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JUL 27 2020

CONSUMER PROTECTION

Christopher J. DiIenno  
Office: (267) 930-4775  
Fax: (267) 930-4771  
Email: [cdiienno@mullen.law](mailto:cdiienno@mullen.law)

426 W. Lancaster Avenue, Suite 200  
Devon, PA 19333

July 22, 2020

**VIA U.S. MAIL**

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

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent Northeast Credit Union (“NECU”) located at 100 Borthwick Avenue, Portsmouth, New Hampshire 03801, and are writing to voluntarily notify your office of a security incident involving certain information relating to fifty-seven (57) New Hampshire residents. Although the information involved is not “personal information” and cannot in itself be used to conduct fraud, we are notifying the affected members, and your office, in an abundance of caution. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, NECU 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 June 30<sup>th</sup> 2020, an internal document was inadvertently sent to an email address outside of NECU’s organization. Upon discovery of this error that same day, steps were taken to recover the information and prevent this from happening again, including reviewing internal controls governing how information is sent electronically to other members in our organization.

The information that could have been subject to unauthorized access included NECU member name, loan number, address, member number, loan balance, payment, tax and insurance disbursement amounts.

**Notice to New Hampshire Residents**

[Mullen.law](http://Mullen.law)

On or about July 13, 2020, NECU provided written notice of this matter to affected individuals, which include fifty-seven (57) 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, NECU moved quickly to investigate and respond, confirm the security of NECU systems, and notify potentially affected individuals in an abundance of caution. NECU is also working to implement additional safeguards and training to its employees. NECU is providing access to credit monitoring services for twelve (12) months through Benefits Plus, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, NECU 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. NECU 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) 930-4775.

Very truly yours,



Christopher J. DiLenno of  
MULLEN COUGHLIN LLC

CJD/eeb  
Enclosure

# EXHIBIT A



[DATE]

[MEMBER NAME]

[STREET ADDRESS]

[CITY, STATE, ZIP]

Dear [Member Name],

We value your membership and respect the privacy of your information, which is why, as a precautionary measure, we are writing to let you know about an unintentional disclosure of information that involves your personal information.

On June 30<sup>th</sup>, 2020, an internal document that may have included your name, loan number, address, member number, loan balance, payment, tax and insurance disbursement amounts was inadvertently sent to an email address outside of our organization. Upon discovery of this error that same day, steps were taken to recover the information and prevent this from happening again, including revising our internal policies and procedures.

While we are unaware of any misuse of the information resulting from this incident, and while we believe the risk to your information from this incident is low, to minimize risk and for further security, we have enrolled you in one year of complimentary identity theft coverage services through our Benefits Plus® Identity Restoration Rescue® program. This service offers crucial assistance from licensed attorneys if you are ever the victim of fraud or theft of your identity. It also assists with legal matters, reporting, and other processes if you do fall victim to such a crime. Your coverage under this program is already in effect.

In addition, there are preventive actions you can take along with our efforts to further reduce risk to your information:

- Review the attached *Steps You Can Take To Protect Your Information*.





- Frequently review your account activity and balances for any erroneous charges or suspicious activity. Contact us immediately should anything look out of the ordinary.
- Keep your contact information up-to-date with us, in the event we need to contact you regarding potential fraud risk.
- Set up account alerts with Northeast Credit Union – with this service, you will receive an email or text alerts for deposit, withdrawal or balance changes in your account.
- Change your passwords to online accounts – create a strong password with a minimum of eight characters and a combination of upper- and lower-case letters, numbers, and symbols.
- Visit the Fraud Prevention section of our website for more tips and information: [necu.org/fraud](http://necu.org/fraud)

Please remember, Northeast Credit Union will never call, email or send a text message and ask you for your account numbers, PIN or other personal information. If you have any additional questions, concerns or need help, please feel free to contact **[Staff Name]**, Branch Manager, at our **[home branch]** branch at **[staff direct phone number]** or **[staff direct email]**.

We sincerely apologize for the inconvenience and assure you that your membership, and the trust you place on us, is our top priority.

Sincerely,

Northeast Credit Union Fraud & Security Team







## Steps You Can Take to Protect Your Information

### **Monitor Your Accounts**

We encourage you to remain vigilant against incidents of identity theft and fraud and to review your account statements and 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](http://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.

You have the right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

#### **Experian**

**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 160**

**Woodlyn, PA 19094**

**1-888-909-8872**

**[www.transunion.com/credit-  
freeze](http://www.transunion.com/credit-freeze)**

#### **Equifax**

**P.O. Box 105788**

**Atlanta, GA 30348-5788**

**1-800-685-1111**

**[www.equifax.com/personal/  
credit-report-services](http://www.equifax.com/personal/credit-report-services)**

In order to request a security freeze, you will need to provide the following information:





1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

**Experian**

P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/fraud/  
center.html](http://www.experian.com/fraud/center.html)

**TransUnion**

P.O. Box 2000  
Chester, PA 19016  
1-800-680-7289

[https://www.transunion.com/  
fraud-alerts](https://www.transunion.com/fraud-alerts)

**Equifax**

P.O. Box 105069  
Atlanta, GA 30348  
1-888-766-0008

[www.equifax.com/personal/  
credit-report-services](http://www.equifax.com/personal/credit-report-services)

**Additional Information**

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, 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](http://www.identitytheft.gov), 1-877-ID-THEFT (1-877-438-4338); 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. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

