



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW



Edward J. Finn
Office: 267-930-4776
Fax: 267-930-4771
Email: efinn@mullen.law

1275 Drummers Lane, Suite 302
Wayne, PA 19087

November 8, 2017

VIA U.S. 1st CLASS MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Attorney General MacDonald:

Our office represents InTouch Credit Union, headquartered at 5640 Democracy Drive, Plano, TX 75024. We write to notify you of an incident, which occurred at a third-party vendor, that may affect the security of personal information relating to eight (8) New Hampshire residents. The investigation into this situation is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, InTouch Credit Union 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.

Background

Earlier this year, InTouch Credit Union worked with a third-party vendor to provide data analytics services. As part of this engagement, InTouch Credit Union provided the vendor with information relating to certain InTouch Credit Union members. On October 10, 2017, this vendor notified InTouch Credit Union that it was the victim of a ransomware attack and files containing InTouch Credit Union member information may have been affected. InTouch Credit Union immediately launched an investigation to determine what happened and what information, if any, may have been accessed or accessible by an unauthorized individual. On October 16, 2017, the third-party vendor confirmed that it could not rule out that InTouch Credit Union member information may have been subject to unauthorized access and acquisition by unauthorized actors in connection

Attorney General Gordon J. MacDonald
November 8, 2017
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with the ransomware attack. The unauthorized access or acquisition may have occurred between July 2, 2017 and October 10, 2017.

The following information about eight (8) New Hampshire residents may have been subject to unauthorized access or acquisition: name, Social Security number, financial account information, and loan account information. We note that Social Security numbers were not connected to names; however, if the unauthorized actor was able to acquire all the data, then the actor could potentially make a connection between names and Social Security numbers.

Notice to New Hampshire Residents

InTouch Credit Union is mailing written notice of this incident to these eight (8) New Hampshire residents on November 8, 2017 in substantially the same form as the letter attached hereto as *Exhibit A*.

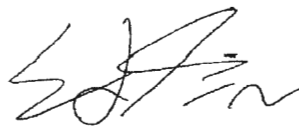
Other Steps Taken and To Be Taken

InTouch Credit Union is offering all impacted individuals with one year of complimentary credit monitoring and identity restoration services in addition to providing all impacted individuals with helpful information on how to protect against identity theft and fraud. InTouch Credit Union is also reviewing its vendor contracts to reduce the likelihood that an incident like this will happen in the future. In addition to providing notice of this incident to your office, InTouch Credit Union is also providing notice of this incident to certain other state regulators, federal regulators, and consumer reporting agencies as required.

Contact Information

Should you have any questions regarding this notification or other aspects of this event, please contact us at 267-930-4776.

Very truly yours,



Edward J. Finn of
MULLEN COUGHLIN LLC

EJF:ncl

Enclosure

EXHIBIT A



15951
JOHN Q. SAMPLE
1234 MAIN STREET
ANYTOWN US 12345-6789

November 8, 2017

Re: Notice of Data Breach

Dear John Sample:

InTouch Credit Union takes the security of your information very seriously. We are writing to inform you of a recently discovered incident that occurred at one of our vendors and which could impact the security of your personal information. While there currently is no indication that your information has been used to commit identity theft or fraud, we want to provide you with background and information on what you can do to better protect against the possibility of identity theft and fraud if you feel it is appropriate to do so. **Please note that the account impacted by this incident is closed at InTouch Credit Union.**

What Happened? Earlier this year, InTouch Credit Union worked with a third-party vendor to provide data analytics services. As part of this engagement, we provided the vendor with information related to certain InTouch members. On October 10, 2017, this vendor notified us that it was the victim of a ransomware attack and files containing InTouch Credit Union member information may have been affected. We immediately launched an investigation to determine what happened and what information, if any, may have been accessed or accessible by an unauthorized individual. On October 16, 2017, the third-party vendor confirmed that it could not rule out that InTouch member information may have been subject to unauthorized access and acquisition by unauthorized actors in connection with the ransomware attack. The unauthorized access or acquisition may have occurred between July 2, 2017 and October 10, 2017.

What Information Was Involved? The following information about you was affected and may have been subject to unauthorized access or acquisition: Social Security number, financial account information, loan account information, and name. We note that your Social Security number was not connected to your name; however, if the unauthorized actor was able to steal all the data, then the actor could potentially make a connection between your name and Social Security number. Our investigation and the vendor's investigation are ongoing, and, at this time, we cannot confirm whether your information was actually accessed or acquired by the unauthorized individual. However, we are notifying you out of an abundance of caution.

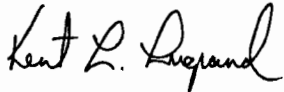
What We Are Doing. We take this event, and the security of your information, very seriously. In addition to taking the steps detailed above and providing this notice to you, we are reviewing our vendor contracts to reduce the likelihood that an incident like this will happen in the future. While we are unaware of any actual or attempted misuse of your information, we are offering you complimentary access to 12 months of free credit monitoring and identity restoration services with AllClear ID. We are also notifying state and federal regulators and consumer reporting agencies of this incident as required.



