

June 13, 2017

<u>VIA E-MAIL (ATTORNEYGENERAL@DOJ.NH.GOV)</u> <u>AND FEDERAL EXPRESS</u>

The Honorable Joseph Foster Attorney General of the State of New Hampshire Office of the Attorney General 33 Capitol Street Concord, NH 03301

Re: Notification of a Computer Security Incident

Dear Attorney General Foster:

We represent Provident Credit Union ("Provident"). Provident is reporting a potential unauthorized disclosure of unencrypted computerized data containing the personal information of eleven (11) New Hampshire residents pursuant to N.H. REV. STAT. ANN. § 359-C:20.

The investigation of this incident is ongoing, and this notice will be supplemented, if necessary, with any significant new facts discovered subsequent to its submission. By providing this notice, Provident does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction in connection with this incident.

Background of the Incident

Provident (providentcu.org), was established in 1950 to serve the California Teachers Association. Headquartered in the San Francisco Bay Area, Provident now serves more than 100,000 members from over 1,200 employer groups and maintains branches throughout California.

Provident was advised by a third-party vendor, Creditors Specialty Services, Inc. ("CSS"), that a CSS sales representative sent an e-mail on March 3, 2017 to the former president of CSS. The e-mail contained certain sensitive information of Provident's members along with several other of CSS's customers.

Provident had retained CSS to assist Provident in connection with certain functions of the credit union's business operations, including collecting on outstanding debts owed to Provident. Since being notified of this incident, Provident has terminated its relationship with CSS.

Upon being notified of the incident, Provident promptly launched an internal investigation, including contacting CSS to determine how this incident occurred, the steps that CSS had undertaken to address the situation and the identification of Provident's members who may have been affected by the incident. Provident obtained assurances that CSS retrieved all the sensitive information related to Provident's members from the former CSS president. Provident also attempted to work with CSS to identify the

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Bruce A. Radke Shareholder +1 312 609 7689 bradke@vedderprice.com The Honorable Joseph Foster June 13, 2017 Page 2

specific Provident members that may have been impacted by this incident, which was a difficult and time-consuming process.

Notice to the New Hampshire Residents

On May 24, 2017, Provident notified the eleven (11) affected New Hampshire residents of the incident. Attached is a sample of the notification letter that was sent to the affected New Hampshire residents via first-class United States mail. Additionally, Provident has arranged to offer one (1) year of complimentary credit monitoring and identity theft protection services through Experian to the affected New Hampshire residents. Provident also has established a toll-free, confidential telephone inquiry line (844-727-0027) that the affected New Hampshire residents can call between 6:00 a.m. and 3:00 p.m., Pacific time, Monday through Friday, to ask questions and to receive further information regarding this incident.

Other Steps Undertaken by Provident

Provident has undertaken several additional actions to help prevent this type of incident from occurring in the future. Those measures include, as indicated above, terminating its relationship with CSS. In addition, Provident is evaluating the policy and procedure requirements of its vendors regarding electronic security controls and the safeguarding of members' sensitive information.

Contact Information

Please contact me if you have any questions or if I can provide you with any further information concerning this matter. Thank you.

Yours very truly

Bruce A. Radke

BAR/bah Enclosure

cc: Christine Keane, VP Risk Management, Provident Credit Union (via e-mail)



Mail Handling Services 777 E Park Dr Harrisburg, PA 17111

May 24, 2017

Cassandra L McDaniel 7564 Circle Hill Dr Oakland, CA 94605-3002 A-97

Dear Cassandra L McDaniel,

NOTICE OF DATA BREACH

Provident Credit Union ("Provident") values and respects your privacy, which is why we are writing to advise you about a recent incident that may affect your personal information. Although we have no reason to believe that your personal information has been misused for the purpose of committing fraud or identity theft, we are writing to provide you with guidance on what you can do to protect yourself, should you feel it is appropriate to do so.

What Happened

On April 25, 2017, Provident confirmed that certain of your personal information (described below) may have been disclosed by a former employee of Creditors Specialty Services, Inc. ("CSS") on or about March 3, 2017. Previously, Provident had retained CSS to assist Provident in connection with certain functions of the credit union's business operations. Provident has terminated its relationship with CSS. CSS has advised Provident that the personal information of Provident's members has been returned by the former employee to CSS.

What Information Was Involved

Provident believes that your personal information involved in this incident may include your name, home address and Social Security number.

