Penn
UNIVERSITY of PENNSYLVANIA
Office of Audit, Compliance and Privacy

CONSUMER PROTECTION DIVISION
RECEIVED
MAY 2 2022
OFFICE OF
THE ATTORNEY GENERAL

April 29, 2022

VIA OVERNIGHT MAIL

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

Re: Notice of Privacy Incident

To Whom It May Concern:

I am writing to let you know about a privacy incident that occurred at Wells Fargo, a third-party service provider of the University of Pennsylvania (the "University"), that affected two (2) residents of Maryland. On April 7, 2022, Wells Fargo informed the University that between October 14, 2021, and January 11, 2022, several checks made payable to the University and processed at a Wells Fargo lockbox facility were inappropriately accessed by a Wells Fargo employee who exposed or may have exposed electronic images of the check(s) to an unauthorized external party. Wells Fargo informed the University that it had also notified law enforcement.

The information accessed by the Wells Fargo employee included name, address, and bank account information. The University will be notifying the two (2) affected individuals to make them aware of this incident and provide them information to protect themselves against potential misuse of their information. Wells Fargo has agreed to provide complimentary two-year credit and identity monitoring services to the affected individuals, and the University will be providing the enrollment information for these services in its notification. Attached please find a copy of the sample notification that will be provided to individuals.

The University is committed to continuously evaluating and improving its processes to safeguard individuals' privacy and security. I am happy to answer any questions you may have and can be reached at 215-898-1934 or sschafer@upenn.edu.

Sincerely,

Scott D. Schafer
Chief University Privacy Officer and Institutional Compliance Officer
Office of Audit, Compliance and Privacy
University of Pennsylvania

[Penn Letterhead]

April 28, 2022

Name
Address
City, ST ZIP

Re: Notice of Privacy Incident

Dear **NAME**:

Wells Fargo provides the University of Pennsylvania ("University") with lockbox services for processing payment remittances made to the University, including payments we receive from you. We are writing to inform you of an incident involving a check you mailed to us that was processed at a Wells Fargo lockbox facility. The incident did not occur at the University, nor did it affect University systems.

What happened? Wells Fargo recently informed the University that between October 14, 2021, and January 11, 2022, several checks made payable to the University and processed at a Wells Fargo lockbox facility were inappropriately accessed by a Wells Fargo employee who exposed or may have exposed electronic images of the check to an unauthorized external party. A check you remitted during this time period was involved in the incident.

Wells Fargo informed the University that it has notified law enforcement, and the investigation of this incident is ongoing. This information and the timeframe referenced are current as of the date of this mailing.

What information was involved? The information involved included your name, address, and bank account information.

What we are doing? First, please accept our apologies for this unfortunate event. We take matters of privacy and security very seriously, and we recognize that this sort of incident may cause you concern. We recommend that you review this letter as well as the *Additional Resources* provided, for some steps you can take to protect yourself against potential misuse of your information.

We have obtained assurance from Wells Fargo that they are reviewing their security measures to reduce the likelihood of this happening in the future. Wells Fargo has also agreed to offer you a complimentary two-year subscription to Experian IdentityWorks[SM]. This product provides you with identity theft detection that includes daily monitoring of your credit reports from the three national credit reporting companies (Experian, Equifax, and TransUnion), internet surveillance, and resolution of identity theft.

Next Steps. To accept this offer, please activate your subscription within 60 days of the date printed on this letter. Enroll online at www.experianidworks.com/3bplus or call 1-877-890-9332, Monday through Friday, 8:00 a.m. to 8:00 p.m. Central Time and Saturday/Sunday, 10:00 a.m. – 7:00 p.m. Central Time. By law, we cannot enroll for you.

You will be asked to provide the following information for enrollment:

Activation Code: **CODE**
Engagement Number: **NUMBER**
Your Social Security number, email address, mailing address, phone number, and date of birth.

At the end of your free subscription, these services will be automatically canceled, and you will not be billed.

Additionally, you can take these important steps to protect your accounts and finances: (i) monitor balances and transactions for unfamiliar charges or withdrawals, (ii) review mail items and your credit report to identify any new credit offers or accounts, or increased limits on existing accounts that you did not initiate, and (iii) contact your financial institution to learn about steps you can take to protect against fraud, including any fraud prevention products and services offered by your institution.

We hope this information is helpful and again apologize for any inconvenience.

Should you have any questions regarding this matter, please do not hesitate to contact Heather Seitz at 215-573-2635.

Sincerely,

Heather Seitz
Director, Cash Management
University of Pennsylvania
3451 Walnut Street
Philadelphia, PA 19104
215-573-2635
heseitz@upenn.edu

Additional Resources

Enroll in Identity Monitoring

Take advantage of the Experian IdentityWorks subscription Wells Fargo is offering you.

Features of Experian IdentityWorks include:

- ***Experian® credit report at signup:*** *See what information is associated with your credit file. Daily credit reports are available for online members only.*
- ***Identity Restoration:*** *Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.*
- ***Credit Monitoring:*** *Actively monitors Experian®, Equifax® and TransUnion® files for indicators of fraud.*
- *Up to $1 Million Identity Theft Insurance: Provides coverage for certain costs and unauthorized electronic fund transfers.*
- ***Internet Surveillance:*** *Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.*
- ***Experian's IdentityWorks ExtendCARE****: You receive the same high level of Identity Restoration support even after your Experian IdentityWorks membership has expired*

Monitor Accounts

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

You have the right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security 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 security 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 security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian
PO Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion
P.O. Box 160
Woodlyn, PA 19094
1-888-909-8872
www.transunion.com/credit-freeze

Equifax
PO Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
www.equifax.com/personal/credit-report-services

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.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your 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 agencies listed below:

Experian
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016
1-800-680-7289
www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax
P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
www.equifax.com/personal/credit-report-services

Additional Information

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338); 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.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-410-528-8662, www.oag.state.md.us.