

HUSCH BLACKWELL

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RECEIVED
JUN 13 2019
CONSUMER PROTECTION

June 12, 2019

VIA FEDERAL EXPRESS

Consumer Protection and Antitrust Bureau
Office of the Attorney General
33 Capitol Street
Concord, New Hampshire 03301

Dear Mr. Attorney General:

We are writing to notify the Office of the Attorney General of a data breach regarding our client, Missouri Southern State University (the “University”), a Missouri institution of higher education located at 3950 Newman Road, Joplin, MO 64801. The University completed an investigation of a cybersecurity attack that involved the information of 11 New Hampshire residents, and it has asked us to assist with the notification process. Since the University is an entity of the State of Missouri, the University has been in regular communication with the Missouri Attorney General’s Office about the attack.

On January 9, 2019, the University was alerted to a possible cybersecurity attack triggered by a phishing email. The email contained a link, which when clicked, allowed the perpetrator to potentially copy that employee’s Office 365 account. Unfortunately, several employees fell victim to the fraudulent scheme. As soon as it detected this attack, the University contacted the FBI Cyber Crime Task Force and was directed to delay notification of potentially affected individuals until its investigation was complete. The University immediately engaged a leading forensic investigation firm to look into the matter and undertook enhancements to its already robust IT systems to block potential e-mail exploitation, including a mass password reset of all employee Office 365 accounts.

The University, in conjunction with the forensic investigation firm, analyzed the entire contents of the impacted Office 365 accounts. The process entailed several iterations of a variety of review methods to identify personally identifiable information (“PII”) that may have been compromised. In late March, April, and early May, the University identified e-mails containing PII that may have been compromised by the attack. In mid-May, the University confirmed that the first and last names and social security numbers of certain University employees, candidates, students, and alumni were contained in the accounts.

Once the University discovered this attack, it took immediate steps to analyze and improve security and monitoring of its Office 365 accounts containing sensitive information. As part of the investigation and remediation efforts, the University also engaged a forensics team, other cybersecurity experts, and law enforcement. The University started working straightaway to notify impacted individuals once the investigation

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was complete and the results were communicated with law enforcement and other regulators. Although it appears that the risk of harm to impacted individuals is minimal as a result of this incident, the University is offering, among other things, 24 months of complimentary credit monitoring and \$1 million dollars in identity theft insurance.

Please see the enclosed notification letter that was provided to the affected individuals. The notification will be mailed on June 13, 2019. If you have questions or need additional information regarding this incident, please do not hesitate to contact me.

Very truly yours,



Wakaba Tessier
Partner

Enclosures



To Enroll, Please Call:
(800) 395-3686
Or Visit:
<https://app.myidcare.com/account-creation/protect>
Enrollment Code: <<XXXXXXXX>>

<<Date>>

Re: Notice of Data Breach

Dear <<Name>>:

We are writing to share important information about a recent incident involving Missouri Southern State University that may have affected your personal information.

What Happened

On January 9, 2019 the University was alerted to a possible cybersecurity attack triggered by a phishing email. The email contained a link, which, when clicked, allowed the perpetrator to potentially copy that employee's Office 365 account. Unfortunately, several employees fell victim to the fraudulent scheme. As soon as it detected this attack, the University contacted law enforcement and was directed to delay notification of potentially affected individuals until its investigation was complete. The University immediately engaged a leading forensic investigation firm to look into the matter and undertook enhancements to its already robust IT systems to block potential email exploitation, including a mass password reset of all employee Office 365 accounts.

What Information Was Involved

The University analyzed the entire contents of the impacted Office 365 accounts. The emails and attachments in the accounts contained, among other things, first and last names, dates of birth, home addresses, email addresses, telephone numbers, and social security numbers. In late March, April, and early May, the University identified emails containing personal information that may have been compromised by the attack. In mid-May, the University confirmed that your first and last name and social security number were contained in the impacted accounts. Please be assured that the investigation has not uncovered any evidence of actual misuse of your personal information.

