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# BakerHostetler

December 23, 2016

## Baker&Hostetler LLP

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## VIA OVERNIGHT MAIL

Joseph Foster Office of the Attorney General 33 Capitol St Concord, NH 03301

Re:

Incident Notification

## Dear Attorney General Foster:

Our client, Teikyo Loretto Heights University (d/b/a Colorado Heights University) ("CHU"), submits this notice after learning of a data security incident that involved unauthorized access to its vendor-hosted college management system containing student personal information. On November 23, 2016, CHU learned from its third-party vendor that an unauthorized person or persons may have created and accessed a backup of CHU's college management system. CHU immediately began working with the vendor and an outside cybersecurity firm to determine what happened. CHU's investigation confirmed that, between September 10, 2016 and September 13, 2016, an unauthorized person or persons may have created and accessed a backup of CHU's college management system, including current and former students' names, addresses, telephone numbers, student records, dates of birth, and, for some individuals, Social Security numbers.

CHU is notifying one (1) New Hampshire resident in accordance with N.H. Rev. Stat. Ann. § 359-C:20 in substantially the same form as the letter attached hereto. 1 Notice is being provided as expeditiously as practicable and without unreasonable delay. Additionally, CHU is notifying affected current and former students and offering those eligible a free one-year membership in credit monitoring and identity theft protection services from Experian. CHU has also established a dedicated call center to assist individuals with any questions they may have.

<sup>&</sup>lt;sup>1</sup> This report is not, and does not constitute, a waiver of personal jurisdiction.

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CHU understands the importance of protecting the personal information of its students, and continues to work with its third-party vendor to implement enhanced security measures to help prevent something like this from happening in the future.

Please do not hesitate to contact me if you have any questions regarding this matter.

Best regards,

William R. Daugherty

Counsel

**Enclosure** 



Return Mail Processing Center PO Box 6336 Portland, OR 97228-6336

<mail id>>
<First Name> <Last Name>
<Address I>
<Address 2>
<City>, <State>, <Zip>

<Date>

## Dear <first name> < last name>:

Teikyo Loretto Heights University (d/b/a Colorado Heights University) ("CHU") understands the importance of protecting the personal information of our students. Regrettably, this notice concerns an incident involving some of that information.

On November 23, 2016, CHU learned from our third-party vendor that hosts our college management system that an unauthorized person or persons may have created and accessed a backup of CHU's college management system. CHU immediately began working with the vendor and an outside cybersecurity firm to determine what happened. Our investigation confirmed that, between September 10, 2016 and September 13, 2016, an unauthorized person or persons may have created and accessed a backup of CHU's college management system, including your name, address, telephone number, student records, date of birth, and Social Security number.

Even though we have no indication that your information has been misused in any way, out of an abundance of caution, we are offering a complimentary one-year membership in 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. Unfortunately, due to privacy laws, we are not able to enroll you directly. For more information on ProtectMyID Alert and instructions on how to activate your complimentary one-year membership, please see the instructions included in this letter.

We deeply regret any inconvenience this may cause you. To help prevent something like this from happening in the future, we continue to work with our third-party vendor to implement enhanced security measures. If you have any questions, please call 844-258-9143, Monday through Friday between 7:00 a.m. and 7:00 p.m. Mountain Time.

Sincerely,

Julie Gordon Registrar

## Activate ProtectMyID Now in Three Easy Steps

- 1. ENSURE That You Enroll By: 12/23/2017 (Your code will not work after this date.)
- 2. VISIT the ProtectMyID Web Site to enroll: www.protectmyid.com/alert
- 3. PROVIDE Your Activation Code: <code>

If you have questions or need an alternative to enrolling online, please call 877-297-7780 and provide engagement #:

## ADDITIONAL DETAILS REGARDING YOUR 12-MONTH 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:

O Daily Bureau Credit Monitoring: Alerts of key changes & suspicious activity found on your

Experian, Equifax® and TransUnion® credit reports.

Identity Theft Resolution & ProtectMyID ExtendCARE: Toll-free access to US-based customer care and a dedicated Identify Theft Resolution agent who will walk you through the process of fraud resolution from start to finish for seamless service. They will investigate each incident; help with contacting credit grantors to dispute charges and close accounts including credit, debit and medical insurance cards; assist with freezing credit files; contact government agencies.

It is recognized that identity theft can happen months and even years after a data breach. To offer added protection, you will receive ExtendCARE<sup>TM</sup>, 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 <a href="www.protectmvid.com/alert">www.protectmvid.com/alert</a> or call 877-297-7780 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 877-297-7780.

Even if you choose not to take advantage of this free credit monitoring, we recommend that you remain vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111 Experian, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742 TransUnion, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

<sup>\*</sup> Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of 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.