



150 N. Riverside Plaza, Suite 3000, Chicago, IL 60606 • (312) 819-1900

June 10, 2022

Bruce A. Radke
312-463-6211
312-819-1910 Direct Fax
bradke@polsinelli.com

VIA E-MAIL (IDTHEFT@OAG.STATE.MD.US)

Office of the Attorney General
Attn: Jeff Karberg, Administrator of the Identity Theft Program
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

Re: Notification of a Potential Data Security Incident

Dear Mr. Karberg:

We represent Simpson University ("Simpson"), 2211 College View Drive, Redding, California 96003, in connection with an incident that may have involved the personal information of three (3) Maryland residents. Simpson is reporting the incident pursuant to MD. CODE ANN., COM. LAW § 14-3504(h). This notice will be supplemented, if necessary, with any new significant facts discovered subsequent to this submission. While Simpson is notifying you of this incident, Simpson does not waive any rights or defenses relating to the incident, this notice, or the applicability of Maryland law on personal jurisdiction.

NATURE OF THE INCIDENT

On August 13, 2021, Simpson identified suspicious activity in certain Simpson University employee email accounts. Upon learning of the activity, Simpson promptly began an internal investigation. Simpson also engaged a forensic security firm to investigate and confirm the security of its email and computer systems. The investigation determined that an unauthorized third party gained access to six (6) Simpson email accounts between July 29, 2021 and September 17, 2021.

The investigation did not find evidence confirming that the third party actually viewed any personal information in the accounts. Nevertheless, because there was authorized access to the email accounts, Simpson thoroughly manually reviewed the contents of the six (6) accounts to determine if they contained any personal information that may have been

polsinelli.com

Atlanta Boston Chicago Dallas Denver Houston Kansas City Los Angeles Nashville New York Phoenix
St. Louis San Francisco Washington, D.C. Wilmington
Polsinelli PC, Polsinelli LLP in California

June 10, 2022

Page 2

accessible to the third party. Simpson then looked for addresses for the individuals whose personal information was contained in the email accounts so that notice could be provided.

NOTICE TO THE MARYLAND RESIDENTS

On February 1, 2022, Simpson determined that three (3) Maryland residents' personal information was contained in the relevant email accounts. Specifically, the email accounts contained the individuals' names, Social Security numbers, dates of birth, usernames/email addresses with passwords, and/or medical condition or treatment information. While Simpson is not aware of any fraud or identity theft to any individual as a result of this incident, Simpson notified individuals of the situation by letters mailed on June 9, 2022. For those individuals whose Social Security numbers were contained in the involved accounts, the notification letter included an offer for twelve (12) months of complimentary credit monitoring and identity theft protection. Attached is a sample of the notification letter that was sent to the Maryland residents via first-class United States mail.

STEPS TAKEN RELATING TO THE INCIDENT

Upon learning of the incident, Simpson promptly contained the incident by securing the email accounts to prevent further access. It also engaged a forensic security firm through counsel to investigate and confirm the security of its email and computer systems. Simpson is undertaking efforts to reduce the risk of a similar incident occurring in the future, including enhancing its technical security measures. Finally, as discussed above, Simpson is notifying the involved residents with an offer for one year of complimentary credit monitoring and identity theft protection.

CONTACT INFORMATION

Please do not hesitate to contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,



Bruce A. Radke

Enclosure



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

RE: NOTICE OF DATA BREACH

Simpson University values and respects the privacy of your information, which is why we are writing to advise you of a recent incident that may have involved some of your personal information. We have no reason to believe that your personal information has been misused for the purpose of committing fraud or identity theft. Nonetheless, we want to make you aware of the incident and provide you with guidance on what you can do to protect yourself, should you feel it is appropriate to do so.

What Happened? We recently identified suspicious activity in certain Simpson University employee email accounts. Upon discovering the activity, we promptly secured the email accounts and began an internal investigation. We also engaged a forensic security firm to further investigate and confirm the security of our email and computer systems. This investigation determined that an unauthorized party temporarily gained access to certain of these email accounts between July 29, 2021 and September 17, 2021.

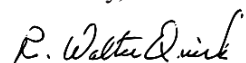
What Information Was Involved? Because an unauthorized party temporarily had access to the email accounts, we reviewed the accounts' contents to determine if they contained any personal information. On February 1, 2022, based on that review, we determined that the accounts contained your name, together with your <<b2b_text_1 (data elements)>>. The accounts may also have contained information from your education record, such as your major and your year in school (e.g., Freshman or Sophomore). Our investigation did not find evidence confirming that the third party actually viewed any of this information.

