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June 19, 2017

RECEIVED

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CONSUMER PROTECTION

**VIA U.S. MAIL**

Attorney General Gordon J. MacDonald  
New Hampshire Department of Justice  
Office of the Attorney General  
33 Capitol St.  
Concord, NH 03301

Dear Attorney General MacDonald:

Pursuant to N.H. Rev. Stat. § 359-C:20(1)(b), I write to advise you that Occidental College recently experienced a data breach involving unauthorized access to certain personal and account information of some of its students and employees. The incident affected the information of approximately 4 New Hampshire residents whose personal information as defined in the statute may have been accessed.

**Information Regarding the Unauthorized Access**

The College recently discovered that an unauthorized person may have gained access to a computer file containing a limited amount of personally identifiable information. The file in question included student and employee names, Occidental College ID numbers, and encoded data associated with those numbers that enables College ID cards to function as on-campus debit cards. The file did NOT include Social Security numbers, driver's license or other state-issued ID numbers, financial information (such as credit card or banking information), or other sensitive personal data.

Though unlikely and technically difficult, the data that may have been acquired could be used to replicate Occidental College ID cards, which then possibly could be used to purchase food or other products from the College. It is important to note, however, that this data is different from data that allows physical access to campus buildings. For this reason, even if someone were to replicate Occidental College ID cards with this data, they will not be able to physically access any campus building with such cards.

**Steps Taken In Response to Discovery of the Breach**

Occidental College promptly conducted an internal investigation upon discovery of the breach. Based on this investigation, the College has concluded that the incident

was isolated and unlikely to result in further incidents of a similar nature. Nevertheless, the College is increasing account activity monitoring to detect potential fraud involving Occidental College ID cards. If the College discovers such fraud, it will notify the affected Occidental College ID user, reimburse the user for the full value of goods purchased through fraudulent activity, and reprogram the user's Occidental College ID card.

**Communication with Affected Individuals**

Pursuant to N.H. Rev. Stat. § 359-C:20(1)(a), Occidental College is promptly notifying its employees and students whose personal information may have been exposed about the unauthorized access. Occidental College is sending these notices via U.S. First Class Mail on or about June 19, 2017. A form copy of the notification is enclosed with this letter.

Best regards,

Handwritten signature of Rachel S. Cronin in black ink.

Rachel S. Cronin



Monday, June 19, 2017

## Notice of Data Breach

Dear Occidental Community Member,

We value you as a member of the Occidental community and respect the privacy of your information, which is why, as a precautionary measure, we are writing to let you know about a data security incident that may involve your personal information.

### **What Happened?**

The college has reason to believe that on or around June 1, 2017, an unauthorized person may have gained access to a computer file containing a limited amount of personally identifiable information. The college has conducted a thorough investigation into what happened.

### **What Information Was Involved?**

The file in question included names, Oxy ID numbers and associated encoded data that enables Oxy ID cards to function as on-campus debit cards. The file did NOT include Social Security numbers, driver's license or other state-issued ID numbers, financial information (such as credit card or banking information), or other sensitive personal data.

Though unlikely and technically difficult, the data that may have been acquired could be used to replicate Oxy ID cards, which possibly could be used to purchase food or other products from the college. Please note, however, that this data is different from data that allows physical access to campus buildings. For this reason, even if someone were to replicate Oxy ID cards with this data, they will not be able to physically access any campus building with such cards.

### **What We Are Doing**

We have investigated the incident and concluded that it is isolated and we are unlikely to see further incidents of a similar nature. Nevertheless, we are increasing monitoring of account activity to look for potential fraud involving Oxy ID cards. If we discover such fraud, we will notify the affected Oxy ID user, reimburse the user for the full value of goods purchased through fraudulent activity, and reprogram the user's Oxy ID card.

### **What You Can Do**

We have no evidence that your personal information was or will be misused in any way. However, we ask that you notify us if you see any unusual or potentially fraudulent activity related to your Oxy ID card funds. You can review your Oxy ID account funds by going to <https://get.cbord.com/oxy/full/login.php>. If demonstrated fraudulent activity occurs on your account, we will reimburse you upon notice and review. In this unlikely event, the college will also reprogram your Oxy ID card. You can request that the college reprogram your Oxy ID card as a preventative measure by contacting the Card Office at (323) 341-4885 or [cardoffice@oxy.edu](mailto:cardoffice@oxy.edu).

