

STATE OF NH  
DEPT OF JUSTICE  
UNIVERSITY OF NH

# KAPLAN PROFESSIONAL

November 6, 2018

New Hampshire Department of Justice  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

Re: Legal Notice of Information Security Breach Pursuant to N.H. Rev. Stat. Ann. § 359-C:19 *et seq.*

To Whom It May Concern:

In accordance with the above-referenced provision of New Hampshire law, I write to inform you of an information security incident affecting approximately 23 New Hampshire residents. This letter serves as an update to our prior notification to you regarding this incident, dated October 3, 2018.

As explained in our prior letter, during routine security monitoring of the PPI website (ppi2pass.com), we found indications of suspicious activity and immediately launched an investigation. On September 19, 2018, our investigation initially determined that a hacker had implemented malicious code that allowed the hacker to obtain access in June 2017 to personal information that was submitted in connection with transactions made on the website between March 9, 2017 and April 5, 2017.

Upon learning of the incident, PPI took immediate steps to protect consumers by investigating the incident, eliminating and preventing any further unauthorized access, and enhancing our security and monitoring measures. As part of our investigation and remediation work, we have also brought in a leading third-party forensics firm and contacted law enforcement. Upon determining that the attack may have resulted in access to certain personal information, we also started working immediately to notify potentially impacted customers and offer assistance, including arranging for free credit monitoring.

On October 4, 2018, we notified, via U.S. mail, those affected individuals whose personal information was accessed in June 2017. A sample copy of this notification letter was enclosed with our prior notification to you.

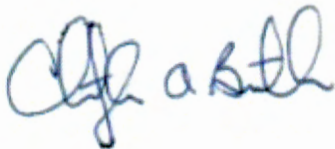
After we sent these notifications, our investigation continued. On October 11, 2018, we determined that in September 2017, the hacker likely accessed additional personal information that was submitted in connection with certain transactions made on the website between June 11 and September 3, 2017. The personal information that was likely accessed during both periods may have included name, physical address, email address, phone number, and credit or debit

card information (e.g. card number, expiration date, and Card Verification Value (“CVV”) or Card Security Value (“CSV”)). At this time, we believe that our investigation into this incident has concluded.

Enclosed is a copy of the notification letter that will be sent via first-class mail on November 7, 2018 to individuals whose personal information was accessed in September 2017. As indicated in the attachment, the notification to individuals includes: (1) a description of the incident and the type of personal information at issue; (2) the actions taken by PPI to protect personal information from further unauthorized access; (3) PPI’s address and a toll-free phone number to call for further information and assistance; (4) information on how the individual may enroll in free credit monitoring and other complimentary services arranged by PPI; (5) information about how to place a fraud alert or security freeze on a credit report; (6) the toll-free numbers and addresses for the major consumer reporting agencies; (7) the toll-free number, address, and website for the Federal Trade Commission; and (8) advice that directs the individual to remain vigilant by reviewing account statements and monitoring free credit reports.

If you have any questions or need further information regarding this incident, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. Butler".

Christopher A. Butler  
Senior Counsel, Kaplan Professional  
102 Jay Street  
La Crosse, WI 54601  
christopher.butler@kaplan.com  
(608) 779-5599, Ext 2826  
Enclosure



JOHN Q. SAMPLE  
1234 MAIN STREET  
ANYTOWN US 12345-6789

November 7, 2018

## NOTICE OF DATA BREACH

We are contacting you regarding an incident through which some of the personal information you provided in connection with transactions on the PPI website (ppi2pass.com) may have been disclosed to a third party.

### What Happened?

During routine security monitoring of the PPI website, we found indications of suspicious activity and immediately launched an investigation. On September 19, 2018, our investigation determined that a hacker had implemented malicious code that allowed the hacker to obtain access in June 2017 to personal information that was submitted in connection with certain transactions made on the website between March 9 and April 5, 2017. We immediately began efforts to identify and notify affected individuals and sent notifications to these individuals in October 2018, which may have included you.

As the investigation continued, we identified that the hacker likely accessed additional personal information. On October 11, 2018, our investigation specifically determined that in September 2017, the hacker also obtained access to personal information, including yours, which was submitted in connection with certain transactions made on the website between June 11 and September 3, 2017.

### What Information Was Involved?

The personal information that was likely accessed may have included name, physical address, email address, phone number, and credit or debit card information (e.g. card number, expiration date, and Card Verification Value ("CVV") or Card Security Value ("CSV")).

### What Are We Doing?

The security of our customers' personal information is a top priority for PPI. Upon learning of this incident, we took immediate steps to investigate the incident, eliminate and prevent any further unauthorized access, and to enhance our security and monitoring measures. We have also brought in a leading third party forensic investigation firm to assist in these efforts and contacted law enforcement. Upon determining that the attack may have resulted in access to certain personal information, we also started working immediately to notify potentially impacted customers.

We are offering you and other affected customers two years of complimentary credit monitoring and identity protection service. You may sign up for this service by following the instructions included in **Attachment A**.