What We Are Doing. In addition to the actions described above, we have taken steps to reduce the risk of this type of incident occurring in the future, including enhancing our technical security measures. Although we are not aware of any instances of fraud or identity theft involving your personal information, we are offering a complimentary one-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 one-year membership, please see the additional information provided in this letter.**

What You Can Do. While we have no evidence that your personal information has been misused, we encourage you to take advantage of the complimentary credit monitoring included in this letter. Additionally, if your username/email address and password were contained in the accounts as reported in the *What Information Was Involved* section above, we recommend you promptly change your password. You can also find more information on steps to protect yourself against possible identity theft or fraud in the enclosed *Additional Important Information* sheet.

For More Information. We value the trust you place in us to protect your privacy, take our responsibility to safeguard your personal information seriously, and apologize for any inconvenience or concern this incident might cause. For further information and assistance, please call (855) 503-3401 from 6:00 a.m. – 3:30 p.m. Pacific, Monday through Friday, excluding some US holidays.

Sincerely,

A handwritten signature in black ink, reading "R. Walter Quirk". The signature is written in a cursive style with a large, stylized "R" and a long, sweeping underline.

R. Walter Quirk
Chief Operating Officer

ACTIVATING YOUR COMPLIMENTARY CREDIT MONITORING

To help protect your identity, we are offering a **complimentary** one-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: <<b2b_text_6 (date)>> (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**: <<Activation Code s_n>>

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 <<b2b_text_2 (engagement #)>> as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

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.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files 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.
- **Up to \$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.

** 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.

Additional Important Information

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft. For more information and to contact the FTC, please visit www.ftc.gov/idtheft or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

Credit Reports: You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print a copy of the request form at <https://www.annualcreditreport.com/manualRequestForm.action>.

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is as follows:

Equifax
1-866-349-5191
www.equifax.com
P.O. Box 740241
Atlanta, GA 30374

Experian
1-888-397-3742
www.experian.com
P.O. Box 2002
Allen, TX 75013

TransUnion
1-800-888-4213
www.transunion.com
P.O. Box 2000
Chester, PA 19016

Fraud Alerts: You may want to consider placing a fraud alert on your credit report. A fraud alert is free and will stay on your credit report for one (1) year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at www.annualcreditreport.com.

Credit and Security Freezes: You may have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A credit freeze can be placed without any charge and is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:

Equifax Security Freeze
1-888-298-0045
www.equifax.com
P.O. Box 105788
Atlanta, GA 30348

Experian Security Freeze
1-888-397-3742
www.experian.com
P.O. Box 9554
Allen, TX 75013

TransUnion Security Freeze
1-888-909-8872
www.transunion.com
P.O. Box 160
Woodlyn, PA 19094

This notification was not delayed by law enforcement.

Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting https://files.consumerfinance.gov/f/documents/bcfr_consumer-rights-summary_2018-09.pdf, or by requesting information in writing from the Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

Iowa Residents: Iowa residents can contact the Office of the Attorney general to obtain information about steps to take to avoid identity theft from the Iowa Attorney General's office at: Office of the Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines IA 50319, 515-281-5164.

Maryland Residents: Maryland residents can contact the Office of the Attorney General to obtain information about steps you can take to avoid identity theft from the Maryland Attorney General's office at: Office of the Attorney General, 200 St. Paul Place, Baltimore, MD 21202, (888) 743-0023, <http://www.marylandattorneygeneral.gov/>.

New York State Residents: New York residents can obtain information about preventing identity theft from the New York Attorney General's Office at: Office of the Attorney General for the State of New York, Bureau of Consumer Frauds & Protection, The Capitol, Albany, New York 12224-0341; <https://ag.ny.gov/consumer-frauds/identity-theft>; (800) 771-7755.

North Carolina Residents: North Carolina residents can obtain information about preventing identity theft from the North Carolina Attorney General's Office at: North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001; 877-5-NO-SCAM (Toll-free within North Carolina); 919-716-6000; www.ncdoj.gov.

Rhode Island Residents: We believe that this incident affected 2 Rhode Island residents. Rhode Island residents can contact the Office of the Attorney general at: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, (401) 274-4400, www.riag.ri.gov. You have the right to obtain any 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.