What You Can Do. Please review the enclosed *Steps You Can Take to Protect Your Information* for additional information on how to better protect against identity theft and fraud, as well as for instructions on how to enroll and receive the free credit monitoring and identity restoration services.

For More Information. The trust of our members and former members is paramount to us. We understand you may have questions that are not answered in this letter. To ensure your questions are answered timely please contact our call center staffed with individuals familiar with this event and protecting against identity theft and fraud. The call center can be reached by calling 1-855-303-9809. The call center is available Monday through Saturday, 9:00 a.m. to 9:00 p.m. E.T.

Sincerely,

A handwritten signature in cursive script that reads "Kent L. Lugrand".

Kent L. Lugrand
President/CEO

STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

As an added precaution, we have arranged to have AllClear ID protect your identity for 12 months at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next 12 months.

AllClear Identity Repair: This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-303-9809 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

AllClear Credit Monitoring: This service offers additional layers of protection including credit monitoring and a \$1 million identity theft insurance policy. To use this service, you will need to provide your personal information to AllClear ID. You may sign up online at enroll.allclearid.com or by phone by calling 1-855-303-9809 using the following redemption code: Redemption Code.

Please note: Additional steps may be required by you in order to activate your phone alerts and monitoring options.

We encourage you to remain vigilant over the next twelve to twenty-four months 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 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.

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
1-800-525-6285
www.equifax.com

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

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
1-800-680-7289
www.transunion.com

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
(NY residents please call
1-800-349-9960)
www.freeze.equifax.com

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
[www.experian.com/freeze/
center.html](http://www.experian.com/freeze/center.html)

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
1-888-909-8872
[www.transunion.com/
securityfreeze](http://www.transunion.com/securityfreeze)

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; 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. **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. **For North Carolina residents**, the Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at www.ncdoj.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, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580. Customers have the right to file a police report if they 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, customers 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 as a result of a law enforcement investigation.



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JOHN Q. SAMPLE
1234 MAIN STREET
ANYTOWN US 12345-6789

November 8, 2017

Re: Notice of Data Breach

Dear John Sample:

InTouch Credit Union takes the security of your information very seriously. We are writing to inform you of a recently discovered incident that occurred at one of our vendors and which could impact the security of your personal information. While there currently is no indication that your information has been used to commit identity theft or fraud, we want to provide you with background and information on what you can do to better protect against the possibility of identity theft and fraud if you feel it is appropriate to do so.

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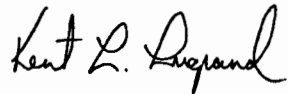
What We Are Doing. We take this event, and the security of your information, very seriously. In addition to taking the steps detailed above and providing this notice to you, we are reviewing our vendor contracts to reduce the likelihood that an incident like this will happen in the future. While we are unaware of any actual or attempted misuse of your information, we are offering you complimentary access to 12 months of free credit monitoring and identity restoration services with AllClear ID. We are also notifying state and federal regulators and consumer reporting agencies of this incident as required.



What You Can Do. Please review the enclosed *Steps You Can Take to Protect Your Information* for additional information on how to better protect against identity theft and fraud, as well as for instructions on how to enroll and receive the free credit monitoring and identity restoration services.

For More Information. The trust of our members is paramount to us. We understand you may have questions that are not answered in this letter. To ensure your questions are answered timely please contact our call center staffed with individuals familiar with this event and protecting against identity theft and fraud. The call center can be reached by calling 1-855-303-9809. The call center is available Monday through Saturday, 9:00 a.m. to 9:00 p.m. E.T.

Sincerely,

A handwritten signature in black ink that reads "Kent L. Lugrand". The signature is written in a cursive style with a large, stylized initial "K".

Kent L. Lugrand
President/CEO

STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

As an added precaution, we have arranged to have AllClear ID protect your identity for 12 months at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next 12 months.

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AllClear Credit Monitoring: This service offers additional layers of protection including credit monitoring and a \$1 million identity theft insurance policy. To use this service, you will need to provide your personal information to AllClear ID. You may sign up online at enroll.allclearid.com or by phone by calling 1-855-303-9809 using the following redemption code: Redemption Code.

Please note: Additional steps may be required by you in order to activate your phone alerts and monitoring options.

We encourage you to remain vigilant over the next twelve to twenty-four months 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 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.

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www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
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www.transunion.com

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Equifax Security Freeze
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Atlanta, GA 30348
1-800-685-1111
(NY residents please call
1-800-349-9960)
www.freeze.equifax.com

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
[www.experian.com/freeze/
center.html](http://www.experian.com/freeze/center.html)

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
1-888-909-8872
[www.transunion.com/
securityfreeze](http://www.transunion.com/securityfreeze)

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; 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. **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. **For North Carolina residents**, the Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at www.ncdoj.gov. **For Rhode Island residents**, the Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at www.riag.ri.gov. A total of 5 Rhode Island resident may be impacted by this incident. **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, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580. Customers have the right to file a police report if they 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, customers 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 as a result of a law enforcement investigation.