



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

RECEIVED

DEC 16 2021

CONSUMER PROTECTION

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609 SW 8th Street., Suite 600
Bentonville, AR 72712

December 8, 2021

VIA U.S. 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 Vermont Student Assistance Corporation (“VSAC”) located at 10 E. Allen St. Winooski, Vermont 05404. VSAC is a public nonprofit corporation established as an instrumentality of the state of Vermont by act of the Vermont General Assembly in Chapter 87 of Title 16, Vermont Statutes Annotated. We are writing to notify your office of an incident that may affect the security of some personal information relating to two (2) New Hampshire residents. 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, VSAC 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 June 30, 2021, VSAC discovered suspicious activity related to an employee’s email account. VSAC immediately took steps to secure the employee’s email account and launched an investigation to determine the nature and scope of the activity. The investigation determined that two employee mailboxes were subject to unauthorized access between about May 7, 2021 and June 30, 2021. During this time frame, the unauthorized actor may have had access to certain information within the mailboxes.

While the investigation was able to determine a set of emails or attachments that were potentially accessed, it was unable to determine the specific emails or attachments in the mailboxes that were actually accessed or acquired by an unknown actor. Therefore, out of an abundance of caution, VSAC conducted a review of the emails or attachments that were potentially accessed. VSAC’s review and investigation was recently completed, and VSAC is notifying individuals whose personal information was found within the mailboxes.

The information that could have been subject to unauthorized access includes name, address, Social Security number, financial account information, routing number, and bank name.

Notice to New Hampshire Residents

On or about December 8, 2021, VSAC provided written notice of this incident to all affected individuals, which includes two (2) New Hampshire residents. 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, VSAC moved quickly to investigate and respond to the incident, assess the security of VSAC systems, and notify potentially affected individuals. VSAC is also working to implement additional safeguards and training to its employees. VSAC is providing access to credit monitoring services for one (1) year, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, VSAC 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. VSAC is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, 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) 930-1613.

Very truly yours,

Katie L. Butler

Katie Butler of
MULLEN COUGHLIN LLC

KLB/kml
Enclosure

EXHIBIT A



Return Mail Processing
 PO Box 589
 Claysburg, PA 16625-0589

December 8, 2021



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 SAMPLE A SAMPLE - L01 GENERAL
 APT ABC
 123 ANY STREET
 ANYTOWN, ST 12345-6789



NOTICE OF [VARIABLE HEADER]

Dear Sample A. Sample:

Vermont Student Assistance Corporation (“VSAC”) is writing to inform you of a recent event that may impact the security of some of your information. While we are unaware of any actual or attempted misuse of your information, we are providing you with information about the incident, our response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it appropriate to do so.

What Happened? On or about June 30, 2021, VSAC discovered suspicious activity related to an employee’s email account. We immediately took steps to secure the employee’s email account and launched an investigation to determine the nature and scope of the activity. The investigation determined that two employee email accounts were subject to unauthorized access between about May 7, 2021 and June 30, 2021. During this time frame, the unauthorized actor may have had access to certain information within the accounts.

What Information Was Involved? While the investigation was able to determine a set of emails or attachments that were potentially accessed, it was unable to determine the specific emails or attachments in the accounts that were actually accessed or acquired by an unknown actor. Therefore, out of an abundance of caution, VSAC conducted a review of the emails or attachments that were potentially accessed. VSAC’s review and investigation was recently completed, and we are notifying you now because we determined that the accounts may have contained your [PII Elements]. To date, VSAC has not received any reports of actual or attempted misuse of your information.

What We Are Doing. The confidentiality, privacy, and security of information in our care is one of our highest priorities, and we take this incident very seriously. When we discovered this incident, we immediately reset the account passwords and took steps to determine what personal data was at risk. We also confirmed the security of our employee email accounts and related systems. As part of our ongoing commitment to the security of information in our care, we are working to review our existing policies and procedures, implement additional safeguards, and provide additional training to our employees on data privacy and security. We are also notifying state and federal regulators, as required.

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As an added precaution, we are also offering you complimentary access to [coverage length] of credit and identity monitoring, fraud consultation, and identity theft protection services through Experian. We encourage you to enroll in these services, as we are not able to act on your behalf to enroll you. Please review the instructions contained in the attached *Steps You Can Take to Help Protect Personal Information* for additional information on these services.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity to detect errors. Please also review the information contained in the enclosed *Steps You Can Take to Help Protect Personal Information*.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call VSAC at our dedicated assistance line at (866) 751-1319, Monday through Friday 8 am – 10 pm CST, Saturday and Sunday 10 am – 7 pm CST (excluding major U.S. holidays).

We sincerely regret any inconvenience or concern this incident has caused.

Sincerely,

A handwritten signature in black ink that reads "Scott Giles". The signature is written in a cursive style with a small mark above the letter 'i' in "Giles".

Scott Giles
President and CEO
Vermont Student Assistance Corporation

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Credit and Identity Monitoring

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for [coverage length].

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for [coverage length] from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary [coverage-length] membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by February 28, 2022** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: www.experianidworks.com/credit
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **(866) 751-1319** by **February 28, 2022**. Be prepared to provide engagement number **ENGAGE#** as proof of eligibility for the Identity Restoration services by Experian.

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.¹
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related 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 Insurance²:** Provides coverage for certain costs and unauthorized electronic fund transfers.

¹ Offline members will be eligible to call for additional reports quarterly after enrolling.

² The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.



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Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended "fraud alert" on a credit file at no cost. An initial fraud alert is a 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 three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a "credit freeze" on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer's express authorization. The credit 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 credit 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 credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to 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, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and 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 New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are two (2) Rhode Island resident impacted by this incident.

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