

RECEIVED

JUN 10 2021

CONSUMER PROTECTION

June 3, 2021

Consumer Protection Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

RE: Lutheran Family Services Of Nebraska, Inc. / Notice of Data Breach

Dear Sir or Madame:

My firm serves as outside counsel to Lutheran Family Services Of Nebraska, Inc. in this matter. Pursuant to New Hampshire Statutes Section 359C:20, enclosed is a copy of the notice letter that was sent on today's date to one (1) New Hampshire resident. The name and address of the New Hampshire resident has been redacted.

If you have any questions, please contact the undersigned.

Kind regards.

Very truly yours,




Tom Kelley

Enc.

NOTICE OF DATA BREACH

June 3, 2021


RE: Notice of Data Breach / Important Security Notification / Please Read This Entire Letter

Dear 

Lutheran Family Services of Nebraska, Inc. takes the privacy and confidentiality of your information very seriously. We write to inform you of an incident that may have involved some of your personal information. This notice explains the incident, measures we have taken, and steps you can take in response.

WHAT HAPPENED

On February 1, 2021, one of our employees in our adoption services area ("Employee 1") advised us that people outside our organization appeared to be receiving emails from Employee 1 that Employee 1 did not recall sending. On the same day, February 1, 2021, we took immediate action to block any unauthorized access to Employee 1's email account. We immediately launched an investigation into the incident and engaged a cybersecurity firm to assist in its efforts to determine whether unauthorized persons had accessed Employee 1's email account. During that cyber investigation, on March 2, 2021, one of our employees in our administrative area ("Employee 2") advised us that people outside our organization appeared to be receiving emails from Employee 2 that Employee 2 did not recall sending. On the same day, March 2, 2021, we took immediate action to block any unauthorized access to Employee 2's email account. The cybersecurity firm we engaged expanded their investigation to cover this second incident.

In its investigation concluded April 6, 2021, the cybersecurity firm found:

1. On January 16, 2021, and February 1, 2021, unauthorized individuals gained access to Employee 1's email account and on February 1, 2021, an unauthorized individual sent phishing emails to email addresses contained in the address book in Employee 1's email account. The unauthorized access was created when Employee 1 opened a phishing email on December 15, 2020. "Phishing" is a fraudulent practice where bad actors send emails purporting to be from a reputable organization in order to trick the recipients into revealing their personal information such as a recipient's email account sign on information.
2. On February 27, 2021, March 1, 2021 and March 2, 2021, unauthorized individuals gained access to Employee 2's email account and on March 2, 2021, an unauthorized individual sent phishing emails to email addresses contained in the address book in Employee 2's email account. The unauthorized access was created when Employee 2 opened a phishing email on February 15, 2020.

3. The cybersecurity firm did not find any evidence that your personal information was copied or otherwise stolen from our organization by unauthorized individuals. The cybersecurity firm, did conclude, however, that the unauthorized individuals had temporary access to the content of Employee 1's email account and Employee 2's email account.

WHAT INFORMATION WAS INVOLVED

Employee 1's and Employee 2's email accounts contained the following types of personal information: information about an individual's physical or mental health or condition, information about the provision of healthcare to an individual, information about the payment for the provision of healthcare to an individual, social security numbers, driver's license or state identification numbers and nonfinancial account usernames and passwords. Although the cybersecurity firm did not find any evidence that your personal information was copied or otherwise stolen from our organization by an unauthorized individual, the cybersecurity firm could not rule out the possibility that an unauthorized individual may have accessed your personal information. It is therefore possible that your personal information was viewed or acquired by the unauthorized individual.

We have identified the names of all individuals who were impacted by this incident, as well as the type of personal information involved. Employee 1's email account affected three-hundred forty-one (341) individuals. Employee 2's email account affected thirty-two (32) individuals. In your case, your personal information that may have been accessed was as follows:

Your driver's license or state identification number

WHAT YOU CAN DO

In the event you become aware of any suspected identity theft arising out of this incident we recommend you report such incidents to local law enforcement, your respective State Attorney General and/or the Federal Trade Commission. The Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC, 20580, has an identity theft hotline, 877-438-4338 / TTY: 1-866-653-4261, and also provides information on-line at www.ftc.gov/idtheft. We also advise you to remain vigilant by reviewing account statements and monitoring free credit reports. Contact information for the credit reporting companies is set out below:

Equifax P.O. Box 740256 Atlanta, GA 30374-0256 1-800-525-6285 www.equifax.com	Experian P.O. Box 4500 Allen, TX 75013 1-888-397-3742 www.experian.com	TransUnion P.O. Box 2000 Chester, PA 19616-2000 1-800-680-7289 www.transunion.com
--	--	---

You can obtain information from these sources about fraud alerts and security freezes.

WHAT WE ARE DOING

Lutheran Family Services of Nebraska, Inc. is committed to safeguarding your personal information and has taken immediate steps to enhance the protections that were already in place before this incident. In addition to this investigation, we are implementing additional security requirements when our employees sign into our network. We have deployed additional security measures to monitor our network for any indication of a future attack. We are also reinforcing and providing additional mandatory phishing awareness training and simulations for our staff. Finally, additional IT staff has been added to assist with security and training efforts across our organization.

To help protect your identity, we are offering you a complimentary one-year membership of Experian's® IdentityWorksSM. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: July 31, 2021** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your **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** by **July 31, 2021**. 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 MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks.

You can contact Experian regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.³⁹⁵
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance³⁹⁶:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at **877-890-9332**. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for one year from the date of this letter. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

³⁹⁵ Offline members will be eligible to call for additional reports quarterly after enrolling.

³⁹⁶ The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Page 4

We sincerely regret this incident and any inconvenience it may cause you. Should you have questions or concerns regarding this matter, please do not hesitate to contact Lutheran Family Services of Nebraska, Inc. at **833-903-2376**. If you prefer, our fax number is **402-591-5075** and our mailing address is:

Lutheran Family Services of Nebraska, Inc.
124 S. 24th St. Suite 230
Omaha, NE 68102

Sincerely,

A handwritten signature in blue ink, appearing to read "Dave Johnson".

Dave Johnson
Interim CEO
Lutheran Family Services of Nebraska, Inc.