



LEWIS BRISBOIS BISGAARD & SMITH LLP

May 3, 2023

Via electronic-mail: DOJ-CPB@doj.nh.gov; AttorneyGeneral@doj.nh.gov

Attorney General John Formella

Consumer Protection Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03302

Re: Our Client: Veridian Credit Union
Matter: April 2023 Data Security Incident

Dear Attorney General Formella:

We represent Veridian Credit Union (“VCU”), headquartered in Waterloo, Iowa, with respect to a data security incident described in more detail below. VCU takes the security and privacy of the information in its control seriously, and has taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the security incident, what information may have been compromised, the number of New Hampshire residents being notified, and the steps that VCU has taken in response to this incident. We have also enclosed hereto a sample of the notification made to the potentially impact individuals, which includes an offer of free credit monitoring.

1. Nature of the Security Incident

On April 3, 2023, VCU detected and stopped a network security incident. VCU found that an unauthorized party had attacked Veridian’s online membership application system by beginning an application using information about individuals that the unauthorized party already possessed. By using such information, the unauthorized party was able to potentially obtain additional information about the individuals by generating a credit report in the system and possibly accessing the content. Upon discovery of the attack, VCU’s IT team worked quickly to remediate the vulnerability. VCU’s network has been secured and remediated. VCU initiated a comprehensive investigation into what sensitive data could have been compromised.

Although VCU found no evidence that individuals' personal information has been specifically misused, it is possible that individual's

could have been exposed to the cybercriminal.

As of this writing, VCU has not received any reports of related identity theft since the discovery of the incident (April 3, 2023 to present).

2. New Hampshire Residents Notified

A total of forty-seven (47) New Hampshire residents were potentially affected by this security incident. Notification letters was mailed to these individuals on May 3, 2023 by first class mail. A sample copy of the notification letter is included with this letter.

3. Steps Taken

Upon detecting this incident, VCU moved quickly to initiate a response, which included remediating the vulnerability and conducting a comprehensive investigation into the incident. VCU has reported this incident to law enforcement. VCU has reviewed and altered its policies and procedures relating to the security of its systems and servers and applicant information processing.

Although VCU is not aware of any evidence of misuse of personal information, VCU extended to potentially impacted individuals an offer for free credit monitoring and identity theft protection through IDX. This service will include 12 months of credit monitoring, along with a fully managed ID theft recovery service, should the need arise.

4. Contact Information

VCU remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact Ryan M. Cook, Esq. at:

Sincerely,


Ryan M. Cook for
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure: *Sample notification letter*

RMC



Return to IDX
P.O. Box 1907
Suwanee, GA 30024

To Enroll, Please Call:
1-888-566-0215
Or Visit:
<https://app.idx.us/account-creation/protect>
Enrollment Code: [XXXXXXXXXX]

<<First Name>> <<Last Name>>
[STREET ADDRESS]
[CITY, STATE AND POSTAL CODE]

May 3, 2023

NOTICE OF DATA SECURITY INCIDENT

Dear <<First Name>> <<Last Name>>:

We are writing to let you know about a data security incident that involves potential unauthorized access to your personal information. While we understand you are not a current member of Veridian Credit Union (“Veridian”), your personal information may have been compromised due to an attack on Veridian’s online membership application process. This letter explains what happened and what you can do to help protect your personal information.

WHAT HAPPENED?

An unauthorized party recently attacked Veridian’s online membership application system by beginning an application using information about you they already possessed. By using such information, the unauthorized party was able to potentially obtain additional information about you by generating a credit report in the system and possibly accessing the content. The bulk of the attacks on the system occurred between April 1-2 of this year.

WHAT INFORMATION WAS INVOLVED?

The data accessed may have included personal information from a credit report such as

WHAT WE ARE DOING

Veridian values your privacy and deeply regrets that this incident occurred. Upon becoming aware of this incident, Veridian immediately conducted a thorough review of the affected application system and took action to prevent a recurrence of such an attack and to protect the privacy of all affected individuals. Veridian is also working with the credit bureau who provided the credit report noted above and is contacting law enforcement to address the incident.

In addition, we are offering identity theft protection services through IDX, A ZeroFox Company, the data breach and recovery services expert. IDX identity protection services include: [12 months/24 months] of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

WHAT YOU CAN DO

We encourage you to contact IDX with any questions and to enroll in the free identity protection services by calling or going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 9 am - 9 pm Eastern Time. Please note the deadline to enroll is August 3, 2023.

