

# EDWARDS ANGELL PALMER & DODGE LLP

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October 30, 2009

New Hampshire State Attorney General's Office  
33 Capitol Road  
Concord, NH 03301

Re: Notification of potential security breach pursuant to N.H. Rev. Stat. § 359-C:20

Dear Sir/Madam:

On behalf of our client Williams College, we are writing to notify you of a potential breach of security involving the personal information of 9 New Hampshire residents.

The incident occurred on October 3, 2009. One or more persons broke into a Williams College vehicle that was parked in Boston, Massachusetts. They stole a laptop computer owned by the College. The College believes that the computer contained the names and Social Security numbers of approximately 750 individuals, 9 of whom are New Hampshire residents according to the most recent address information that the College has on record.

At this time the College has no knowledge that any personal information has been accessed or misused as a result of this incident.

The incident was reported to College officials on October 5, 2009. The College has taken the following actions:

- (1) The incident was promptly reported to the State Police at the scene on October 3<sup>rd</sup>.
- (2) The College promptly undertook to determine what personal information was on the laptop. The employee whose computer was stolen recently had replaced his laptop. The College's IT personnel examined the old laptop to determine which files had been copied onto the new one. The employee also was interviewed to determine what additional files had been placed on the new laptop.
- (3) The College scanned all of the files that are believed to exist on the stolen laptop to identify all personal information contained in those files.
- (4) The College referenced its alumni and other records to compile address information for all individuals whose personal information is believed to be on the stolen laptop.

(5) The College is sending notification letters to all those individuals via first-class mail. The College has had to prepare different versions of that notice in order to comply with the varying requirements of different states' data breach notification laws. (The individuals whose personal information is believed to be on the laptop currently reside in 39 different states and several foreign countries.) A copy of the notification letter that will be sent to New Hampshire residents is enclosed. The College also is notifying by email those affected individuals whose email addresses are on record with the College.

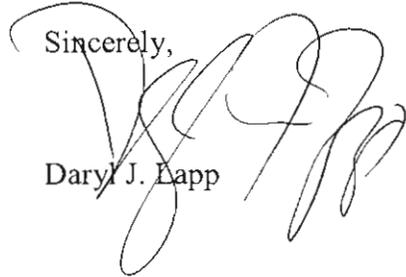
(6) The College has committed to provide identity theft safeguards to the affected individuals at the College's expense. Those services will be offered through Kroll, Inc., a risk consulting company with substantial experience in this area. The College has instructed Kroll to provide affected individuals toll-free access to its Consumer Solutions Center, along with twelve months of continuous credit monitoring and identity theft restoration services for all eligible persons. The College believes that the services offered to the affected individuals will help them immediately respond to any threats of identity theft or other misuse of their data as a result of this isolated incident.

(7) The College has undertaken measures to ensure that similar incidents do not occur in the future. In recent years the College, for example, has moved away from using Social Security numbers to identify people, has been training staff in data protection, and has been cleaning and encrypting laptops. The College will further review its policies and procedures and do everything it can to prevent a recurrence.

Please contact me if you have any questions concerning this letter or need further information.

Sincerely,

Daryl J. Lapp

A handwritten signature in black ink, appearing to read 'Daryl J. Lapp', is written over the typed name. The signature is fluid and cursive, with a large initial 'D' and 'L'.



URGENT  
Please Open Immediately.

<<FirstName>> <<MiddleName>> <<LastName>> <<Suffix>>  
<<Address1>>  
<<Address2>>  
<<City>>, <<StateProvince>> <<PostalCode>>  
<POSTNET BARCODE>

**ID TheftSmart™**

<<FirstName>> <<MiddleName>> <<LastName>>  
Membership Number: <<MembershipNumber>>

Member Services: 1-866-XXX-DR1A  
8:00 a.m. to 7:00 p.m. (Central Time), Monday through Friday  
If you have questions or feel you may have an identity theft issue,  
please call ID TheftSmart member services.

**Re: Potential breach of personal information**

Dear <<FirstName>> <<MiddleName>> <<LastName>> <<Suffix>>,

We are writing to notify you about a potential breach of your personal information. A Williams College laptop computer, containing names and Social Security numbers, including yours, was stolen in early October 2009.

While we currently have no information that any personal information has been misused, we nonetheless want to notify you of this incident, advise you of your rights and explain certain measures that the College has taken in response. We also want to apologize to you for any concern or inconvenience that this situation may cause.

**Identity Theft Safeguards – Provided to You by the College**

While we currently have no information that any personal information has been misused, we are providing identity theft safeguards to potentially affected individuals at the College's expense. Specifically, we have engaged Kroll Inc., to provide its ID TheftSmart™ service. This service includes a Current Credit Report, Continuous Credit Monitoring and Enhanced Identity Theft Consultation and Restoration.

