



MULLEN
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426 W. Lancaster Avenue, Suite 200
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June 20, 2024

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: Notice of Data Event

To Whom It May Concern:

We represent Ventura County Credit Union (“VCCU”) located at 2575 Vista Del Mar Drive, Ventura, CA 93001, and are writing to notify your office of an incident that may affect the security of certain personal information relating to sixteen (16) Maryland residents. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, VCCU 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 January 30, 2024, VCCU became aware of suspicious activity in an employee email account. VCCU immediately launched an investigation, with the assistance of outside specialists, to determine the nature and scope of the activity. VCCU’s investigation determined that there was unauthorized access to one VCCU email account between January 29, 2024, and January 30, 2024. Therefore, VCCU reviewed the contents of the affected account to determine what, if any, sensitive information it contained. On April 15, 2024, VCCU completed this review and determined that the affected account contained certain information related to individuals.

The information that could have been subject to unauthorized access for Maryland residents includes name, Social Security number, and financial account information.

Notice to Maryland Residents

On June 20, 2024, VCCU began providing written notice of this incident to sixteen (16) 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, VCCU moved quickly to investigate and respond to the incident, assess the security of the email environment, and identify potentially affected individuals. VCCU notified federal law enforcement and notified its primary federal regulator, the National Credit Union Association (“NCUA”), of the incident on February 27, 2024. VCCU is also working to implement additional safeguards and training to its employees. VCCU is providing access to credit monitoring services for one (1) year, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, VCCU is providing impacted individuals with guidance on how to better protect against identity theft and fraud. VCCU 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.

VCCU is providing written notice of this incident 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) 930-4788.

Very truly yours,

Paul T. McGurkin, Jr. of
MULLEN COUGHLIN LLC

PTM/crm
Enclosure

EXHIBIT A



Secure Processing Center
P.O. Box 3826
Suwanee, GA 30024

Postal Endorsement Line

<<Full Name>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<City>>, <<State>> <<Zip>>
<<Country>>
***Postal IMB Barcode

<<Date>>

NOTICE OF <<VARIABLE HEADER – VAR DATA1>>

Dear <<Full Name>>:

Ventura County Credit Union (“VCCU”) writes to notify you of an incident that may affect the privacy of some of your information. Although we have no evidence of misuse of your information, this letter provides details of the incident, our investigation, and steps you can take to help protect your information should you feel it is appropriate to do so.

What Happened? On January 30, 2024, VCCU became aware of suspicious activity in an employee email account. We immediately launched an investigation, with the assistance of outside specialists, to determine the nature and scope of the activity. Our investigation determined that there was unauthorized access to one VCCU email account between January 29, 2024, and January 30, 2024. Therefore, we reviewed the contents of the affected account to determine what, if any, sensitive information it contained. On April 15, 2024, VCCU completed this review and determined that the affected account contained certain information related to you.

What Information Was Involved? VCCU determined that the following information related to you was present in the affected account at the time of this incident: <<Breached Elements>>.

What We Are Doing. VCCU takes the confidentiality, privacy, and security of information in its care seriously. Upon discovery of the incident, we immediately commenced an investigation to confirm the nature and scope of the incident. We are taking steps to implement additional safeguards and review our policies and procedures relating to data privacy and security, to continue guarding against similar incidents in the future.

VCCU is providing you with access to <<CM Length>> months of credit monitoring and identity protection services through Experian at no cost to you. A description of the services and instructions on how to enroll can be found within the enclosed *Steps You Can Take to Protect Personal Information*. Please note that you must complete the enrollment process yourself as we are not permitted to enroll you in these services.

What You Can Do. You can review the enclosed *Steps You Can Take to Protect Personal Information*. You can also enroll to receive the complimentary credit monitoring and identity protection services through Experian. We also encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity.

For More Information. We understand you may have questions about the incident that are not addressed in this letter. If you have questions, or need assistance, please call 888-499-5595, Monday through Friday from 6:00 a.m. to 6:00 p.m. Pacific Time. You may also write to VCCU at 2575 Vista Del Mar Drive, Suite 100, Ventura, CA 93001.

Sincerely,

Linda Rossi,
President and CEO
Ventura County Credit Union

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

To help protect your identity, we are offering a **complimentary** <<CM Length>> month membership to Experian IdentityWorksSM. 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 In Three Easy Steps

1. ENROLL by: <<EnrollmentDeadline>> (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>>

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 1-877-288-8057. Be prepared to provide engagement number <<Engagement #>> as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. 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.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* 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.

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 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) 442-9828; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-576-6300 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 <<RI #>> Rhode Island residents that may be impacted by this event.