



150 N. Riverside Plaza, Suite 3000, Chicago, IL 60606 • (312) 819-1900

June 15, 2020

Bruce A. Radke
(312) 463-6211
(312) 819-1910 Direct Fax
bradke@polsinelli.com

VIA E-MAIL (ATTORNEYGENERAL@DOJ.NH.GOV)
AND FEDERAL EXPRESS

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

**Re: Notification of a Computer Security Incident Involving Personal
Information Pursuant to N.H. Rev. Stat. § 359-C:20**

Dear Attorney General MacDonald:

We represent New Horizons Credit Union (“NHCU”) in connection with an incident that may have impacted the personal information of two (2) New Hampshire residents, and provide this notice on behalf of NHCU pursuant to N.H. Rev. Stat. § 359-C:20(I)(b). This notice will be supplemented, if necessary, with any new significant facts discovered subsequent to its submission. While NHCU is notifying you of this incident, NHCU does not waive any rights or defenses relating to the incident or this notice, or the applicability of New Hampshire law on personal jurisdiction.

NATURE OF THE SECURITY INCIDENT OR UNAUTHORIZED ACCESS

NHCU has learned that, on August 7, 2019, a third party accessed a number of its employees’ email accounts without authorization. Upon learning of the incident, NHCU promptly secured the email accounts to prevent further access. NHCU also retained a leading forensic security firm to investigate the incident and confirm the security of its email and computer systems.

After identifying the scope of the incident, NHCU worked with a document review vendor to conduct a programmatic review of the contents of the impacted accounts, and then manually review the items identified as potentially at risk by that programmatic review. Due to the scope of the incident and the amount of data involved, this process took a considerable amount of time. On April 8, 2020, NHCU determined the identity of the impacted individuals. It then worked to identify addresses for those individuals and update the addresses based on the National Change of Address database. This research resulted in NHCU determining that the email account contained the personal information of two (2) New Hampshire residents. The impacted

polsinelli.com

Atlanta Boston Chicago Dallas Denver Houston Kansas City Los Angeles Nashville New York Phoenix
St. Louis San Francisco Washington, D.C. Wilmington
Polsinelli PC, Polsinelli LLP in California

June 15, 2020

Page 2

information varies by individual but may have included an individual's name, address, date of birth, phone number, Social Security number, and financial account number.

After determining the individuals who were impacted, NHCU worked to identify their contact information and worked with a mailing vendor to notify the individuals. At this point, NHCU is not aware of any fraud or identity theft to any individual as a result of this incident. Nor does it believe that accessing the contents of the email accounts was the motive behind the incident, and cannot confirm if any personal information was actually obtained by an unauthorized person. Nevertheless, because an email account was compromised and NHCU cannot isolate exactly what, if any, information may have been obtained, NHCU is notifying individuals whose personal information could have been accessed.

NUMBER OF NEW HAMPSHIRE RESIDENTS AFFECTED

NHCU has identified two (2) New Hampshire residents whose information may have been accessed by the unauthorized third party. NHCU started mailing notification letters to these individuals on June 15, 2020. Included in the notification was information on ways the individuals can protect themselves against potential fraud and identity theft, as well as a telephone number they can call if they have any questions regarding the incident. Individuals who had Social Security, driver's license, or passport numbers impacted also received an offer for one year of complimentary Experian IdentityWorks 3B credit monitoring and identity theft services. Enclosed is a sample of the notice that is being sent to the impacted individuals via first-class United States mail.

STEPS TAKEN RELATING TO THE INCIDENT

NHCU has also implemented steps to help prevent something like this from happening again, including strengthening email security. Lastly, NHCU is notifying the impacted individuals and providing them with information on how they can protect themselves against fraudulent activity and identity theft.

CONTACT INFORMATION

Please do not hesitate to contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,



Bruce A. Radke

Enclosure



NEW HORIZONS CREDIT UNION

Solutions for the Real World

Dear [REDACTED]

New Horizons Credit Union (“NHCU”) is committed to protecting the privacy of the information entrusted to us and takes this responsibility seriously. This commitment extends to notifying individuals when their personal information may be at risk. Although we have no reason to believe that your information has been used to commit fraud or identity theft, we are writing to make you aware of a recent email phishing incident that may have involved some of your personal information.

We discovered on August 7, 2019, that someone outside of NHCU temporarily accessed NHCU employee email accounts without authorization. We promptly contained the incident by securing the email accounts to prevent further access, conducted an internal investigation, and hired a leading forensic security firm to investigate the incident and confirm the security of our computer systems and network. This thoroughness required a manual, in-depth review to ensure each email and its content was examined to understand the full scope and mitigate any ramifications to your information.