At this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

FOR MORE INFORMATION

You will find detailed instructions for enrollment on the enclosed document (Steps You Can Take to Further Protect Your Information) along with other steps you can take to protect your information. Also, you will need to reference the enrollment code at the top of this letter when calling or enrolling online, so please do not discard this letter.

We understand this notice is very concerning and apologize that this incident has occurred. We welcome your questions as we work together to protect your personal information.

Sincerely,

Brett Engstrom
Chief Information Officer

P.O. Box 6000
1827 Ansborough Ave.
Waterloo, IA 50704-6000
800.235.3228
veridiancu.org



Equal Housing Opportunity.
This credit union is federally insured by
the National Credit Union Administration.

Steps You Can Take to Help Protect Your Information

Website and Enrollment. Go to <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.

Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

Telephone. Contact IDX at 1-888-566-0215 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone or online. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years.

Experian

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

www.experian.com/fraud/center.html

TransUnion

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

www.transunion.com/fraud-alerts

Equifax

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

<https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>

Monitoring: You should always remain vigilant for incidents of fraud and identity theft by reviewing credit card and other account statements for the next 12-24 months and by monitoring your credit report for suspicious or unusual activity. If you detect any suspicious activity on an account, you should immediately notify the financial institution or company with which the account is maintained.

Security Freeze: You have the right to place a security freeze on your credit report. By placing a security freeze, someone who fraudulently acquires your personal identifying information will not be able to use that information to open new accounts or borrow money in your name. You will need to contact the three national credit reporting bureaus listed above to place the freeze. Keep in mind that when you place the freeze, you will not be able to borrow money, obtain instant credit, or get a new credit card until you temporarily lift or permanently remove the freeze. There is no cost to freeze or unfreeze your credit files.

Experian

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

www.experian.com/freeze/center.html

TransUnion

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

www.transunion.com/credit-freeze

Equifax

P.O. Box 105788
Atlanta, GA 30348-5788
1-888-298-0045

<https://www.equifax.com/personal/credit-report-services/credit-freeze/>

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: 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, 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. Instances of known or suspected identity theft should also be reported to law enforcement.

For residents of Iowa: State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Massachusetts: It is required by state law that you are informed of your right to obtain a police report filed in regard to this 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.

For residents of New Mexico: State law advises you to review personal account statements and credit reports, as applicable, to detect errors resulting from the security breach. You have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; and you may seek damages from violators. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act at www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For residents of Oregon: State law advises you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of Rhode Island: It is required by state law that you are informed of your right to file or obtain a police report in regard to this incident.

For residents of Arizona, Colorado, District of Columbia, Illinois, Maryland, New York, North Carolina, and Rhode Island: You can obtain information from the Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Federal Trade Commission - Consumer Response Center: 600 Pennsylvania Ave, NW, Washington, DC 20580; 1-877-IDTHEFT (438-4338); www.identitytheft.gov

Arizona Office of the Attorney General Consumer Protection & Advocacy Section, 2005 North Central Avenue, Phoenix, AZ 85004 1-602-542-5025

Colorado Office of the Attorney General Consumer Protection 1300 Broadway, 9th Floor, Denver, CO 80203 1-720-508-6000 www.coag.gov

District of Columbia Office of the Attorney General – Office of Consumer Protection: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; www.oag.dc.gov

Illinois office of the Attorney General - 100 West Randolph Street, Chicago, IL 60601; 1-866-999-5630; www.illinoisattorneygeneral.gov

Maryland Office of the Attorney General - Consumer Protection Division: 200 St. Paul Place, 16th floor, Baltimore, MD 21202; 1-888-743-0023; www.oag.state.md.us

New York Office of Attorney General - Consumer Frauds & Protection: The Capitol, Albany, NY 12224; 1-800-771-7755; <https://ag.ny.gov/consumer-frauds/identity-theft>

North Carolina Office of the Attorney General - Consumer Protection Division: 9001 Mail Service Center, Raleigh, NC 27699; 1-877-566-7226; www.ncdoj.com

Rhode Island Office of the Attorney General - Consumer Protection: 150 South Main St., Providence RI 02903; 1-401-274-4400; www.riag.ri.gov