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January 26, 2023

SUBMITTED VIA THE ONLINE PORTAL ONLY AT
<https://appengine.egov.com/apps/me/maine/ag/reportingform>

Aaron Frey
Office of the Attorney General
Consumer Protection Division
111 Sewall Street, 6th Floor
Augusta, ME 04330

Re: Stratford University - Security Breach Notification

Dear Mr. Frey:

We are writing on behalf of our client, Stratford University (“Stratford”) (located at 2900 Eisenhower Ave, Alexandria, VA 22314), to notify you of a data security incident involving thirteen (13) Maine residents.¹

Nature

On or about August 27, 2022, Stratford discovered that it was the victim of a ransomware incident that impacted its networks and servers. After discovering the incident, Stratford engaged our firm and third-party forensic and incident response experts to conduct a thorough investigation of the incident's nature and scope and to assist in the remediation efforts. Such remediation efforts included the implementation of endpoint detection and response software, password resets, and a review and audit of all accounts and software applications for up-to-date operating systems and security patches.

Stratford concluded its initial investigation on November 11, 2022. The investigation determined that on or about August 26, 2022, an unauthorized individual accessed Stratford’s systems and, as a result, obtained some data, including information containing student and employee records. At that time, Stratford began a comprehensive review of the impacted data to determine the types of protected information that may have been exposed and to identify individuals potentially impacted by the incident. Stratford recently determined that the incident potentially involved 13 Maine residents. Further, on or about January 20, 2023, Stratford located the most recent contact information for these individuals.

¹ By providing this notice, Stratford does not waive any rights or defenses regarding the applicability of Maine law, the applicability of the Maine data event notification statute, or personal jurisdiction.

The personal information obtained potentially included first and last name, phone number, address, e-mail address, date of birth, student identification number, passport number, and Social Security number.

Notice and Stratford's Response to the Event

On January 26, 2023, Stratford will mail a written notification to the potentially affected Maine residents, pursuant to 10 Me. Rev. Stat. § 1348, in a substantially similar form as the enclosed letter (attached as Exhibit A).

Additionally, Stratford is providing the potentially impacted individual the following:

- Free access to credit monitoring services for one year through TransUnion;
- Guidance on ways to protect against identity theft and fraud, including steps to report any suspected activities or events of identity theft or fraud to their credit card company and/or bank;
- The appropriate contact information for the consumer reporting agencies along with information on how to obtain a free credit report and place a fraud alert and security freeze on their credit file;
- 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 and law enforcement to report attempted or actual identity theft and fraud.

Further, Stratford provided notice to the applicable government regulators, officials, and other state Attorneys General (as necessary).

Contact Information

If you have any questions or wish to discuss this event further, please do not hesitate to call me on my direct dial (410) 456-2741 or email me at spollock@mcdonaldhopkins.com.

Sincerely Yours,

A handwritten signature in blue ink, appearing to read "Spencer S. Pollock".

Spencer S. Pollock, Esq., CIPP/US, CIPM

EXHIBIT A



Re: Notice of a Data Security Incident

Dear

The privacy and security of the personal information we maintain is of the utmost importance to Stratford University. We're writing with important information regarding a data security incident that involved some of your information. We want to provide you with information about the incident, explain the services we are providing to you, and let you know that we continue to take significant measures to protect your information.

What Happened?

On or about August 27, 2022, we detected a cyber incident impacting our systems. We launched an investigation into the incident with the assistance of third-party independent cybersecurity experts. We concluded our initial investigation and determined that on or about August 26, 2022, an unauthorized individual accessed our systems and, as a result, obtained some data, including information from our student database. At that time, we began a comprehensive review of the impacted data to identify all individuals whose information was involved. On December 29, 2022, we concluded our review and determined that the data contained some of your personal information. Therefore, we wanted to notify you of the incident and provide you with information on steps you can take to help protect your information.

What Information Was Involved?