What We Are Doing

Once the University discovered this attack, it took immediate steps to analyze and improve security and monitoring of its Office 365 accounts containing sensitive information. As part of the investigation and remediation efforts, the University also engaged a forensics team, other cybersecurity experts, law enforcement officers, and the attorney general's office. Although it appears that the risk of harm to you is minimal as a result of this incident, the University started working straightaway to notify impacted individuals once the investigation was complete and the results were communicated with law enforcement and other regulators.

Accordingly, to you and others who may have been inconvenienced by this unfortunate event, the University is offering, among other things, 24 months of complimentary credit monitoring and \$1 million in identity theft insurance. You may sign up for this service by following the instructions included in **Attachment A**.

What You Can Do

Regardless of whether you elect to receive credit monitoring and identity protection services, the University recommends that you remain vigilant in regularly reviewing and monitoring all account statements and credit histories to guard against any unauthorized transactions. If any suspicious or unusual activity is discovered, please contact your financial institution or call the number on the back of your payment card. **Attachment B** contains more details about steps you can take to protect against identity theft and fraud, including how to request a credit freeze or how to file a police report.

For More Information

First and foremost, we want to reinforce that keeping the personal information of our MSSU employees, candidates, students, and alumni safe and secure is of the utmost importance to us. We can assure you that as soon as we determined that some personal information may have been involved, we took swift action to address the issue and protect everyone who may have been affected. Anyone with questions regarding this incident is encouraged to contact the call center at (800) 395-3686, which is described in more detail in **Attachment A**. We sincerely regret that this incident occurred, and we apologize for any inconvenience that it may have caused.

Very truly yours,

Missouri Southern State University

ATTACHMENT A

The following services are available for 24 months from the date of enrollment:

MyIDCare™ Identity Protection Services: This service offers single bureau continuous credit monitoring through Experian, cyber scan dark web monitoring, fully managed recovery, \$1 million identity theft insurance and unlimited access to the ID Experts member service team. Additionally, ID Experts will provide complete restoration services to ensure that if you fall victim to identity theft or have any irregularities in your accounts an ICFE Certified Recovery Advocate will work on your behalf to remove all fraud from your records. Moreover, ID Experts will remediate all forms of identity theft, including medical identity theft.

To enroll in this service, you will need to contact ID Experts, our identity protection service provider. You may sign up online at <https://app.myidcare.com/account-creation/protect> or by phone by calling (800) 395-3686 using the enrollment code above, which may be activated through September 10, 2019. ID Experts representatives are available Monday through Friday from 7 am - 7 pm Central Time.

ATTACHMENT B

Provided below are names and contact information for the three major United States credit reporting agencies and additional information about steps you can take to: obtain a free credit report; to place a fraud alert, credit freeze, or credit lock on your credit report; and to protect your information. If you believe you are a victim of fraud or identity theft you should consider contacting your local law enforcement agency, your state's attorney general, or the Federal Trade Commission.

INFORMATION ON OBTAINING A FREE CREDIT REPORT

Residents of the United States are entitled to one free credit report annually from each of the three major credit reporting agencies. To order your free credit reports, visit www.annualcreditreport.com or call toll-free (877) 322-8228.

INFORMATION ON FRAUD ALERTS, CREDIT FREEZES AND CREDIT LOCKS

To place a fraud alert, credit freeze, or credit lock on your credit report, you must contact the one of the three credit reporting agencies below:

Equifax:
Consumer Fraud Division
P.O. Box 740256
Atlanta, GA 30374
1-888-766-0008
www.equifax.com

Experian:
Credit Fraud Center
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com

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

Fraud Alert: To place a fraud alert, contact any of the three major credit reporting agencies listed above and request that a fraud alert be put on your file. The agency that you contacted must notify the other two agencies. A fraud alert is free and lasts 90 days, but can be renewed. A fraud alert indicates to anyone requesting your credit file that you suspect you are a possible victim of fraud. A fraud alert does not impact your ability to get a loan or credit. Instead, it alerts a business that your personal information might have been compromised and requires that business to verify your identity before issuing you credit. Although this may cause some short delay if you are the one applying for the credit, it might protect against someone else obtaining credit in your name.

