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October 24, 2023

VIA EMAIL (Idtheft@oag.state.md.us)

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

Re: HCI College – Incident Notification

Dear AG Anthony Brown,

McDonald Hopkins PLC represents HCI College, located at 1764 North Congress Ave., West Palm Beach, Florida 33409. I am writing to provide notification of a cybersecurity incident that impacted HCI College and may affect the security of personal information of approximately six (6) Maryland residents. HCI College's investigation is ongoing, and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any. By providing this notice, HCI College does not waive any rights or defenses regarding the applicability of Maryland law or personal jurisdiction.

On or about May 17, 2023, HCI College became aware of potentially unauthorized access to HCI College's network due to a ransomware cybersecurity incident. Upon learning of this issue, HCI College immediately contained the threat by disabling all unauthorized access to the network and commenced a prompt and thorough investigation. As part of the investigation, HCI College has been working very closely with external cybersecurity professionals experienced in handling these types of incidents. HCI College's forensic investigatory team did not observe the unauthorized party access or remove any sensitive data from the environment. However, the ability to determine if any data was accessed or taken was limited based on the evidence available. Regardless, out of an abundance of caution, HCI College conducted a thorough internal review of all the data which potentially could have been viewable or acquired by the unauthorized actor on or about May 17, 2023. HCI College determined on September 28, 2023 that some of personal information is maintained on the servers and potentially may have been accessed by the unauthorized party. HCI College confirmed that the impacted files contained personal information for individuals residing in Maryland including: full name and Social Security number. The mailing addresses were processed through the National Change of Addresses Database and received updated mailing information for residents on or about October 19, 2023.

HCI College has no indication that any information has been misused. Nevertheless, out of an abundance of caution, HCI College wanted to inform you (and affected residents) of the incident and to explain the steps that it is taking to help safeguard the affected residents against identity fraud. HCI College is providing the affected residents with written notification of this incident, commencing on or about October 25, 2023, in substantially the same form as the letter attached hereto. HCI College is also providing complimentary credit monitoring and identity theft protection services to individuals who have had their Social Security number impacted. HCI College is also advising the affected resident about the process for placing fraud alerts and/or security freezes on their credit files and obtaining free credit reports. The affected residents are also being provided with the contact information for the consumer reporting agencies, the Federal Trade Commission, and the Maryland Attorney General.

At HCI College, protecting the privacy of personal information is a top priority. HCI College is committed to maintaining the privacy of personal information in its possession and has taken many precautions to safeguard it. HCI College continually evaluates and modifies its practices and internal controls to enhance the security and privacy of personal information.

If you have any additional questions, please contact me at (312) 642-6131 or bdawson@mcdonaldhopkins.com.

Very truly yours,



Blair L. Dawson, FIP, CIPP/US, CIPP/E, CIPM

Encl.

HCI College
c/o Cyberscout
PO Box 1286
Dearborn, MI 48120-9998



October 25, 2023

IMPORTANT INFORMATION PLEASE REVIEW CAREFULLY

Dear [REDACTED]

The privacy and security of the personal information entrusted to us is of the utmost importance to HCI College. We are writing to provide you with information regarding a recent incident which involves the security of some of your personal information that was supplied to us. As such, we wanted to provide you with information about the incident, explain the services we are making available to you, and let you know that we continue to take significant measures to protect your information.

What Happened?

On May 17, 2023, HCI College detected unauthorized access to our network as a result of a cybersecurity incident that resulted in the potential exposure of the data we maintain.

What We Are Doing.

Upon learning of this issue, we contained the threat by disabling all unauthorized access to our network and immediately commenced a prompt and thorough investigation. As part of our investigation, we have been working very closely with external cybersecurity professionals experienced in handling these types of incidents. Our forensic investigatory team did not observe the unauthorized party access or remove any sensitive data from our environment. However, their ability to determine if any data was accessed or taken was limited based on the evidence available. Regardless, out of an abundance of caution, we conducted a thorough internal review of all the data which potentially could have been viewable or acquired by the unauthorized actor on or about May 17, 2023. We determined on September 28, 2023 that some of your personal information may have been impacted as a result of this incident.

What Information Was Involved?

The information that may have been accessed contained some of your personal information, including your full [REDACTED]

What You Can Do.

We have no evidence that any of your information has been used to commit financial fraud. Nevertheless, out of an abundance of caution, we want to make you aware of the incident and provide complimentary credit monitoring services as a precaution. In response to the incident, we are providing you with access to **Single Bureau Credit Monitoring/Single Bureau Credit Report/Single Bureau Credit Score** services at no charge. These services provide you with alerts for 12 (twelve) months from the date of enrollment when changes occur to your credit file. This notification is sent to you the same day that the change or update takes place with the bureau. Finally, we are providing you with proactive fraud assistance to help with any questions that you might have or in event that you become a victim of fraud. These services will be provided by Cyberscout through Identity Force, a TransUnion company specializing in fraud assistance and remediation services.

Although there is no evidence that your information has been misused, we encourage you to take full advantage of this service offering. This letter also provides other precautionary measures you can take to protect your personal

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information, including placing a Fraud Alert and/or Security Freeze on your credit files, and/or obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis.

How do I enroll for the free services?

To enroll in Credit Monitoring services at no charge, please log on to [REDACTED] and follow the instructions provided. When prompted please provide the following unique code to receive services: [REDACTED] In order for you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter. The enrollment requires an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

For More Information.