For online credit monitoring services, you may submit an online authorization at [www.idintegrity.com](http://www.idintegrity.com) or fill out and return the enclosed *Consumer Credit Report and Credit Monitoring Authorization Form* to receive credit services through the mail.

Please note that to be eligible for the credit monitoring service, you need to be over the age of 18 with credit established in the U.S., have a Social Security number issued in your name, and have a U.S. residential address associated with your credit file.

If you meet the above criteria, please read the following instructions to start your credit report and monitoring service.

1. Go to [www.idintegrity.com](http://www.idintegrity.com), where you need to:
  - a. Provide the membership number included with this letter;
  - b. Insert your last name; and
  - c. Authenticate your online registration with the zip code from the address to which this letter was sent.  
If the letter was sent to a non-U.S. address, use "00000" for a zip code.
2. Once you click "continue" to sign up, please update your demographic information to your permanent residential U.S. address.

ID TheftSmart is one of the most comprehensive programs available to help protect your name and credit against identity theft. We encourage you to take the time to review the safeguards made available to you and to review your account statements and credit information regularly.

If you have any questions, or feel you have an identity theft issue, please call ID TheftSmart at 1-866-XXX-DRIA between 8:00 a.m. and 7:00 p.m. (Central Time), Monday through Friday.

Kroll will be able to help you through any of the procedures described below, if you choose to pursue them.

### **Credit Freeze**

*(the following information is based on information provided by the Massachusetts Attorney General's office)*

One option is to place a security freeze on your credit reports. You have the right to do this under Massachusetts law. A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without 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.

If you become a victim of identity theft, and you provide the credit reporting agency with a valid police report, it cannot charge you to place, lift or remove a security freeze. In all other cases, a credit reporting agency may charge you up to \$5.00 each to place, temporarily lift, or permanently remove a security freeze.

To place a security freeze on your credit report, you must send a written request to each of the three major consumer reporting agencies: Equifax ([www.equifax.com](http://www.equifax.com)); Experian ([www.experian.com](http://www.experian.com)); and TransUnion ([www.transunion.com](http://www.transunion.com)) by regular, certified or overnight mail at the addresses below:

- Equifax Security Freeze, P.O. Box 105788, Atlanta, Georgia 30348;
- Experian Security Freeze, P.O. Box 9554, Allen, TX 75013; and
- TransUnion Security Freeze, Fraud Victim Assistance Department P.O. Box 6790, Fullerton, CA 92834.

In order to request a security freeze, you will need to provide the following information:

- Full name (including middle initial and suffix), address, Social Security Number and date of birth;
- If you have moved in the past five years, addresses where you have lived over the prior five years;
- A copy of your driver's license or other government-issued identification card;
- A copy of a utility bill or bank or insurance statement that displays your name, current mailing address and date of issue; and
- Police report, investigative report or complaint to a law enforcement agency concerning the identity theft; or
- If police report, investigative report or complaint is not available, fee of \$5.00 for each placing, temporary lifting or removing of a security freeze.

The credit reporting agencies have three business days after receiving your request to place a security freeze on your credit report. The credit bureaus also must send written confirmation to you within five business days and provide you with a unique personal identification number (PIN) or password, or both, that you can use to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, you must call or send a written request to the credit reporting agencies by mail and include proper identification (name, address, and Social Security Number) and the PIN number or password provided to you when you placed the security freeze as well as the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have three business days after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must send a written request to each of the three credit bureaus by mail and include proper identification (name, address, and Social Security Number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have three business days after receiving your request to remove the security freeze.

**Other Remedial Actions by the College**

In addition to providing Kroll's ID TheftSmart service described above, the College is taking additional steps to help safeguard personal information. In recent years, the College has increased its efforts to minimize the chance of such a breach. For example, we've moved away from using Social Security numbers to identify people, have been training staff in data protection, and have been cleaning and encrypting laptops. We'll now review further our policies and procedures and do everything we can to prevent a recurrence.

**Police Reports**

Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. This incident was reported to the Massachusetts State Police. You may request a copy of the report by contacting:

**Massachusetts State Police**

Attn: Criminal Records  
470 Worcester Road  
Framingham, MA 01702  
(508) 820-2300

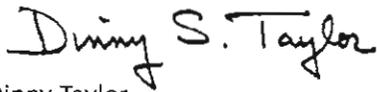
The Trooper who responded to the incident, whose name the State Police may need to identify any incident report, is John Analetto.

**If You Are the Victim of Identity Theft**

If you are, or suspect you are, the victim of identity theft, you have the right to file a police report and obtain a copy of that report. You also are encouraged to report the matter to local law enforcement, your state Attorney General, and the Federal Trade Commission.

We apologize again for any inconvenience or concern this situation may cause. We remain committed to maintaining the privacy of personal information as a key priority and will continue to take the steps needed to protect it. If you want to talk to someone at Williams to confirm the authenticity of this letter or to clarify its contents, please contact me at (413) 597-2094.

Sincerely,



Dinny Taylor  
Chief Technology Officer