Credit Freeze: Unlike a fraud alert, you must place a credit freeze on your credit file with each credit reporting agency. A credit freeze prohibits the agency from releasing information from a credit report until it is lifted. When a credit freeze is in place, no one can open a new account. As a result, a credit freeze may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit, mortgages, employment, housing, or other services.

A credit freeze generally lasts until you lift or remove it, although in some jurisdictions it will expire after seven years. The cost to place a credit freeze is typically between \$5.00 and \$10.00 each time you place a freeze, but may vary by jurisdiction. (In Massachusetts, for example, you may be charged no more than \$5.00.) Certain jurisdictions may also permit a credit reporting agency to charge you similar fees to lift or remove the freeze. If you have been a victim of identity theft, and you provide the credit reporting agency with a valid police report, it cannot charge you to place, lift, or remove a credit freeze.

To place a credit freeze, contact the three credit reporting agencies listed above and provide the personal information required by each agency. Typically, this information will include: full name, with middle initial; social security number; date of birth; current address and previous addresses for the past five years; and applicable fee or incident report or complaint with a law enforcement agency. The request should also include a copy of a government-issued identification card, such as a driver's license, state, or military identification card, and a copy of a utility bill, bank, or insurance statement. Each copy should be legible, display your name and current mailing address, and the date of issue. The credit reporting agencies have three business days after receiving your request to place a credit freeze on your credit report. The credit bureaus must also send written confirmation to you within five business days.

To temporarily lift a credit freeze to allow a specific entity or individual access to your credit report, you must call or send a written request to the credit reporting agencies by mail and include proper identification (e.g., name, address, and social security number) and the personal identification number or password provided to you when you placed the credit freeze as well as the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have three business days after receiving your request to temporarily lift the credit freeze for those identified entities or for the specified period of time.

To remove a credit freeze, you must send a written request to each of the three credit bureaus by mail and include proper identification (e.g., name, address, and social security number) and the personal identification number or password provided to you when you placed the credit freeze. The credit bureaus have three business days after receiving your request to remove the freeze.

Credit Lock: Like a credit freeze, a credit lock restricts access to your credit report and prevents anyone from opening an account until unlocked. Unlike credit freezes, your credit can typically be unlocked online without delay. To lock your credit, contact all three credit reporting agencies listed above and complete a credit lock agreement. The cost of a credit lock varies by agency, which typically charges monthly fees.

ADDITIONAL STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

Review Your Account Statements: Carefully review your bank, credit card, and other account statements every month to ensure that all of your account activity is valid. Report any questionable charges promptly and in writing to the card or account issuer.

Check Your Credit Report: Check your credit report periodically to ensure that all your information is correct. You can obtain a free credit report once per year by visiting www.annualcreditreport.com or by calling (877) 322-8228. Carefully reviewing your credit report can help you spot problems and address them quickly. If you have any questions about your credit report or notice any inaccuracies, contact the relevant consumer reporting agency promptly at the telephone number listed on the report.

Obtain or File a Police Report: Certain jurisdictions (e.g., Massachusetts) give you the right to obtain any police report filed with respect to this incident. You also have the right to file a police report and obtain a copy of it if you are the victim of identity theft.

Contact the Office of the State Attorney General: You may contact the Office of the State Attorney General at the contact information found in [Attachment C](#).

Consult the Federal Trade Commission: You may also contact the United States Federal Trade Commission ("FTC") for further information on fraud alerts, credit freezes, credit locks, and how to protect yourself from identity theft. The FTC can be contacted at 400 7th St. SW, Washington, DC 20024; telephone 1-877-382-4357; or www.consumer.gov/idtheft.

