



MULLEN  
COUGHLIN<sub>LLC</sub>  
ATTORNEYS AT LAW

RECEIVED

JUN 26 2020

CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302  
Wayne, PA 19087

June 18, 2020

**VIA FIRST-CLASS MAIL**

Consumer Protection Bureau  
Office of the New Hampshire Attorney General  
33 Capitol Street  
Concord, NH 03301

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent Valencia College located at 1768 Park Center Drive, Orlando, Florida 32835, and are writing to notify your office of an incident that may affect the security of some personal information relating to one (1) New Hampshire resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Valencia College does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

**Nature of the Data Event**

On or about January 9, 2020, Valencia College became aware of unusual activity on an employee's email account. Upon discovery, Valencia College immediately launched an investigation which included working with third-party forensic experts to determine the full nature and scope of this incident. The investigation determined that an unknown individual may have accessed the Valencia College employee's email account between November 27, 2019 and January 8, 2020. Therefore, Valencia College began a systematic review of the contents of the email account to determine what information was contained therein and to whom it relates. On February 28, 2020, we confirmed personal information was present in the email account. Valencia College then reviewed their files to determine address and contact information for those individuals. On April 1, 2020, Valencia College determined addresses for individuals and continued to review the affected emails to ensure individuals received the proper notification of potentially impacted

information. On May 7, 2020, review of the emails was complete. On June 9, 2020, New Hampshire resident were identified as impacted by the national change of address report. The information that could have been subject to unauthorized access includes name and Social Security number.

#### **Notice to New Hampshire Resident**

On or about June 15, 2020, Valencia College provided written notice of this incident to all affected individuals, which includes one (1) New Hampshire resident. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

#### **Other Steps Taken and To Be Taken**

Upon discovering the event, Valencia College moved quickly to investigate and respond to the incident, assess the security of Valencia College systems, and notify potentially affected individuals. Valencia College is also working to implement additional safeguards and training to its employees. Valencia College is providing access to credit monitoring services for one (1) year, through Kroll, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Valencia College is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Valencia College is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

#### **Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4842.

Very truly yours,



Vincent F. Regan of  
MULLEN COUGHLIN LLC

# EXHIBIT A



<<Date>> (Format: Month Day, Year)

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country >>

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>,

Valencia College writes to notify you of an incident that may affect the privacy of some of your personal information. Valencia College takes the safeguarding of your information very seriously, and although we have no evidence of actual or attempted misuse of your information potentially affected by this incident, this letter provides details of the incident, our response, and resources available to you to help protect your personal information from possible misuse, should you feel it is appropriate to do so.

**What Happened?** On or about January 9, 2020, Valencia College became aware of unusual activity on an employee's email account. Upon discovery, we immediately launched an investigation which included working with third-party forensic experts to determine the full nature and scope of this incident. The investigation determined that an unknown individual may have accessed the Valencia College employee's email account between November 27, 2019 and January 8, 2020. Therefore, we began a systematic review of the contents of the email account to determine what information was contained therein and to whom it relates. On February 28, 2020, we confirmed personal information was present in the email account. We then reviewed our files to determine address and contact information for those individuals. On April 1, 2020, we determined addresses for individuals and continued to review the affected emails to ensure individuals received the proper notification of potentially impacted information. On May 7, 2020, review of the emails was complete. Although we are unaware of any actual or attempted misuse of your personal information, we are providing you this notification out of an abundance of caution because your information was present in the email account.

**What Information Was Involved?** The information present in the email account at the time of the incident may have included your <<b2b\_text\_1(ImpactedData)>>.

**What Are We Doing?** Information privacy and security are among our highest priorities. We have strict security measures in place to safeguard information in our care. Upon discovering this incident, we immediately took steps to confirm the security of our systems, including our employee email accounts. We have implemented additional measures to help further protect information, including enhanced email security, multi-factor authentication requirement in all employee email accounts, and employee cyber awareness training. In an abundance of caution, we are notifying potentially impacted individuals, including you, so that you may take steps to help protect your information, should you feel it is appropriate to do so. Although we are unaware of any actual or attempted misuse of information as a result of this incident, we arranged to have Kroll provide you with identity monitoring services for one year at no cost to you as an added precaution. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit [https://\[IDMonitoringURL\]](https://[IDMonitoringURL]) to activate and take advantage of your identity monitoring services.

You have until *[Date]* to activate your identity monitoring services.

Membership Number: <<Member ID>>

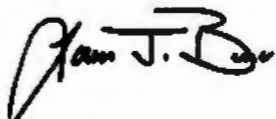
Additional information describing your services is included with this letter.

**What Can You Do?** We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. You may review the information contained in the attached "Steps You Can Take to Help Protect Your Information." You may also activate the identity monitoring services we are making available to you. There is no charge to you for the cost of this service; however, you will need to activate the service yourself.

**For More Information.** We recognize that you may have questions not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-800-833-3333 (toll free), Monday through Friday from 9:00 a.m. to 6:30 p.m., Eastern Time, excluding U.S. holidays.

We sincerely regret any inconvenience this incident may cause you. Protecting your information is important to us, and Valencia College remains committed to safeguarding the information in our care.

Sincerely,

A handwritten signature in black ink, appearing to read "Loren J. Bender". The signature is stylized with a large initial "L" and a flourish at the end.

Loren Bender  
Vice President, Business Operations & Finance  
Valencia College

## Steps You Can Take to Help Protect Your Information

### **Monitor Accounts, Financial, and Medical Billing Statements**

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, medical bills, explanation of benefits (EOBs), and credit reports for suspicious charges or claims. Under U.S. law you are entitled to one (1) free credit report annually from each of the three (3) major credit reporting bureaus. To order your free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

#### **Experian**

P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

#### **TransUnion**

P.O. Box 160  
Woodlyn, PA 19094  
1-888-909-8872

[www.transunion.com/credit-freeze](http://www.transunion.com/credit-freeze)

#### **Equifax**

P.O. Box 105788  
Atlanta, GA 30348-5788  
1-800-685-1111

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

In order to request a security freeze, you will 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. If you have moved in the past five (5) years, provide 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, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your file at no cost. An initial fraud alert is a one (1) year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

#### **Experian**

P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/fraud/center.html](http://www.experian.com/fraud/center.html)

#### **TransUnion**

P.O. Box 2000  
Chester, PA 19106  
1-800-680-7289

[www.transunion.com/fraud-alerts](http://www.transunion.com/fraud-alerts)

#### **Equifax**

P.O. Box 105069  
Atlanta, GA 30348  
1-888-766-0008

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

### **Additional Information**

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; [www.identitytheft.gov](http://www.identitytheft.gov); 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file

a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

**For North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6000, [www.ncdoj.gov](http://www.ncdoj.gov). You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

**For Maryland residents**, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-410-528-8662, [www.oag.state.md.us](http://www.oag.state.md.us).

**For New York residents**, the Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; and <https://ag.ny.gov/>.



## **TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES**

You have been provided with access to the following services from Kroll:

### **Single Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you will have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.