

Akiyo Fujii

Deputy General Counsel for Business Affairs

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CONSUMER PROTECTION

April 30, 2020

New Hampshire Attorney General's Office 33 Capital Street Concord, NH 03301

To Whom It May Concern:

Pursuant to New Hampshire Rev. Stat.359-C:19 et seq., we are writing to inform you of a data security incident involving 2 New Hampshire residents.

I. Nature of Data Security Incident

On March 23, 2020, Tufts University became aware that the personal information, including Social Security numbers, belonging to several alumni of the Boston School of Occupational Therapy was available on publicly accessible web pages of two University websites. The websites are managed by the University's Digital Collections and Archives department (DCA). The relevant pages connect to an underlying database that included the names of the individuals and their Social Security numbers. The database and the webpages did not include any other Personal Information (PI), as defined in the statute. The DCA's standard practice was to restrict PI from unauthorized viewing. Due to an error, it appears the information which had been previously suppressed in the database became accessible by the webpages. It appears this occurred for one site in May 2019 and for the other site, in February 2020. Following those dates, the PI appears to have been accessible to public viewing until it was removed on March 23.

II. Number of Residents Affected

We have identified 2 New Hampshire residents whose personal information may have been exposed to third parties. Notice to each of the affected individuals is being provided by first class mail on or about April 30, 2020. A copy of the notice is enclosed.

III. Steps Taken Relating to the Incident

The webpages containing sensitive information were removed from public access upon discovery on March 23, 2020. As of March 26, 2020, DCA staff had removed all known Social Security numbers from its internal collection management database. While we have no evidence that this security breach resulted in any personal information being accessed or used in an unauthorized manner, due to the potential risks involved, however, we will notify all the affected individuals and provide them with steps they might take to reduce the risk of identity theft or fraud.

The Tufts Security and Privacy Program – the University's Written Information Security Program (WISP) – sets forth administrative, technical and physical safeguards to protect Restricted Institutional Data (RID) (which includes Sensitive Personal Information) and supports compliance with privacy and security obligations under applicable laws and regulations. This Program is composed of several elements, including requirements for evaluating electronic and physical methods of accessing, collecting, storing, using, transmitting, sharing, protecting, and disposing of RID. The Program covers all forms of RID, whether it is maintained on paper, digital, or other media. In response to this incident, WISP requirements were discussed with DCA staff.

IV. Mandatory Credit Monitoring

As noted in the enclosed notice, Tufts has arranged to provide 24 months of credit monitoring services to all affected individuals through Experian, a recognized credit monitoring provider, at no cost to them. Each letter will contain a unique activation code and instructions on activating the credit monitoring through Experian IdentityWorksSM Credit 3B. The notice also includes information on how the individuals may place a security freeze on their consumer credit report.

V. Contact Information

We trust that this letter and its enclosures provide you with all the information required to assess this matter. For any additional information, please contact me by phone at (617) 627-3336 or by email at akiyo.fujii@tufts.edu.

Sincerely,

Akiyo Fujii

Akiyo Fujii

Deputy General Counsel for Business Affairs



VIA FIRST CLASS MAIL

April 30, 2020

«Name» «Street_Address» «City», «State» «Zipcode»

Dear «Name»:

Tufts University takes very seriously its obligation to protect the personal information of students, alumni and all members of our community. We have instituted policies to contain and control the use of personal information, such as Social Security numbers. In line with data privacy regulations enacted in Massachusetts and other states, the University has undertaken a university-wide effort to locate and protect or securely destroy sensitive personal information maintained by the University. Thus, we deeply regret any situation where such information may be put at risk.

As a precautionary measure, we are writing to inform you of a recent data security incident that may have involved the unauthorized access to some of your personal information, including your Social Security number. On March 23, 2020, we were notified that some personal information was publicly accessible through the University's Digital Library and Archives at Tufts. Tufts secured the data the same day we were notified. It appears that this potential access started on or about May 31, 2019. We do not have any information that indicates that your information was accessed by any unauthorized person and we are not aware of any misuse of your personal information as a result of this incident. Please review the information provided in this letter for some steps that you may take to protect yourself against any potential misuse of your information.

Although there is no direct evidence of unauthorized access or use of personal information, out of an abundance of caution, we are offering a complimentary two-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 two-year membership, please see the additional information provided in this letter.

If you are the victim of identity theft, you have the right to file a police report and obtain a copy of it. You may also file a report online with the Federal Trade Commission at www.ldentityTheft.gov. You may use a copy of either report to report identity theft to the credit reporting agencies and other businesses. If you notice that

someone is using your Social Security number, you should also immediately contact the Social Security Administration at 1-800-772-1213 to report the theft.

In addition to the credit monitoring services, you have the right to place a security freeze on your credit reports. A security freeze will prohibit a credit reporting agency from releasing any information from your consumer credit report without your written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services. A consumer reporting agency may not charge a fee to any consumer who elects to place, lift or remove a security freeze from a consumer report. This freeze is designed to prevent credit, loans or services from being approved in your name without your consent.

To place a security freeze on your credit report, you must make a request either by toll-free telephone call or by visiting the website provided below at each of the three major consumer reporting agencies. We do not recommend using email to initiate the security freeze. You may also submit a request by regular, certified or overnight mail at the addresses below should you wish to do so.

Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 (800) 349-9960

<u>Equifax.com/personal/credit-report-services</u>

Experian Security Freeze P.O. Box 9554 Allen, TX 75013 (888) 397-3742

Experian.com/help

Trans Union Security Freeze P.O. Box 2000 Chester, PA 19016 (888) 909-8872 Transunion.com/credit-help

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.); and
- 7. If you are a victim of identity theft, include a copy of the police report, the report filed at IdentityTheft.gov, an investigative report, or a complaint to a law enforcement agency concerning identity theft.

The credit reporting agencies have three (3) business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five (5) business days

and provide you with a unique personal identification number (PIN) or password, or both that can be used by you to authorize the removal or lifting of the security freeze.

We apologize for any inconvenience or concern this situation may cause you. Tufts believes that it is important for you to be fully informed of any potential risk resulting from this incident. That is why we are writing to you today. You are in the best position to determine whether someone has misused your personal information, and we recommend that you take a few basic steps to safeguard yourself against the risk of identity theft.

Additional Free Resources on Identity Theft. You may wish to review the tips provided by the Federal Trade Commission on how to avoid identity theft. For more information, please visit http://www.ftc.gov/idtheft or call 1-877-ID-THEFT (877-438-4338). A copy of Take Charge: Fighting Back Against Identity Theft, a comprehensive guide from the FTC to help you guard against and deal with identity theft, can be found on the FTC's website at http://www.ftc.gov/bcp/edu/pubs/consumer/idtheft/idt04.shtm.

If you wish to speak to someone at Tufts about this notice or have questions about what to do, please call me, Akiyo Fujii, between 9:00 a.m. and 5:00 p.m., EST, Monday through Friday. Additionally, please notify us at the same number if you believe that your personal information has been misused. We trust that this letter has provided you with all the information required to assess this matter. For any additional information, please contact me by phone at (617) 627-3336 or by email at Akiyo.Fujii@tufts.edu. Thank you.

Sincerely,

Akiyo Fujii

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Deputy General Counsel

To help protect your identity, we are offering a **complimentary** two-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: 7.8.2020 (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 [xxxxx] as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24-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.