ATTACHMENT C

State Attorneys General Contact List

Alabama
501 Washington Avenue
P.O. Box 300152
Montgomery, AL 36130-0152
(334) 242-7300
<http://www.ago.state.al.us/>

Alaska
1031 W. 4th Avenue, Suite 200
Anchorage, AK 99501-1994
(907) 269-5602
<http://www.law.state.ak.us/index.html>

Arizona
1275 W. Washington Street
Phoenix, AZ 85007
(602) 542-4266
<http://www.azag.gov/>

Arkansas
323 Center St., Suite 200
Little Rock, AR 72201-2610
(800) 482-8982
<http://www.ag.arkansas.gov/>

California
1300 I St., Suite 1740
Sacramento, CA 95814
(916) 445-9555
<http://ag.ca.gov/>

Colorado
1300 Broadway, 10th Floor
Denver, CO 80203
(720) 508-6000
<http://www.coloradoattorneygeneral.gov/>

Connecticut
55 Elm Street
Hartford, CT 06106
(860) 808-5318
<http://www.ct.gov/ag/>

Delaware
820 N. French Street
Wilmington, DE 19801
(302) 577-8400
<http://attorneygeneral.delaware.gov/>

District of Columbia
441 4th Street, NW, Suite 1100S
Washington, DC 20001
(202) 727-3400
<http://oag.dc.gov/>

Florida
The Capitol, PL 01
Tallahassee, FL 32399-1050
(850) 414-3300
<http://myfloridalegal.com/>

Georgia
40 Capitol Square, SW
Atlanta, GA 30334-1300
(404) 656-3300
<http://law.ga.gov/>

Hawaii
425 Queen Street
Honolulu, HI 96813
(808) 586-1500
<http://ag.hawaii.gov/>

Idaho
700 W. Jefferson Street, Suite 210
P.O. Box 83720
Boise, ID 83720-1000
(208) 334-2400
<http://www.ag.idaho.gov/>

Illinois
100 W. Randolph Street
Chicago, IL 60601
(312) 814-3000
<http://illinoisattorneygeneral.gov/>

Indiana
302 West Washington Street, 5th Floor
Indianapolis, IN 46204
(317) 232-6201
<http://www.in.gov/attorneygeneral/>

Iowa
1305 E. Walnut
Des Moines, IA 50319
(515) 281-5164
http://www.iowaattorneygeneral.gov

Kansas
120 S.W. 10th Avenue, 2nd Floor
Topeka, KS 66612-1597
(785) 296-2215
<https://www.ag.ks.gov/>

Kentucky
700 Capitol Avenue, Suite 118
Frankfort, KY 40601
(502) 696-5300
<http://ag.ky.gov/>

Louisiana
P.O. Box 94095
Baton Rouge, LA 70804-4095
(225) 326-6000
<http://www.ag.state.la.us/>

Maine
State House Station 6
Augusta, ME 04333
(207) 626-8800
<http://www.maine.gov/ag/>

Maryland
200 St. Paul Place
Baltimore, MD 21202-2202
(410) 576-6300
<http://www.marylandattorneygeneral.gov/>

Massachusetts
1 Ashburton Place
Boston, MA 02108-1698
(617) 727-2200
<https://www.mass.gov/orgs/office-of-attorney-general-maura-healey>

Michigan
P.O. Box 30212
525 W. Ottawa Street
Lansing, MI 48909-0212
(517) 373-1110
<http://www.michigan.gov/ag>

Minnesota
75 Dr. Martin Luther King, Jr.
Boulevard, Suite 102
Saint Paul, MN 55155
(651) 296-3353 or 1-800-657-3787 |
TTY: (651) 297-7206 or 1-800-366-4812
<http://www.ag.state.mn.us/>

Mississippi
Department of Justice
P.O. Box 220
Jackson, MS 39205
(601) 359-3680
<http://www.ago.state.ms.us/>