### **For More Information**

If you have any questions about your Oxy ID card, please contact the Card Office at (323) 341-4885 or [cardoffice@oxy.edu](mailto:cardoffice@oxy.edu). For all other questions, please contact James Uhrich,

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Chief Information Officer and Associate Vice President for Information Technology Services, at (323) 259-2506 or [uhrich@oxy.edu](mailto:uhrich@oxy.edu).

### **Additional Information**

Although your Oxy ID account does not directly affect your credit score, some state regulations require us to advise you to remain vigilant by reviewing account statements and monitoring free credit reports. You may obtain a free copy of your credit report online at [www.annualcreditreport.com](http://www.annualcreditreport.com), by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at [www.annualcreditreport.com](http://www.annualcreditreport.com)) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

**Equifax:** P.O. Box 740241, Atlanta, Georgia 30374-0241, 1-800-685-1111, [www.equifax.com](http://www.equifax.com)

**Experian:** P.O. Box 9532, Allen, TX 75013, 1-888-397-3742, [www.experian.com](http://www.experian.com)

**TransUnion:** P.O. Box 1000, Chester, PA 19022, 1-800-888-4213, [www.transunion.com](http://www.transunion.com)

We recommend that you remain vigilant with respect to reviewing your account statements and credit reports, and promptly report any suspicious activity to the proper law enforcement authority, including local law enforcement, your state's attorney general and/or the Federal Trade Commission ("FTC"). You may contact the FTC or your state's regulatory authority to obtain additional information about avoiding identity theft.

#### **Federal Trade Commission, Identity Theft Clearinghouse**

600 Pennsylvania Avenue, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), [www.identitytheft.gov](http://www.identitytheft.gov) and [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)

### **State Specific Information**

**For residents of Maryland:** You may also obtain information about preventing and avoiding identity theft from the Maryland Office of the Attorney General:

**Maryland Office of the Attorney General**, Consumer Protection Division  
200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023,  
[www.oag.state.md.us/idtheft/index.htm](http://www.oag.state.md.us/idtheft/index.htm)

*Or contact the Identity Theft Unit directly:*

2000 St. Paul Place, 16th Floor, Baltimore, MD 21202, 410-567-6491

**For residents of Massachusetts:** You also have the right to obtain a police report.

**For residents of North Carolina:** You may also obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office:

**North Carolina Attorney General's Office**, Consumer Protection Division  
9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, [www.ncdoj.gov](http://www.ncdoj.gov)

## **Occidental College**

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**For residents of Oregon:** Please report suspected identity theft to law enforcement, including the Federal Trade Commission (contact information above) and the Oregon Attorney General's Office:

**Oregon Attorney General's Office**, Consumer Protection Division  
1162 Court Street NE, Salem, OR 97301-4096, 1-877-877-9392,  
[www.doj.state.or.us/consumer/](http://www.doj.state.or.us/consumer/)

**For residents of Vermont:** You may learn helpful information about fighting identity theft, placing a security freeze, and obtaining a free copy of your credit report on the Vermont Attorney General's website at <http://www.atg.state.vt.us>.

**For residents of Wyoming:** This notification was not delayed as a result of any law enforcement investigation.

**You also may wish to freeze your credit.**

You may have the right to put 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 a 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. In addition, you may incur fees to place, lift and/or remove a credit freeze. Credit freeze laws vary from state to state. 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 security freeze. In other situations, the cost of placing, temporarily lifting, and removing a credit freeze also varies by state, generally \$5 to \$20 per action at each credit reporting company. *Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company.*

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: P.O. Box 105788, Atlanta, GA 30348, [www.equifax.com](http://www.equifax.com)

Experian: P.O. Box 9554, Allen, TX 75013, [www.experian.com](http://www.experian.com)

TransUnion LLC: P.O. Box 2000, Chester, PA, 19022-2000, [freeze.transunion.com](http://freeze.transunion.com)

The credit reporting agencies have three business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five business days and provide you with a unique personal identification number (PIN) or password, or both that can be used by you to authorize the removal or lifting of the security freeze. You can obtain more information about fraud alerts and credit freezes by contacting the FTC or one of the national credit reporting agencies listed above.

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