The personal information included in the impacted data contained

What We Are Doing

The security and privacy of the information contained within our systems is a top priority for us. In response to this incident, we took immediate steps to secure our systems and engaged third-party forensic experts to assist in the investigation.

What You Can Do

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 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. In addition, we are providing you with proactive fraud assistance to help with any questions that you might have or in the event you become a victim of identity theft, as well as a \$1,000,000 insurance reimbursement policy. These services will be provided by Cyberscout through Identity Force, a TransUnion company specializing in fraud assistance and remediation 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.

Additionally, if you are interested in learning about how you can contact the Federal Trade Commission and obtain information from credit reporting agencies about fraud alerts and security freezes, you may refer to the "Other Important Information" included with this letter.

For More Information

We sincerely regret this incident occurred and for any concern it may cause. We understand that you may have questions about it beyond what is covered in this letter. If you have any additional questions, please contact the external, dedicated call center we set up at [REDACTED] between the hours of 8:00 am to 8:00 pm Eastern time, Monday through Friday, excluding holidays.

Sincerely,

Stratford University
2900 Eisenhower Ave
Alexandria, VA 22314

OTHER IMPORTANT INFORMATION

Obtain and Monitor Your Credit Report. We recommend that you obtain a free copy of your credit report from each of the three nationwide credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com>, calling toll-free 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 access the request form at <https://www.annualcreditreport.com/index.action>. Alternatively, you can elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. The three nationwide credit reporting agencies' contact information are provided below to request a copy of your credit report or general identified above inquiries.

<p align="center"><i>Equifax</i> P.O. Box 105069 Atlanta, GA 30348-5069 https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/ (800) 525-6285</p>	<p align="center"><i>Experian</i> P.O. Box 9554 Allen, TX 75013 https://www.experian.com/fraud/center.html (888) 397-3742</p>	<p align="center"><i>TransUnion</i> Fraud Victim Assistance Department P.O. Box 2000 Chester, PA 19016-2000 https://www.transunion.com/fraud-alerts (800) 680-7289</p>
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Security Freeze (also known as a Credit Freeze). Following is general information about how to request a security freeze from the three credit reporting agencies at no charge. While we believe this information is accurate, you should contact each agency for the most accurate and up-to-date information. A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit, mortgages, employment, housing, or other services. There might be additional information required, and as such, to find out more information, please contact the three nationwide credit reporting agencies (contact information provided below).

<p align="center"><i>Equifax Security Freeze</i> P.O. Box 105788 Atlanta, GA 30348-5788 https://www.equifax.com/personal/credit-report-services/credit-freeze/ (888)-298-0045</p>	<p align="center"><i>Experian Security Freeze</i> P.O. Box 9554 Allen, TX 75013 http://experian.com/freeze (888) 397-3742</p>	<p align="center"><i>TransUnion Security Freeze</i> P.O. Box 160 Woodlyn, PA 19094 https://www.transunion.com/credit-freeze (888) 909-8872</p>
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Consider Placing a Fraud Alert on Your Credit Report. You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least twelve months. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you before establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three nationwide credit reporting agencies identified above. Additional information is available at <https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>

Remain Vigilant, Review Your Account Statements and Notify Law Enforcement of Suspicious Activity. As a precautionary measure, we recommend that you remain vigilant by closely reviewing your account statements and credit reports. If you detect any suspicious activity on an account, we strongly advise that you promptly notify the financial institution or company that maintains the account. Further, you should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, including your state attorney general and the Federal Trade Commission (FTC). To file a complaint or to contact the FTC, you can (1) send a letter to the Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580; (2) go to IdentityTheft.gov/databreach; or (3) call 1-877-ID-THEFT (877-438-4338). Complaints filed with the FTC will be added to the FTC's Identity Theft Data Clearinghouse, a database made available to law enforcement agencies.

