



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

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August 29, 2023

VIA E-MAIL

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
E-mail: idtheft@oag.state.md.us

Re: Gaston College - Notice of Data Event

To Whom It May Concern:

We represent Gaston College, located at 201 Highway 321 South, Dallas, NC 28034, and are writing to notify your office of an event that may affect the security of certain personal information relating to approximately one hundred twenty-three (123) Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Gaston College does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland data event notification statute, or personal jurisdiction.

Nature of the Data Event

On or about February 22, 2023, Gaston College became aware of suspicious activity within our server environment. We immediately worked to secure and restore our systems and launched an investigation, with assistance from the North Carolina Joint Cybersecurity Task Force, which is comprised of law enforcement, emergency management, N.C. National Guard Cyber, the Local Government Information Technology ("IT") Strike Team, state IT/cyber specialists and federal agencies, and further involved third-party cybersecurity specialists, in an effort to determine the nature and scope of the event. Through the investigation, it was determined that there was unauthorized access to Gaston College's network between February 21, 2023, and February 22, 2023. The investigation determined that the unauthorized actor had access to certain files and folders within its system during the period of access.

Gaston College engaged a third-party specialist to conduct a comprehensive programmatic and manual review of the involved files to determine the type of information contained within the files and to whom the information related. On July 11, 2023, this review was completed. Upon receipt of the results of the review, Gaston College conducted an additional review of its files for contact information to notify potentially impacted individuals about the event.

The information that could have been subject to unauthorized access includes name, Social Security number, driver's license number, financial account information, and medical/treatment information.

Notice to Maryland Residents

On or about August 25, 2023, Gaston College provided substitute notice via website and media notice. On or about August 29, 2023, Gaston College provided written notice of this event to approximately one hundred twenty-three (123) Maryland residents. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon discovering the event, Gaston College moved quickly to investigate and respond to the event, assess the security of Gaston College systems, and identify potentially affected individuals. Further, Gaston College notified federal law enforcement regarding the event. Gaston College is also working to implement additional safeguards and training for its employees.

Gaston College is providing access to credit monitoring services through Kroll, to individuals whose personal information was potentially affected by this event, at no cost to these individuals.

Additionally, Gaston College is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Gaston College is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Gaston College is providing written notice of this event to relevant state and federal regulators, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4554.

Very truly yours,

A handwritten signature in blue ink that reads "Matthew V. Toldero".

Matthew V. Toldero of
MULLEN COUGHLIN LLC

MVT/kzm
Enclosure

EXHIBIT A

GASTON COLLEGE

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

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

<<b2b_text_1 (NOTICE OF [SUBJECT HEADER])>>

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

Gaston College is writing to notify you of a recent event that may impact the security of some of your information. We are providing you with further information about the event, our response to it, and resources available to you to help protect your information, should you feel it appropriate to do so.

What Happened? On or about February 22, 2023, Gaston College became aware of suspicious activity within our server environment. We immediately worked to secure and restore our systems and launched an investigation, with assistance from the North Carolina Joint Cybersecurity Task Force, which is comprised of law enforcement, emergency management, N.C. National Guard Cyber, the Local Government Information Technology (“IT”) Strike Team, state IT/cyber specialists and federal agencies, and we further involved third-party cybersecurity specialists, in an effort to determine the nature and scope of the event. Through the investigation, it was determined that there was unauthorized access to Gaston College’s network between February 21, 2023, and February 22, 2023. The investigation determined that the unauthorized actor acquired certain files and folders within our system during the period of access.

We engaged a third-party specialist to conduct a comprehensive programmatic and manual review of the involved files to determine the type of information contained within the files and to whom the information related. On July 11, 2023, this review was completed. Upon receipt of the results of the review, we conducted an additional review of our files for contact information to notify potentially impacted individuals about the event.

What Information Was Involved? The investigation determined that your <<b2b_text_2 (Data Elements)>> were included within files that may have been accessed and/or acquired by an unauthorized individual.

What We Are Doing. We at Gaston College take this event and the security of your information seriously. Upon learning of this event, we moved quickly to investigate and respond to the event, assess the security of our systems, restore functionality to our environment, and notify potentially affected individuals. As part of our ongoing commitment to the privacy of personal information in our care, we are working to review our existing policies and procedures and to implement additional administrative and technical safeguards to further secure the information on our systems.

As an added precaution, we are also offering you free access to 12 months of complimentary identity monitoring services through Kroll at no cost to you. If you wish to activate the identity monitoring services, you may follow the instructions included in the *Steps You Can Take to Help Protect Personal Information*.

What You Can Do. Please review the enclosed *Steps You Can Take to Help Protect Personal Information*, which contains information on what you can do to better help protect against possible misuse of your information. You can also activate the complimentary identity monitoring services through Kroll. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity.

For More Information. We understand that you may have questions about this event that are not addressed in this letter. If you have additional questions, please call the dedicated assistance line at (866) 731-2279, Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time, excluding some major U.S. holidays. You can also write to Gaston College at ATTN: Systems, 201 Highway 321 South, Dallas, NC 28034.

We take the privacy and security of personal information in our care very seriously and sincerely regret any inconvenience or concern this event may have caused.

Sincerely,

Gaston College
<https://www.gaston.edu/>

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Activate the Identity Monitoring Services

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6 (Activation Date)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s_n>>

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to help protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their credit report.

Consumers have the right to place an initial or extended "fraud alert" on a credit 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a "credit freeze" on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer's express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in a consumer's name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;

4. Addresses for the prior two to 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, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-800-916-8800
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to help protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and 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. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state Attorney General. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; 202-727-3400; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active-duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage consumers to review their rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. [There are approximately \[#\] Rhode Island residents that may be impacted by this event.](#)