



LEWIS BRISBOIS BISGAARD & SMITH LLP

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December 27, 2021

**VIA ONLINE SUBMISSION**

Attorney General Aaron Frey  
Maine Attorney General's Office  
Consumer Protection Division  
6 State House Station  
Augusta, ME 04333

Re: Notice of Data Incident

Dear Attorney General Frey:

We represent the University of Southern California ("USC"), a private research university located in Los Angeles, California. This letter is being sent because personal information belonging to a Maine resident may have been involved in a potential data security incident. The potentially affected information included the resident's name and Social Security number.

On October 1, 2021, USC learned that a professor misplaced an external hard drive on or about September 28, 2021. In response, USC initiated an investigation and a review of available backups of the hard drive data to identify whether it contained personal information. The investigation determined that the hard drive contained academic information, including grade sheets and other similar documents, for certain current and former USC students, after which USC undertook efforts to identify all potentially affected individuals. In December 2021, USC identified one (1) potentially affected Maine resident whose information may have been involved.

USC has no evidence that any information involved in this incident has been misappropriated. Out of an abundance of caution, USC notified the potentially affected Maine resident of this incident via the attached sample letter on December 17, 2021. In so doing, USC offered notified individuals complimentary identity protection services through IDX, a data incident and recovery services expert. These services include credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services.

USC takes the privacy and security of all information in its possession very seriously. If you have any questions or need additional information, please do not hesitate to contact me at (971) 712-2795

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or [Sean.Hoar@lewisbrisbois.com](mailto:Sean.Hoar@lewisbrisbois.com), or Aubrey Weaver at (215) 253-7506 or  
[Aubrey.Weaver@lewisbrisbois.com](mailto:Aubrey.Weaver@lewisbrisbois.com).

Sincerely,



Sean B. Hoar of  
LEWIS BRISBOIS BISGAARD & SMITH LLP

Encl.: Sample Consumer Notification Letter

University of Southern California  
Return to IDX  
10300 SW Greenburg Rd. Suite 570  
Portland, OR 97223



<<First Name>> <<Last Name>>  
<<Address1>> <<Address2>>  
<<City>>, <<State>> <<Zip>>

To Enroll, Please Call:  
1-833-820-0961  
Or Visit:  
<https://app.idx.us/account-creation/protect>  
Enrollment Code: <<XXXXXXXXXX>>

December 17, 2021

**Re: Notice of Data <<Variable 1>>**

Dear <<FirstName>> <<LastName>>,

We are writing to provide you with information about a recent data security incident that may have involved your personal information. At the University of Southern California (“USC”), we strive to maintain the privacy and security of all information within our possession. As explained below, we have no evidence that your information has been misappropriated. Out of an abundance of caution, however, we are writing to notify you of this incident, offering complimentary identity monitoring and identity theft restoration services, and informing you about steps you can take to help safeguard your personal information.

**What Happened.** On October 1, 2021, USC learned that a professor lost an external hard drive on or about September 28, 2021. In response, USC initiated an investigation and a review of available backups of the hard drive data to identify whether it contained personal information. The investigation determined that the hard drive contained student academic information, including grade sheets and other similar documents. On November 18, 2021, our review indicated that some of your information may have been stored on the hard drive.

As referenced above, USC is not aware of any misuse of information stored on the lost hard drive. Nonetheless, out of an abundance of caution, we are notifying you of this incident and offering resources to help you protect your personal information.

**What Information Was Involved.** The potentially affected information may have included your name and Social Security number.

**What We Are Doing.** As soon as we discovered this incident, we took the steps described above. USC has also reviewed its data security policies with the professor in an effort to prevent a similar incident occurring in the future.

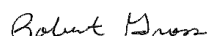
Additionally, USC is providing you with information about steps that you can take to help protect your personal information and, as an added precaution, is offering you complimentary identity theft protection services through IDX, a data breach and recovery services expert. IDX identity protection services include: <<membership offering length>> of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised. The deadline to enroll is March 17, 2022.

**What You Can Do.** We recommend that you activate your complimentary IDX services using the enrollment code provided above. A description of the services being provided are included with this letter. We also recommend that you review the guidance included with this letter about steps you can take to protect your personal information.

**For More Information.** If you have questions or need assistance, please contact IDX at 1-833-820-0961, Monday through Friday from 6:00 am to 6:00 pm Pacific Time, excluding major U.S. holidays. IDX representatives are fully versed on this incident and can answer any questions you may have regarding the protection of your personal information.

USC takes this matter very seriously. Please accept our sincere apologies and know that we deeply regret any worry or inconvenience that this may cause you.

Sincerely,

A handwritten signature in cursive script that reads "Robert Gross".

Robert (Bob) Gross  
Director, Data Privacy

University of Southern California  
Office of Culture, Ethics and Compliance,  
University Gardens Building, Suite 105,  
Los Angeles, CA 90089-8007

## Steps You Can Take to Protect Your Personal Information

**Review Your Account Statements and Notify Law Enforcement of Suspicious Activity:** As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

**Copy of Credit Report:** You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 1-877-322-8228, 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 also can contact one of the following three national credit reporting agencies:

### **Equifax**

P.O. Box 105851  
Atlanta, GA 30348  
1-800-525-6285  
[www.equifax.com](http://www.equifax.com)

### **Experian**

P.O. Box 9532  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com](http://www.experian.com)

### **TransUnion**

P.O. Box 1000  
Chester, PA 19016  
1-800-916-8800  
[www.transunion.com](http://www.transunion.com)

**Fraud Alert:** 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 one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

**Security Freeze:** You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

**Additional Free Resources:** You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

### **Federal Trade Commission**

600 Pennsylvania Ave, NW  
Washington, DC 20580  
[consumer.ftc.gov](http://consumer.ftc.gov), and  
[www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)  
1-877-438-4338

### **Maryland Attorney General**

200 St. Paul Place  
Baltimore, MD 21202  
[oag.state.md.us](http://oag.state.md.us)  
1-888-743-0023

### **New York Attorney General**

Bureau of Internet and Technology  
Resources  
28 Liberty Street  
New York, NY 10005  
1-212-416-8433

### **North Carolina Attorney General**

9001 Mail Service Center  
Raleigh, NC 27699  
[ncdoj.gov](http://ncdoj.gov)  
1-877-566-7226

### **Rhode Island Attorney General**

150 South Main Street  
Providence, RI 02903  
<http://www.riag.ri.gov>  
1-401-274-4400

### **Washington D.C. Attorney General**

441 4th Street, NW  
Washington, DC 20001  
[oag.dc.gov](http://oag.dc.gov)  
1-202-727-3400

**You also have certain rights under the Fair Credit Reporting Act (FCRA):** These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.