



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED
JUN 18 2018
CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302
Wayne, PA 19087

June 13, 2018

VIA U.S. 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 Security Incident

Dear Gordon J. MacDonald:

We represent Ithaca College located at 316 Peggy Ryan Williams Center, Ithaca NY 14850. We write to notify your office of an incident that may affect the security of some personal information relating to five (5) New Hampshire residents. By providing this notice, Ithaca College 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 or about March 8, 2018, Ithaca College became aware of malware encryption files on its London Center's server. Ithaca immediately launched an extensive investigation, which included working with two third-party forensic investigators and confirmed a ransomware attack impacting the London Center server and a vulnerability which existed for an unknown time period. Although there was no forensic evidence of unauthorized access to or exfiltration of personally identifiable information on the server, Ithaca College was unable to forensically rule out that possibility. Ithaca performed a review of information stored on the server to identify individuals whose personal information may have been viewed or accessed by an unauthorized actor. This process has been ongoing.

The information that could have been subject to unauthorized access includes name, address and Social Security number.

Notice to New Hampshire Residents

On or about June 13, 2018, Ithaca College provided written notice of this incident to all affected individuals, which includes five (5) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, Ithaca College moved quickly to investigate and respond to the incident, assess the security of Ithaca College systems, and notify potentially affected individuals. Ithaca College is also working to implement additional safeguards and training to its employees.

Ithaca College is providing access to credit monitoring services for 36 months through AllClear ID, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Ithaca College 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. Ithaca College is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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) 930-4799.

Very truly yours,



James E. Prendergast of
MULLEN COUGHLIN LLC

JEP/alc
Enclosure

EXHIBIT A



Division of Legal Affairs

Processing Center • P.O. BOX 141578 • Austin, TX 78714

00028
JOHN Q. SAMPLE
1234 MAIN STREET
ANYTOWN US 12345-6789

June 13, 2018

Re: Notice of Data Security Incident

Dear John Sample:

Ithaca College (“Ithaca”) is writing to notify you of an incident that may affect the security of your personal information. We are providing you with information regarding the incident, steps we have taken since discovering the incident, and what you can do to protect against identify theft and fraud.

What Happened? On March 8, 2018 Ithaca became aware of malware encryption of files on its London Center’s server. Ithaca immediately launched an investigation, which included working with third-party forensic investigators, and confirmed a ransomware attack impacting the London Center server. Although there was no forensic evidence of unauthorized access to or exfiltration of personally identifiable information on the server, Ithaca was unable to forensically rule out that possibility. Ithaca performed a review of information stored in the server to identify individuals whose personal information may have been viewed or downloaded by an unauthorized actor. This process has been ongoing, and we recently confirmed individuals whose personal information may be at risk.

What Information Was Involved? Our investigation determined the following types of your personal information were stored within the impacted server and may have been viewed or downloaded by an unauthorized actor: **Driver's License number** and name.

What We Are Doing. Ithaca takes the privacy and security of your personal information very seriously. We have security measures in place to protect the data in our care and we are working to implement additional safeguards and provide additional training to our employees on safeguarding the privacy and security of information on our systems.

What You Can Do. You can review the attached *Steps You Can Take to Protect Against Identity Theft and Fraud*. You can also enroll to receive the free services being offered to you.

For More Information: We recognize that you may have questions that are not answered in this letter. We have established a confidential, toll-free hotline to assist you with questions regarding this incident, the free services we are making available, and steps you can take to protect yourself against identity theft and fraud. The hotline is available Monday through Saturday, 9:00 a.m. to 9:00 p.m. ET, at 1-855-686-9415.



We sincerely regret any inconvenience this incident may cause. Ithaca College remains committed to safeguarding information in our care and will continue to take proactive steps to enhance data security.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Pringle", with a stylized flourish at the end.

Nancy Pringle
Executive Vice President & General Counsel
Ithaca College

Steps You Can Take to Protect Against Identity Theft and Fraud

As an added precaution, we have arranged to have AllClear ID protect your identity for 36 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 36 months.

AllClear Identity Repair: This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-686-9415 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

AllClear Fraud Alerts with Credit Monitoring: This service offers the ability to set, renew, and remove 90-day fraud alerts on your credit file to help protect you from credit fraud. In addition, it provides credit monitoring services, a once annual credit score and credit report, and a \$1 million identity theft insurance policy. To enroll in 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 1-855-686-9415 using the following redemption code: Redemption Code.

Please note: Following enrollment, additional steps are required by you in order to activate your phone alerts and fraud alerts, and to pull your credit score and credit file. Additional steps may also be required in order to activate your monitoring options.

In addition to enrolling to receive the above services, you may take additional action directly to further protect against possible identity theft or financial loss. 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, visit www.annualcreditreport.com or call, toll-free 1-8777-322-8228. 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 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 19016
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 https://www.freeze.equifax.com	Experian Security Freeze P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	TransUnion P.O. Box 2000 Chester, PA 19016 1-888-909-8872 www.transunion.com/securityfreeze
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You can further educate yourself regarding identity theft, and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue, NW, Washington, DC 20580; www.ftc.gov/idtheft; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC. You can also further educate yourself about placing a fraud alert or security freeze on your credit file by contacting the FTC or your state's Attorney General. This notice has not been delayed as a result of a law enforcement investigation. **For Maryland residents**, the Maryland 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 at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-919-716-6400; and www.ncdoj.gov. **For Rhode Island residents**, the attorney general can be contacted by mail at 150 South Main St., Providence, RI 02903; and online at www.riag.ri.gov. Approximately 2 Rhode Island residents may have been affected by this incident.