

May 13, 2022

VIA E-MAIL (DOJ-CPB@DOJ.NH.GOV)

Attorney General John Formella
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Incident Notification

Dear Attorney General Formella:

We are writing on behalf of our client, Oakwood University, to notify your office of a cybersecurity incident that involved New Hampshire residents' personal information.

On March 14, 2022, Oakwood University detected a computer security incident which impacted the availability and functionality of its computer systems. Upon learning of the incident, Oakwood University took measures to secure its network, launched an investigation, and engaged a cybersecurity firm to assist. The investigation determined that an unauthorized party accessed Oakwood University's network between March 7, 2022 and March 14, 2022, and may have accessed certain files during that time. Some files pertained to the Healthcare Assistance Plan for Employees of Seventh-day Adventist Organization of the North American Division (the "Plan"), a health insurance plan in which Oakwood University is a participating employer. These contained the names, addresses, dates of birth, Social Security Numbers, member identification numbers, and/or limited claims information for Plan members.

On May 13, 2022, the Plan, through Plan participant, Oakwood University, provided written notice via United States Postal Service First Class mail to four (4) affected New Hampshire residents.¹ Recipients are being offered a complimentary one-year membership in credit monitoring and identity theft protection services. A dedicated, toll-free call center has also been established which individuals may contact to obtain more information regarding the incident.

To help prevent a similar incident from occurring in the future, Oakwood University has

¹ This notice does not waive any objection that New Hampshire lacks personal jurisdiction over Oakwood University regarding any claims related to this incident.

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and will continue to take steps to enhance existing security measures, including enhancing network security and continuing to train employees on data security.

Sincerely,

Kimberly C. Gordy
Partner

Enclosure



Return mail will be processed by: IBC
PO Box 847
Holbrook, NY 11741



May 13, 2022

Dear [REDACTED],

At the Healthcare Assistance Plan for Employees of Seventh-day Adventist Organization of the North American Division (the "Plan"), we are committed to protecting the privacy and security of your information. We are writing to let you know of a recent security incident that may have involved some of that information. This letter explains the incident, measures we have taken, and some steps you may consider taking in response.

What Happened? On March 14, 2022, Oakwood University detected a computer security incident which impacted the availability and functionality of its computer systems. Upon learning of the incident, Oakwood University took measures to secure its network, launched an investigation, and engaged a cybersecurity firm to assist. The investigation determined that an unauthorized party accessed Oakwood University's network between March 7, 2022 and March 14, 2022, and may have accessed certain files during that time.

What Information Was Involved? Some of the files that may have been accessed relate to the Plan. As a participating employer in the Plan, Oakwood University has access to limited Plan data regarding participating employees and their dependents so that it can carry out enrollment and other limited administration functions for the Plan. To facilitate the performance of these administration functions, Oakwood University downloaded some of this Plan data onto its network and we have identified files that contained your name, address, date of birth, Social Security Number, member identification number, and/or limited claims information. No information housed with the Plan Administrator has been exposed due to the incident.

What We Are Doing and What You Can Do. We are offering you a complimentary one-year membership with 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. IdentityWorks is completely free to you and enrolling in this program will not affect your credit score. **For more information on IdentityWorks, including instructions on how to activate your complimentary one-year membership, as well as additional steps you can take to protect your information, please see the pages that follow this letter.**

The Plan and Oakwood University have and will continue to take steps to enhance existing security measures to help prevent something like this from happening in the future, including enhancing network security and continuing to train employees on data security.

For More Information. We deeply regret that this incident occurred and any imposition to those affected. If you have any questions about this incident, please call 1-(866) 904-0403, Monday through Friday, 9:00 a.m. to 7:00 p.m., Eastern Time, excluding major U.S. holidays.

Sincerely,

James Winegardner
President | Chief Executive Officer
Plan Administrator (Adventist Risk Management, Inc.)

OAK-ADT-GEN

To help protect your identity, we are offering a **complimentary** one-year membership to Experian IdentityWorksSM. 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 In Three Easy Steps

1. ENROLL by: **8/6/2022** (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 that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-288-8057. 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 **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 file 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.
- **\$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 **877-288-8057** 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 877-288-8057.