Take Advantage of Additional Free Resources on Identity Theft. We recommend that you review the tips provided by the Federal Trade Commission's Consumer Information website, a valuable resource with some helpful tips on how to protect your information. Additional information is available at <https://www.consumer.ftc.gov/topics/privacy-identity-online-security>. For more information, please visit IdentityTheft.gov



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or call 1-877-ID-THEFT (877-438-4338). In addition, a copy of Identity Theft – A Recovery Plan, a comprehensive guide from the FTC to help you guard against and deal with identity theft, can be found on the FTC's website at <https://www.consumer.ftc.gov/>.

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.oag.state.md.us/Consumer, 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; <https://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.

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

Washington D.C. Residents: You may obtain information about preventing identity theft from the Office of the Attorney General for the District of Columbia, 400 6th Street NW, Washington D.C. 20001, <https://oag.dc.gov/consumer-protection>, Telephone: 202-442-9828.

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New Mexico Residents: You have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf or www.ftc.gov.

*In Addition, New Mexico Consumers Have the Right to
Obtain a Security Freeze or Submit a Declaration of Removal*

As noted above, you may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, you will be provided with a personal identification number, password, or similar device to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report to a specific party or parties or for a specific period of time after the freeze is in place. To remove the freeze or to provide authorization for the temporary release of your credit report, you must contact the consumer reporting agency and provide all of the following:

1. The unique personal identification number, password, or similar device provided by the consumer reporting agency;
2. Proper identification to verify your identity; and
3. Information regarding the third party or parties who are to receive the credit report or the period of time for which the credit report may be released to users of the credit report.

A consumer reporting agency that receives a request from a consumer to lift temporarily a freeze on a credit report shall comply with the request no later than three business days after receiving the request. As of September 1, 2008, a consumer reporting agency shall comply with the request within fifteen minutes of receiving the request by a secure electronic method or by telephone.

A security freeze does not apply in all circumstances, such as where you have an existing account relationship and a copy of your credit report is requested by your existing creditor or its agents for certain types of account review, collection, fraud control, or similar activities; for use in setting or adjusting an insurance rate or claim or insurance underwriting; for certain governmental purposes; and for purposes of prescreening as defined in the federal Fair Credit Reporting Act.

If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze, either completely if you are shopping around or specifically for a certain creditor, with enough advance notice before you apply for new credit for the lifting to take effect. You should contact a consumer reporting agency and request it to lift the freeze at least three business days before applying. As of September 1, 2008, if you contact a consumer reporting agency by a secure electronic method or by telephone, the consumer reporting agency should lift the freeze within fifteen minutes. 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.

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. You may contact these agencies using the contact information provided above.

Rhode Island Residents: You may contact law enforcement, such as the Rhode Island Attorney General's Office, to report incidents of identity theft or to learn about steps you can take to protect yourself from identity theft. You can contact the Rhode Island Attorney General at: Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, www.riag.ri.gov, 401-274-4400.

As noted above, you may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You have a right to place a "security freeze" on your credit report pursuant to chapter 48 of title 6 of the Identity Theft Prevention Act of 2006.

The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, within five (5) business days you will be provided 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.
3. The proper information regarding the period of time for which the report shall be available to users of the credit report.

A consumer reporting agency that receives a request from a consumer to temporarily lift a freeze on a credit report shall comply with the request no later than three (3) business days after receiving the request.

A security freeze does not apply to circumstances where you have an existing account relationship and a copy of your report is requested by your existing creditor or its agents or affiliates for certain types of an account review, collection, fraud control, or similar activities.

If you are actively seeking a new credit, loan, utility, telephone, or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze -- either completely, if you are shopping around, or specifically for a certain creditor -- with enough advance notice before you apply for new credit for the lifting to take effect.

You have a right to bring a civil action against someone who violates your rights under the credit reporting laws. The action can be brought against a consumer reporting agency or a user of your credit report.

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:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Complete address;
5. Prior addresses;
6. Proof(s) of identification (state driver's license or ID card, military identification, birth certificate, etc.);
7. 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.

There were 12 Rhode Island residents impacted by this incident.



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