What We Are Doing

Upon learning of the incident, Provident promptly launched an internal investigation, including contacting CSS to determine how this incident occurred, the steps that CSS has undertaken to address the situation and the identification of Provident's members who may have been affected by this incident. Provident has taken immediate action to help prevent this type of incident from occurring in the future, including, as indicated above, terminating its relationship with CSS. In addition, Provident is evaluating the policy and procedure requirements of its vendors regarding electronic security controls and the safe-guarding of members' personal information.

Provident has arranged for one year of free credit monitoring and identity protection services through Experian's[®] ProtectMyID[®] Alert, which will promptly alert you to potential issues and help you resolve them. ProtectMyID[®] Alert is being offered at no cost to you. Please see the additional information below for instructions on how to activate your complimentary one-year ProtectMyID[®] Alert membership using the Activation Code listed below.

What You Can Do

As a further 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 credit reports closely. If you detect any suspicious activity on an account, you should promptly notify Provident or 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").

Other Important Information

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.

<u>Credit Reports</u>: 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 http://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/cra/requestformfinal.pdf.

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, including obtaining information about fraud alerts and placing a security freeze on your credit files, is as follows:

Equifax	Experian	TransUnion
1-800-349-9960	1-888-397-3742	1-888-909-8872
www.equifax.com	www.experian.com	www.ransunion.com
P.O. Box 105788	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19022

<u>Fraud Alerts:</u> You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that creditors 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 http://www.annualcreditreport.com.

Credit and Security Freezes: 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 on your credit file, 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 cause a delay should you attempt to obtain credit. In addition, you may incur fees for placing, lifting and/or removing a credit freeze. Credit freeze laws vary from state to state. The cost of placing, temporarily lifting and removing a credit freeze also varies by state, generally from \$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. 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	Experian Security	TransUnion Security Freeze
Freeze	Freeze	Fraud Victim Assistance Dept.
P.O. Box 105788	P.O. Box 9554	P.O. Box 6790
Atlanta, GA 30348	Allen, TX 75013	Fullerton, CA 92834

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.

This notice has not been postponed at the request of a law enforcement agency or as the result of a law enforcement investigation.

For More Information

We have established a confidential telephone inquiry line to assist you with any questions you may have regarding this incident. This confidential inquiry line is available, at no cost to you, between 6:00 a.m. and 3:00 p.m., Pacific time, Monday through Friday, at 1-844-727-0027.

Provident values the trust you place in Provident to protect the privacy and security of your personal information, and we apologize for any inconvenience or concern that this incident might cause you.

Sincerely,

Theresa Howe

Assistant Vice President Account Services

Provident Credit Union

Theresa House

Activating Your Complimentary Credit Monitoring

To help protect your identity, we are offering a **complimentary** one-year membership of Experian's® ProtectMyID® Alert. 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 ProtectMyID Now in Three Easy Steps

- 1. ENSURE that you enroll by August 4, 2017. (Your code will not work after this date.)
- 2. VISIT the ProtectMyID Website to enroll: www.protectmyid.com/redeem.
- 3. PROVIDE your Activation Code: PA33SZQ8Z

If you have questions or need an alternative to enrolling online, please call 1-877-371-7902 and provide engagement #PC-230.

ADDITIONAL DETAILS REGARDING YOUR ONE-YEAR PROTECTMYID MEMBERSHIP:

A credit card is not required for enrollment.

Once your ProtectMyID membership is activated, you will receive the following features:

- Free Copy of Your Experian Credit Report
- Surveillance Alerts for the following:
 - o **Daily Bureau Credit Monitoring:** Alerts of key changes and suspicious activity found on your Experian, Equifax® and TransUnion® credit reports.
- Identity Theft Resolution and ProtectMyID ExtendCARE: Toll-free access to U.S.-based customer care and a dedicated Identity Theft Resolution Agent, who will walk you through the process of fraud resolution from start to finish for seamless service. The agent will investigate each incident; help you contact credit grantors to dispute charges and close accounts, including credit, debit and medical insurance cards; assist with freezing credit files; and contact government agencies.
 - o It is recognized that identity theft can happen months and even years after a data breach. To offer added protection, you will receive ExtendCARETM, which provides you with the same high level of fraud resolution support even after your ProtectMyID membership has expired.
- \$1 Million Identity Theft Insurance*: Immediately covers certain costs, including lost wages, private investigator fees and unauthorized electronic fund transfers.

Activate your membership today at www.protectmyid.com/redeem or call 1-877-288-8057 to register with the Activation Code above.

Once your enrollment in ProtectMyID is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID, 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 1-877-288-8057.

*Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of AIG. The description herein is a summary and is 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.