

RECEIVED

MAY 21 2018

CONSUMER PROTECTION

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James J. Giszczak
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May 16, 2018

Attorney General Gordon J. MacDonald
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: University of Toledo – Incident Notification

Dear Sir or Madam:

McDonald Hopkins PLC represents The University of Toledo. I write to provide notification concerning an incident that may affect the security of personal information of three (3) New Hampshire residents. The University of Toledo's investigation of this incident is ongoing and this notification will be supplemented with any new significant facts or findings subsequent to this submission, if any. By providing this notice, the University of Toledo does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

On January 16, 2018, the University of Toledo learned that one of its faculty members misplaced an unencrypted flash drive. Since completing an extensive data analysis, on March 30, 2018, the University of Toledo concluded the misplaced flash drive contained personal information belonging to a limited number of its students, faculty, staff, and external research collaborators. The information that was available on the flash drive included the affected New Hampshire residents' names, addresses, and Social Security numbers, and may have also included dates of birth.

To date, the University of Toledo is not aware of any confirmed instances of identity fraud as a direct result of this incident. Nevertheless, the University of Toledo wanted to make you (and the affected residents) aware of the incident and explain the steps it is taking to help safeguard the affected residents against identity fraud. The University of Toledo provided the affected residents with written notice of this incident commencing on May 15, 2018 in substantially the same form as the letter attached hereto. Additionally, it offered the affected residents a complimentary membership with a credit monitoring and identity theft protection service. It also advised the affected residents to remain vigilant in reviewing financial account statements for fraudulent or irregular activity. It advised the affected residents about the process for placing a fraud alert and security freeze on their credit files and obtaining a free credit report. It provided the affected residents with the contact information for the consumer reporting agencies and the Federal Trade Commission.

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The University of Toledo takes its obligation to help protect personal information very seriously. It is continually evaluating and modifying its practices to enhance the security and privacy of confidential information.

Should you have any questions regarding this notification, please contact me at (248) 220-1354 or jgiszczak@mcdonaldhopkins.com.

Sincerely,



James J. Giszczak

Encl.



University of Toledo
C/O GCG
P.O. Box 10582
Dublin, OH 43017-7282

**IMPORTANT INFORMATION
PLEASE REVIEW CAREFULLY**

<<Name 1>> <<Name 2>>
<<Address 1>>
<<Address 2>>
<<City>>, <<State>> <<Zip>>
<<Country>>

<<Date>>

Dear <<Name1>>:

I am writing with important information regarding a security incident. The privacy and security of the personal information belonging to our students, faculty, staff, and external research collaborators is of the utmost importance to The University of Toledo. As such, we wanted to provide you with information about the incident, explain the services we are making available to you, and let you know that we continue to take significant measures to protect your information.

What Happened?

On January 16, 2018, we learned that a University of Toledo faculty member misplaced an unencrypted flash drive. Upon learning of the issue, we commenced a prompt and thorough investigation. As part of our investigation, we worked very closely with external cybersecurity professionals.

What Information Was Involved?

Since completing the extensive data analysis, on March 30, 2018, we concluded the misplaced flash drive contained personal information belonging to some of our students, faculty, staff, and external research collaborators. The information that was available on the flash drive included your name, address, and Social Security number, and may have also included your date of birth.

What We Are Doing.

We have no evidence that any of the information on the misplaced flash drive has been accessed or misused. Nevertheless, out of an abundance of caution, we wanted to make you aware of the incident.

What You Can Do.

To protect you from potential misuse of your information, we are offering a complimentary one-year membership of 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 Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.

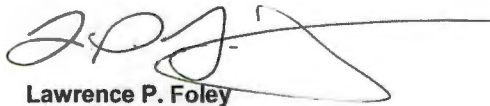
This letter also provides other precautionary measures you can take to protect your personal information, including placing a Fraud Alert and/or Security Freeze on your credit files, and/or obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis.

For More Information.

Please accept our apologies that this incident occurred. We are committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices and internal controls to enhance the security and privacy of your personal information.

If you have any further questions regarding this incident, please call our dedicated and confidential toll-free response line that we have set up to respond to questions at (888) 420-1666. This response line is staffed with professionals familiar with this incident and knowledgeable on what you can do to protect against misuse of your information. The response line is available Monday through Friday, 9 a.m. to 7 p.m. Eastern Time.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. P. Foley', with a long horizontal flourish extending to the right.

Lawrence P. Foley
Administrator for Risk Management

– OTHER IMPORTANT INFORMATION –

1. Enrolling in Complimentary 12-Month Credit Monitoring.

To help protect your identity, we are offering a **complimentary** one-year membership of Experian IdentityWorksSM Credit 3B. 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 Credit 3B Now in Three Easy Steps

1. ENROLL by: **8.5.18** (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: [Code]**

If you have questions about the product, need assistance with identity restoration 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 **DB06637** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

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, Equifax and Transunion files for indicators of fraud.
- **Experian IdentityWorks ExtendCARETM:** 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.

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and 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.

2. Placing a Fraud Alert.

Whether or not you choose to use the complimentary 12 month credit monitoring services, we recommend that you place an initial 90-day “Fraud Alert” on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

Equifax

P.O. Box 105069
Atlanta, GA 30348
www.equifax.com
1-800-525-6285

Experian

P.O. Box 2002
Allen, TX 75013
www.experian.com
1-888-397-3742

TransUnion LLC

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

3. Consider Placing a Security Freeze on Your Credit File.

If you are very concerned about becoming a victim of fraud or identity theft, you may request a “Security Freeze” be placed on your credit file. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by sending a request in writing, by mail, to all three nationwide credit reporting companies. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze

P.O. Box 105788
Atlanta, GA 30348
<https://www.freeze.equifax.com>
1-800-685-1111

Experian Security Freeze

P.O. Box 9554
Allen, TX 75013
<http://experian.com/freeze>
1-888-397-3742

TransUnion Security Freeze

P.O. Box 2000
Chester, PA 19016
<http://www.transunion.com/securityfreeze>
1-888-909-8872

When you place a security freeze on your credit report, you will be provided with a personal identification number, password, or similar device to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report to a specific party or parties or for a specific period of time after the freeze is in place.

In order to request a security freeze, you may 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. Complete address;
5. Prior addresses;
6. Proof(s) of identification (state driver’s license or ID card, military identification, birth certificate, etc.);
7. If you are a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft;
8. If you are not a victim of identity theft, payment. Do not send cash through the mail.

If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze, either completely if you are shopping around or specifically for a certain creditor, with enough advance notice before you apply for new credit for the lifting to take effect.

4. Obtaining a Free Credit Report.

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at **www.annualcreditreport.com**. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

5. Additional Helpful Resources.

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at www.ftc.gov/idtheft, by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.

Iowa Residents: You may contact law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity Theft: 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: (515) 281-5164

Maryland Residents: You may obtain information about avoiding identity theft from the Maryland Attorney General's Office: Office of the Attorney General of Maryland, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023.

North Carolina Residents: You may obtain information about preventing identity theft from the North Carolina Attorney General's Office: Office of the Attorney General of North Carolina, Department of Justice, 9001 Mail Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov/, Telephone: 877-566-7226.

Oregon Residents: You may obtain information about preventing identity theft from the Oregon Attorney General's Office: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 877-877-9392