Missouri
207 W. High Street
Jefferson City, MO 65101
(573) 751-3321
<http://ago.mo.gov/>

Montana
215 N. Sanders
Helena, MT 59620-1401
(406) 444-2026
<https://doj.mt.gov/>

Nebraska
State Capitol
P.O. Box 98920
Lincoln, NE 68509-8920
(402) 471-2682
<http://www.ago.ne.gov/>

Nevada
100 N. Carson Street
Carson City, NV 89701
(775) 684-1100
<http://ag.nv.gov/>

New Hampshire
33 Capitol Street
Concord, NH 03301
(603) 271-3658
<https://www.doj.nh.gov/index.htm>

New Jersey
25 Market Street
P.O. Box 080
Trenton, NJ 08625
(609) 292-8740
<http://nj.gov/oag/newsreleases18/pr20180116a.html>

New Mexico
P.O. Drawer 1508
Santa Fe, NM 87504-1508
(505) 490-4060
<https://www.nmag.gov/>

New York
The Capitol, 2nd Floor
Albany, NY 12224
(518) 474-7330
<http://www.ag.ny.gov/>

North Carolina
P.O. Box 629
Raleigh, NC 27602-0629
(919) 716-6400
<http://www.ncdoj.gov/>

North Dakota
600 E. Boulevard Avenue
Bismarck, ND 58505-0040
(701) 328-2210
<http://www.ag.state.nd.us>

Ohio
30 E. Broad Street
Columbus, OH 43266-0410
(614) 466-4320
<http://www.ohioattorneygeneral.gov/>

Oklahoma
313 NE 21st Street
Oklahoma City, OK 73105
(405) 521-3921
<http://www.oag.state.ok.us/>

Oregon
1162 Court Street, NE
Salem, OR 97301
(503) 378-6002
<http://www.doj.state.or.us/>

Pennsylvania
Strawberry Square, 16th Floor
Harrisburg, PA 17120
(717) 787-3391
<https://www.attorneygeneral.gov/>

Puerto Rico
Ave. José De Diego, Pda. 22
Minillas Government Center
Torre Norte Building, 7th Floor
San Juan, PR 00940
(787) 722-7555
<http://daco.pr.gov/>

Rhode Island
150 S. Main Street
Providence, RI 02903
(401) 274-4400
<http://www.riag.ri.gov/>

South Carolina
Rembert C. Dennis Office Building
P.O. Box 11549
Columbia, SC 29211-1549
(803) 734-3970
<http://www.scag.gov/>

South Dakota
1302 East Highway 14, Suite 1
Pierre, SD 57501-8501
(605) 773-3215
<http://atg.sd.gov/>

Tennessee
425 5th Avenue North
Nashville, TN 37243
(615) 741-3491
<http://www.tn.gov/attorneygeneral>

Texas
Capitol Station
P.O. Box 12548
Austin, TX 78711-2548
(512) 463-2100
<https://www.texasattorneygeneral.gov/>

Utah
State Capitol, Room 236
Salt Lake City, UT 84114-0810
(801) 538-9600
<http://attorneygeneral.utah.gov/>

Vermont
109 State Street
Montpelier, VT 05609-1001
(802) 828-3173
<http://ago.vermont.gov/>

Virginia
202 North Ninth Street
Richmond, VA 23219
(804) 786-2071
<http://www.oag.state.va.us/>

Washington
1125 Washington Street SE
P.O. Box 40100
Olympia, WA 98504-0100
(360) 753-6200
<http://www.atg.wa.gov>

West Virginia
1900 Kanawha Boulevard, E
Charleston, WV 25305
(304) 558-2021
<http://www.wvago.gov/>

Wisconsin
State Capitol, Room 114 East
P. O. Box 7857
Madison, WI 53707-7857
(608) 266-1221
<http://www.doj.state.wi.us>

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State Capitol Building
Cheyenne, WY 82002
(307) 777-7841
<http://attorneygeneral.state.wy.us>