



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

STATE OF NH  
DEPT OF JUSTICE  
2017 DEC 13 AM 11:00

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1275 Drummers Lane, Suite 302  
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December 1, 2017

**VIA U.S. MAIL**

Attorney General Joseph Foster  
Office of the New Hampshire Attorney General  
Attn: Security Breach Notification  
33 Capitol Street  
Concord, NH 03301

Re: Notice of Security Event

Dear Attorney General Foster:

We represent IH Mississippi Valley Credit Union, ("IHMVCU"), 2121 47<sup>th</sup> St. Moline, IL 61265, and are writing to notify your office of an incident that may affect the security of some personal information relating to 1 New Hampshire resident. The investigation into this event is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, IHMVCU does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

**Nature of the Security Event**

On October 2, 2017, IHMVCU learned that a credit union employee was the victim of an email phishing scam. This was a highly-sophisticated attack to gain unauthorized access to the email inbox on or about August 30, 2017. Upon discovering the security incident, we immediately began working with an independent third-party to conduct a complete forensic investigation. The forensic investigation confirmed that a small group of individuals may have been affected. The information that could have been affected includes the following categories of information: Name, address, Social Security number, and/or member account number. IHMVCU has no evidence of the actual or attempted misuse of this information.

**Notice to New Hampshire Resident**

On December 1, 2017, IHMVCU will begin mailing written notice of this incident to affected individuals, which includes 1 New Hampshire resident. Written notice will be provided in substantially the same form as the letter attached here as *Exhibit A*.

**Other Steps Taken and To Be Taken**

Upon learning of this incident, IHMVCU moved quickly to identify potentially impacted individuals, put in place resources to assist them, and provide them with notice of this incident.

IHMVCU is providing affected individuals access to 1 free year of credit monitoring and identity restoration services through TransUnion, and has established a dedicated hotline for potentially affected individuals to contact with questions or concerns regarding this incident. Additionally, IHMVCU is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including 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. IHMVCU is also providing written notice of this incident to federal law enforcement and other state regulators, as necessary.

**Contact Information**

Should you have any questions regarding this notification or other aspects of the security event, please contact us at 267-930-4799.

Very truly yours,



Sian Schafle of  
MULLEN COUGHLIN LLC

# Exhibit A



RETURN MAIL PROCESSING CENTER  
 PO BOX 6336  
 PORTLAND, OR 97228-6336

<<Mail ID>>  
 <<Name 1>>  
 <<Name 2>>  
 <<Address 1>>  
 <<Address 2>>  
 <<Address 3>>  
 <<Address 4>>  
 <<Address 5>>  
 <<City>><<State>><<Zip>>  
 <<Country>>

<<Date>>

RE: Notice of Data Breach

Dear <<Name1>>:

IH Mississippi Valley Credit Union, (“IHMVCU”), is writing to inform you of a recent security event. While there is currently no evidence that any information has been misused, we are making you aware of the event so you may take steps to better protect against the possibility of identity theft or fraud, should you feel it necessary to do so.

**What Happened?** On October 2, 2017, IHMVCU learned that a credit union employee was the victim of an email phishing scam. This was a highly-sophisticated attack to gain unauthorized access to the email inbox on or about August 30, 2017. Upon discovering the security incident, we immediately began working with an independent third-party to conduct a complete forensic investigation. The forensic investigation confirmed that a small group of individuals may have been affected.

<<DataElementsTrigger>>

**What We Are Doing.** We have reported the incident to federal law enforcement, and have implemented additional safeguards to protect our members’ personal information.

**What Can You Do.** As an added precaution, we have partnered with TransUnion to provide you with *myTrueIdentity* for 1 year at no charge to you. A description of this product is provided in the attached materials, which also contain instructions about how to enroll (including your personal activation code). Please note that you must complete the enrollment process, as we are not able to enroll you in these services on your behalf.

**For More Information.** IHMVCU places a high priority on data security and consumer privacy and sincerely regret any inconvenience this may have caused. If you have questions, you are encouraged to call our dedicated assistance line at 844-327-2361 (toll free), Monday through Friday, 9:00 a.m. – 9:00 p.m. Eastern Standard Time.

Sincerely,

Brian M. Laufenberg  
 President/CEO

## **STEPS YOU CAN TAKE TO PREVENT IDENTITY THEFT AND FRAUD**

### **Credit Monitoring & Identity Restoration Services**

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*myTrueIdentity*) for one year provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies.

To enroll in this service, go to the *myTrueIdentity* website at [www.mytrueidentity.com](http://www.mytrueidentity.com) and in the space referenced as "Enter Activation Code", enter the following 12-letter Activation Code <<Enrollment Code>> and follow the three steps to receive your credit monitoring service online within minutes.

If you do not have access to the Internet and wish to enroll in a similar offline, paper based, credit monitoring service, via U.S. Mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the following 6-digit telephone pass code <<Engagement Number>> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and <<Enrollment Deadline>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion, or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

Once you are enrolled, you will be able to obtain one year of unlimited access to your TransUnion credit report and credit score. The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised to help you restore your identity and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

### **Monitor Your Accounts**

**Credit Reports:** In addition to enrolling to receive the complimentary monitoring services, we encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports and explanation of benefits forms 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.

**Fraud Alerts:** At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax  
P.O. Box 105069  
Atlanta, GA 30348  
800-525-6285  
[www.equifax.com](http://www.equifax.com)

Experian  
P.O. Box 2002  
Allen, TX 75013  
888-397-3742  
[www.experian.com](http://www.experian.com)

TransUnion  
P.O. Box 2000  
Chester, PA 19106  
800-680-7289  
[www.transunion.com](http://www.transunion.com)

**Security Freeze:** You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft and you provide the credit bureau with a valid police report, it cannot

charge you to place, lift, or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze  
P.O. Box 105788  
Atlanta, GA 30348  
1-800-685-1111  
www.freeze.equifax.com

Experian Security Freeze  
P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742  
www.experian.com/freeze

TransUnion  
P.O. Box 2000  
Chester, PA 19016  
1-888-909-8872  
www.transunion.com

### **Additional Information**

You can further educate yourself regarding identity theft, fraud alerts, and the steps you can take to protect yourself, by contacting 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); and TTY: 1-866-653-4261. **For Maryland residents**, the Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and [www.oag.state.md.us](http://www.oag.state.md.us). **For North Carolina residents**, the Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC. 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 crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement. This notice has not been delayed by law enforcement.