### What Can You Do?

Regardless of whether you elect to enroll in the identity-theft protection service, we strongly recommend that you remain vigilant and regularly review and monitor all of your credit history to guard against any unauthorized transactions or activity. We also recommend that you closely monitor your account statements and notify your financial institution if you suspect any unauthorized activity. **Attachment B** contains more information about steps you can take to protect yourself against fraud and identity theft.



**For More Information.**

Please be assured that we are taking steps to address the incident and to protect the security of your data. If you have any questions about this notice or the incident, please feel free to contact our assistance line at 1-855-725-5777, Monday through Saturday from 8:00 a.m. to 8:00 p.m. Central Time.

We sincerely regret that this incident occurred, and we apologize for any inconvenience that may have been caused by this incident.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'P' followed by a horizontal line that tapers to the right.

Patty Steinhardt  
President, PPI  
1250 Fifth Avenue, Belmont, CA 94002

**ATTACHMENT A**

As an added precaution, we have arranged to have AllClear ID protect your identity for 24 months at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next 24 months.

**AllClear Identity Repair:** This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-725-5777 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

**AllClear Fraud Alerts with Credit Monitoring:** This service offers the ability to set, renew, and remove 90-day fraud alerts on your credit file to help protect you from credit fraud. In addition, it provides credit monitoring services, a once annual credit score and credit report, and a \$1 million identity theft insurance policy. To enroll in this service, you will need to provide your personal information to AllClear ID. You may sign up online at [enroll.allclearid.com](http://enroll.allclearid.com) or by phone by calling 1-855-725-5777 using the following redemption code: Redemption Code.

Please note: Following enrollment, additional steps are required by you in order to activate your phone alerts and fraud alerts, and to pull your credit score and credit file. Additional steps may also be required in order to activate your monitoring options.

**Opt-out Policy**

If for any reason you wish to have your information removed from the eligibility database for AllClear Identity Repair, please contact AllClear ID:

<b>E-mail</b> support@allclearid.com	<b>Mail</b> AllClear ID, Inc. 823 Congress Avenue Suite 300 Austin, Texas 78701	<b>Phone</b> 1.855.434.8077
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## **ATTACHMENT B**

### **ADDITIONAL INFORMATION**

To protect against possible fraud, identity theft or other financial loss, we encourage you to remain vigilant, to review your account statements and to monitor your credit reports. Provided below are the names and contact information for the three major U.S. credit bureaus and additional information about steps you can take to obtain a free credit report, and place a fraud alert or security freeze on your credit report. 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**

U.S. residents are entitled under U.S. law to one free credit report annually from each of the three major credit bureaus. To order your free credit reports, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll-free (877) 322-8228.

#### **INFORMATION ON IMPLEMENTING A FRAUD ALERT, CREDIT FREEZE, OR CREDIT LOCK**

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

Equifax:  
Consumer Fraud Division  
P.O. Box 740256  
Atlanta, GA 30374  
1-888-766-0008  
[www.equifax.com](http://www.equifax.com)

Experian:  
Credit Fraud Center  
P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com](http://www.experian.com)

TransUnion:  
TransUnion LLC  
P.O. Box 2000  
Chester, PA 19016-2000  
1-800-680-7289  
[www.transunion.com](http://www.transunion.com)

**Fraud Alert:** Consider contacting the three major credit reporting agencies at the addresses below to place a fraud alert on your credit report. 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 affect 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.

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.

**Credit Freeze:** A credit freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report until the freeze is lifted. When a credit freeze is in place, no one—including you—can open a new account. As a result, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit, mortgages, employment, housing, or other services.

To place a credit freeze, contact all three credit reporting agencies listed above and provide the personal information required by each agency to place a freeze, which may include:

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, 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, a copy of either a police report, investigative report, or complaint to a law enforcement agency concerning identity theft; and
8. If you are not a victim of identity theft, payment by check, money order, or credit card (Visa, MasterCard, American Express, or Discover only). Do not send cash through the mail.

When you place a credit freeze, you will be provided a PIN to lift temporarily or remove the credit freeze. 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. 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.

**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.

You may also contact the U.S. 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](http://www.consumer.gov/idtheft).

### ADDITIONAL RESOURCES

Your state Attorney General may also have advice on preventing identity theft, and you should report instances of known or suspected identity theft to law enforcement, your State Attorney General, or the FTC.

**Maryland Residents:** The Attorney General can be contacted at Office of Attorney General, 200 St. Paul Place, Baltimore, MD 21202; (888) 743-0023; or <http://www.marylandattorneygeneral.gov/>.

**Massachusetts Residents:** Under Massachusetts law, you have the right to obtain any police report filed in connection to the incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

**North Carolina Residents:** The Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001; (919) 716-6400; or <http://www.ncdoj.gov>.

**New Mexico Residents:** You have rights under the federal Fair Credit Reporting Act (FCRA), which governs the collection and use of information pertaining to you by consumer reporting agencies. For more information about your rights under the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf> or [www.ftc.gov](http://www.ftc.gov).

**Rhode Island Residents:** The Attorney General can be contacted at (401) 274-4400 or <http://www.riag.ri.gov/>. You may also file a police report by contacting local or state law enforcement agencies.