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

** 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.

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. If you detect any suspicious or unrecognized activity on an account, you should promptly notify the financial institution or company with which the account is maintained.

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. This notification was not delayed as a result of a law enforcement investigation. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.identitytheft.gov

Credit Report: You may obtain a copy of your credit report, free of charge, once every 12 months from each of the four nationwide credit reporting companies. To order your annual free credit report from Equifax, Experian or TransUnion, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the four nationwide credit reporting companies is as follows:

Equifax

PO Box 740241
Atlanta, GA 30374

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

1-800-685-1111

Experian

PO Box 2002
Allen, TX 75013

[www.experian.com/consumer-products/
free-credit-report.html](http://www.experian.com/consumer-products/free-credit-report.html)

1-888-397-3742

TransUnion

PO Box 2000
Chester, PA 19016

www.transunion.com/annual-credit-report

1-800-916-8800

Innovis

PO Box 1689
Pittsburgh, PA 15230-1689

www.innovis.com/personal/creditReport

1-800-540-2505

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus identified below. A fraud alert is free. If you place a fraud alert with Equifax, Experian, or TransUnion, the credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. Equifax, Experian or TransUnion will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Equifax

PO Box 105069

Atlanta, GA 30348-5069

www.equifax.com/personal/credit-report-services/credit-fraud-alerts

1-800-525-6285

TransUnion

PO Box 2000

Chester, PA 19016

www.transunion.com/fraud-alerts

1-800-680-7289

Experian

PO Box 9554

Allen, TX 75013

www.experian.com/fraud/center.html

1-888-397-3742

Innovis Consumer Assistance

PO Box 26

Pittsburgh, PA 15230-0026

<https://www.innovis.com//fraudActiveDutyAlerts>

1-800-540-2505

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies using the information below:

Equifax Security Freeze

PO Box 105788

Atlanta, GA 30348

www.equifax.com/personal/credit-report-services/credit-freeze

1-800-298-0045

TransUnion Security Freeze

PO Box 160

Woodlyn, PA 19014

www.transunion.com/credit-freeze

1-888-909-8872

Experian Security Freeze

PO Box 9554

Allen, TX 75013

www.experian.com/freeze/center.html

1-888-397-3742

Innovis

PO Box 26

Pittsburgh, PA 15230-0026,

www.innovis.com/personal/securityFreeze

1-800-540-2505

In order to request a security freeze, you will need to provide some or all of the following information to the credit bureaus, depending on whether you do so online, by phone, or by mail (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. 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.

The credit bureaus have one business day after receiving your request by toll-free telephone or secure electronic means, or up to three business days after receiving your request by mail, to place a security freeze on your credit report. After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all credit bureaus.

Plan Administrator: You may contact the *Plan Administrator* (Adventist Risk Management, Inc.) via U.S. mail at 12501 Old Columbia Pike, Silver Spring, MD 20904 or via telephone at (888) 951-4276.

Additional Information for Residents of the Following States

Iowa: You are advised to report suspected incidents of identity theft to law enforcement or the Iowa Attorney General's Office at Office of the Attorney General of Iowa, Consumer Protection Division, Hoover State Office Building, 1305 East Walnut Street, Des Moines, IA 50319, www.iowaattorneygeneral.gov, Telephone: 1-515-281-5926 or 1-888-777-4590.

Maryland: You may contact and obtain information about avoiding identity theft from your state attorney general at: Maryland Attorney General's Office, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us

New York: You may contact and obtain information about security breach response and identity theft prevention and protection from these state agencies:

- New York Department of State Division of Consumer Protection, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>
- New York State Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>
- New York State Police, 1220 Washington Ave, Bldg. 22, Albany NY, 12226, 1-518-457-6721, <http://troopers.ny.gov/>

North Carolina: You may contact and obtain information about avoiding identity theft from your state attorney general at: North Carolina Attorney General's Office, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov

Rhode Island: This incident involves 1 individual in Rhode Island. Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information about avoiding identity theft from your state attorney general at: Rhode Island Attorney General's Office, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov

West Virginia: You have the right to ask that nationwide consumer reporting agencies place "fraud alerts" in your file to let potential creditors and others know that you may be a victim of identity theft, as described above. You also have a right to place a security freeze on your credit report, as described above.