Our investigation concluded on April 8, 2020 and determined that the phished email accounts contained some of your personal information. **At this point, we do not believe that the unauthorized third party’s motivation was to access your personal information contained within the email accounts and have no indication that any such information has been used for fraud or identity theft purposes.** Nonetheless, we are providing you with this notice because your personal information may have been contained in the phished email accounts.

The information contained in the relevant emails varied by individual but may have included your name, address, date of birth, Social Security number, driver’s license state and number, passport number, government issued ID number, tax ID number, digital signature, and/or financial information such as account number and credit card information, or limited medical information depending on the email content.

Again, we are not aware of any instances of fraud or identity theft. By reviewing your account information, you can help reduce potential fraud. Email fraud is on the rise with scammers pretending to be from New Horizons Credit Union. Never include personal information in any email that is not encrypted for security. Please know that we would never contact you to verify personal or account information.

For your peace of mind, we are offering a complimentary one-year membership to Experian IdentityWorkssm Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. For more information on IdentityWorks Credit 3B and how to activate your complimentary one-year membership, please see the additional information provided in this letter.

We take our responsibility to safeguard your personal information seriously and apologize for any inconvenience or concern this incident might cause. We are committed to taking steps to help prevent this from happening again, including reviewing our technical controls. **For further assistance, please call 1-844-963-2702 from 8:00 a.m. to 5:30 p.m., Central Time, Monday – Friday.**

Sincerely,

Edith G. Franklin

President/CEO

To help protect your identity, we are offering a **complimentary** one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. ENROLL by: [REDACTED] (Your code will not work after this date.)
2. VISIT the **Experian IdentityWorks website** to enroll: <https://www.experianidworks.com/3bcredit>
3. PROVIDE the 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. 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 CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and TransUnion files for indicators of fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

**Activate your membership today at <https://www.experianidworks.com/3bcredit>
or call 877-890-9332 to register with the activation code above.**

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-890-9332.

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

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Additional Important Information

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft. For more information and to contact the FTC, please visit www.ftc.gov/idtheft or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

Credit Reports: You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print a copy of the request form at <https://www.annualcreditreport.com/manualRequestForm.action>.

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is as follows:

Equifax 1-866-349-5191 www.equifax.com P.O. Box 740241 Atlanta, GA 30374	Experian 1-888-397-3742 www.experian.com P.O. Box 2002 Allen, TX 75013	TransUnion 1-800-888-4213 www.transunion.com P.O. Box 2000 Chester, PA 19016
---	--	--

Fraud Alerts: You may want to consider placing a fraud alert on your credit report. A fraud alert is free and will stay on your credit report for one (1) year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at www.annualcreditreport.com.

Credit and Security Freezes: You may have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:

Equifax Security Freeze 1-800-349-9960 www.equifax.com P.O. Box 105788 Atlanta, GA 30348	Experian Security Freeze 1-888-397-3742 www.experian.com P.O. Box 9554 Allen, TX 75013	TransUnion Security Freeze 1-888-909-8872 www.transunion.com P.O. Box 160 Woodlyn, PA 19094
---	--	---

Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting https://files.consumerfinance.gov/f/documents/bcfp_consumer-rights-summary_2018-09.pdf, or by requesting information in writing from the Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

Iowa Residents: Iowa residents can contact the Office of the Attorney General to obtain information about steps to take to avoid identity theft from the Iowa Attorney General's office at: Office of the Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines IA 50319, 515-281-5164.

Maryland Residents: Maryland residents can contact the Office of the Attorney General to obtain information about steps you can take to avoid identity theft from the Maryland Attorney General's office at: Office of the Attorney General, 220 St. Paul Place, Baltimore, MD 21202, (888) 743-0023.

North Carolina Residents: North Carolina residents can obtain information about preventing identity theft from the North Carolina Attorney General's office at: North Carolina Attorney General's Office, 9001 Mail Service Center, Raleigh, NC 27699-9001, (877) 566-7226.

New York State Residents: New York residents can obtain information about preventing identity theft from the New York Attorney General's office at: Office of the Attorney General for the State of New York, Bureau of Consumer Frauds & Protection, The Capitol, Albany, New York 12224-0341; <https://ag.ny.gov/consumer-frauds/identity-theft>; (800) 771-7755.

Rhode Island Residents: We believe that this incident affected 1 Rhode Island resident. Rhode Island residents can contact the Office of the Attorney General at: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, (401) 274-4400.

Vermont Residents: If you do not have internet access but would like to learn more about how to place a security freeze on your credit report, contact the Vermont Attorney General's office at 802-656-3183 (800-649-2424 toll free in Vermont only).