If you have any further questions regarding this incident, please call our dedicated and confidential toll-free response line that we have set up to respond to questions at [REDACTED] This response line is staffed with professionals familiar with this incident and knowledgeable on what you can do to protect against misuse of your information. The response line is available for 90 days from the date of this letter, between the hours of 8:00 a.m. to 8:00 p.m. Eastern time, Monday through Friday, excluding holidays. Please supply the representative with the unique code listed above.

Please accept our apologies that this incident occurred. We are committed to maintaining the privacy of personal information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices and internal controls to enhance the security and privacy of your personal information.

Sincerely,

HCI College
1764 N Congress Ave., Suite 200
West Palm Beach, FL 33409

– OTHER IMPORTANT INFORMATION –

1. Placing a Fraud Alert.

We recommend that you place a one-year “Fraud Alert” on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

Equifax

P.O. Box 105069
Atlanta, GA 30348-5069
www.equifax.com/personal/credit-report-services/credit-fraud-alerts/
(888) 378-4329

Experian

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

TransUnion

Fraud Victim Assistance Department
P.O. Box 2000
Chester, PA 19016
www.transunion.com/fraud-alerts
(800) 680-7289



2. Consider Placing a Security Freeze on Your Credit File.

If you are very concerned about becoming a victim of fraud or identity theft, you may request a “Security Freeze” be placed on your credit file at no cost. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by sending a request in writing, by mail, to all three nationwide credit reporting companies. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze

P.O. Box 105788
Atlanta, GA 30348-5788
www.equifax.com/personal/credit-report-services/credit-freeze/
(888) 298-0045

Experian Security Freeze

P.O. Box 9554
Allen, TX 75013
www.experian.com/freeze/center.html
(888) 397-3742

TransUnion Security Freeze

P.O. Box 160
Woodlyn, PA 19094
www.transunion.com/credit-freeze
(888) 916-8800

In order to place the security freeze, you will need to supply your name, address, date of birth, Social Security number and other personal information such as copy of a government issued identification. After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze. If you do place a security freeze prior to enrolling in a credit monitoring service, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

3. Obtaining a Free Credit Report.

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at **www.annualcreditreport.com**. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

4. Protecting Your Medical Information.

If this notice letter indicates that your medical information was impacted, we have no information to date indicating that your medical information involved in this incident was or will be used for any unintended purposes. As a general matter, however, the following practices can help to protect you from medical identity theft.

- Only share your health insurance cards with your health care providers and other family members who are covered under your insurance plan or who help you with your medical care.
- Review your “explanation of benefits statement” which you receive from your health insurance company. Follow up with your insurance company or care provider for any items you do not recognize. If necessary, contact the care provider on the explanation of benefits statement and ask for copies of medical records from the date of the potential access (noted above) to current date.

- Ask your insurance company for a current year-to-date report of all services paid for you as a beneficiary. Follow up with your insurance company or the care provider for any items you do not recognize.

5. Additional Helpful Resources.

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly. If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at www.ftc.gov/idtheft, by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.

Iowa Residents: You may contact law enforcement or the Iowa Attorney General's Office to report suspected incidents of identity Theft: Office of the Attorney General of Iowa, Consumer Protection Division, Hoover State Office Building, 1305 East Walnut Street, Des Moines, IA 50319, www.iowaattorneygeneral.gov, Telephone: 515-281-5164.

Maryland Residents: You may obtain information about avoiding identity theft from the Maryland Attorney General's Office: Office of the Attorney General of Maryland, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, www.marylandattorneygeneral.gov, Telephone: 888-743-0023.

New York Residents: You may obtain information about preventing identity theft from the New York Attorney General's Office: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; ag.ny.gov/consumer-frauds-bureau/identity-theft; Telephone: 800-771-7755.

North Carolina Residents: You may obtain information about preventing identity theft from the North Carolina Attorney General's Office: Office of the Attorney General of North Carolina, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 877-566-7226 (Toll-free within North Carolina), 919-716-6000.

Oregon Residents: You may obtain information about preventing identity theft from the Oregon Attorney General's Office: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us, Telephone: 877-877-9392.

New Mexico residents: You have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit. In addition, you have the right to obtain a security freeze (as explained above) or submit a declaration of removal. You have a right to bring a civil action against a consumer reporting agency that violates your rights under the Fair Credit Reporting and Identity Security Act.

Rhode Island Residents: You have the right to obtain a police report if one was filed, or alternatively, you can file a police report. Further, you can obtain information from the Rhode Island Office of the Attorney General about steps you can take to help prevent identity theft. You can contact the Rhode Island Attorney General at: 150 South Main Street, Providence, RI 02903, (401) 274-4400, www.riag.ri.gov. As noted above, you have the right to place a security freeze on your credit report at no charge, but note that consumer reporting agencies may charge fees for other services. To place a security freeze on your credit report, you must send a request to each of the three major consumer reporting agencies: Equifax, Experian, and TransUnion. These agencies can be contacted using the contact information provided above. In order to request a security freeze, you may need to provide the following information: your full name (including middle initial as well as Jr., Sr., II, III, etc.); Social Security number; date of birth; complete address; prior addresses; proof(s) of identification (state driver's license or ID card, military identification, birth certificate, etc.); and if you are a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft. When you place a security freeze on your credit report, within five (5) business days you will be provided with a personal identification number or password to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report for a specific period of time after the freeze is in place. To provide that authorization, you must contact the consumer reporting agency and provide all of the following: (1) the unique personal identification number or password provided by the consumer reporting agency; (2) proper identification to verify your identity; and (3) the proper information regarding the period of time for which the report shall be available to users of the credit report. There were two Rhode Island residents impacted.