)>>. Your address information may have also been present in the affected portal.

**What We Are Doing.** ICCU takes the confidentiality, privacy, and security of information in our care seriously. We have security measures in place to protect the data on our systems and we continue to assess and update security measures and training to our employees to safeguard the privacy and security of information in our care. We are also notifying regulatory authorities, as required by law.

As an added precaution, ICCU is providing you with access to twenty-four (24) months of identity monitoring services from Kroll, at no cost to you. Please note that you must complete the activation process yourself, as we are not permitted to activate these services on your behalf.

**What You Can Do.** We encourage you to enroll in the identity monitoring services through Kroll. ICCU also encourages 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. Please review the enclosed *Steps You Can Take to Help Protect Your Information*, which contains instructions on how to activate the complimentary identity monitoring services.

**For More Information.** We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-???-???-????, which is available Monday through Friday, from 8:00 a.m. to 5:30 p.m. Central Time, excluding U.S. holidays.

ICCU sincerely regrets any inconvenience or concern this incident may have caused you.

Sincerely,

A handwritten signature in cursive script that reads "Brenda Worrell".

Brenda Worrell, Chief Operating Officer  
Idaho Central Credit Union



## Steps You Can Take to Help Protect Your Information

### Activate Your Identity Monitoring

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for two years. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit [IDMonitoringURL](mailto:IDMonitoringURL) to activate and take advantage of your identity monitoring services.

You have until [Date](mailto:Date) to activate your identity monitoring services.

Kroll Membership Number: [Member ID](mailto:Member ID)

Additional information describing your services is included with this letter.

### Monitor Your Accounts

We 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. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. 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 contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security 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 security 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 security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

<b>Experian</b> P.O. Box 9554 Allen, TX 75013 1-888-397-3742 <a href="http://www.experian.com/freeze/center.html">www.experian.com/freeze/center.html</a>	<b>TransUnion</b> P.O. Box 160 Woodlyn, PA 19094 1-888-909-8872 <a href="http://www.transunion.com/credit-freeze">www.transunion.com/credit-freeze</a>	<b>Equifax</b> P.O. Box 105788 Atlanta, GA 30348-5788 1-800-685-1111 <a href="http://www.equifax.com/personal/credit-report-services">www.equifax.com/personal/credit-report-services</a>
---	--	---

To request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your 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 agencies listed below:

<b>Experian</b> P.O. Box 9554 Allen, TX 75013 1-888-397-3742 <a href="http://www.experian.com/fraud/center.html">www.experian.com/fraud/center.html</a>	<b>TransUnion</b> P.O. Box 2000 Chester, PA 19016 1-800-680-7289 <a href="http://www.transunion.com/fraud-victim-resource/place-fraud-alert">www.transunion.com/fraud-victim-resource/place-fraud-alert</a>	<b>Equifax</b> P.O. Box 105069 Atlanta, GA 30348 1-888-766-0008 <a href="http://www.equifax.com/personal/credit-report-services">www.equifax.com/personal/credit-report-services</a>
---	---	--



### **Additional Information**

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission can 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); 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 Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, (410) 528-8662, [www.oag.state.md.us](http://www.oag.state.md.us). **For New York residents**, the Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <https://ag.ny.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 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 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](http://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 North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6000, [www.ncdoj.gov](http://www.ncdoj.gov). You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft. **For Rhode Island Residents**, the Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903; [www.riag.ri.gov](http://www.riag.ri.gov). (401) 274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. [There are <<#>> Rhode Island residents impacted by this incident.](#)

## **TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES**

You've been provided with access to the following services<sup>1</sup> from Kroll:

### **Single Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

<sup>1</sup> Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.