



MULLEN
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October 21, 2020

VIA E-MAIL

Office of the Attorney General
Bob Ferguson
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
E-mail: SecurityBreach@atg.wa.gov

Re: Notice of Data Event

Dear Attorney General Ferguson:

We represent Carroll College, located at 1601 N. Benton Ave., Helena, MT 59625 and are writing on behalf of Carroll College to notify your office of an incident that may affect the security of personal information relating to 2,166 Washington residents. This notice will be supplemented in the event any new significant facts are learned following the submission of this notice. By providing this notice, Carroll College does not waive any rights or defenses regarding the applicability of Washington law, the applicability of the Washington data event notification statute, or personal jurisdiction.

Nature of the Data Event

On July 16, 2020, Carroll College received notification from one of its third-party vendors, Blackbaud, Inc. ("Blackbaud"), of a cyber incident. Blackbaud reported that it experienced a ransomware incident in May 2020 that resulted in encryption of certain Blackbaud systems. Blackbaud reported the incident to law enforcement and worked with forensic investigators to determine the nature and scope of the incident. Following its investigation, Blackbaud notified its customers that an unknown actor may have accessed or acquired certain Blackbaud customer data. Blackbaud reported that data may have been accessed or exfiltrated by the threat actor at some point before Blackbaud locked the threat actor out of the environment on May 20, 2020. Upon learning of the Blackbaud incident, Carroll College immediately commenced

an investigation to determine what, if any, sensitive Carroll College data was potentially involved. This investigation included working diligently to gather further information from Blackbaud to understand the scope of the incident, as well as undertake diligent efforts to assess what Carroll College data was present in the Blackbaud system.

Pursuant to Wash. Rev. Code § 19.255.005(2)(a), the Personal Information that may have been subject to unauthorized access includes name and date of birth.

Notice to Washington Residents

On October 21, 2020, Carroll College provided written notice of this incident to the individuals potentially involved, which included 2,166 Washington 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 learning of this incident, Carroll College immediately commenced an investigation. As part of its ongoing commitment to the security of information in its care, Carroll College is working to review its existing policies and procedures regarding its third-party vendors, and is working with Blackbaud to evaluate additional measures and safeguards to protect against this type of incident in the future.

Upon discovering the event, Carroll College moved quickly to investigate and respond to the incident, including working with Blackbaud to learn more about the incident and to determine what Carroll College data may be involved. Carroll College then worked diligently to identify and notify those individual whose information may have been involved. Carroll College is encouraging involved individuals to remain vigilant against incidents of identity theft and fraud, to review their account statements, and to monitor their credit reports for suspicious activity. Additionally, Carroll College is providing potentially impacted individuals with the contact details for the national consumer reporting agencies.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4784.

Very truly yours,



Jeff Boogay of
MULLEN COUGHLIN LLC

EXHIBIT A

[Carroll College Letterhead]

[Date]

[Name]

[Street Address]

[City, State, Zip Code]

Dear [Name]:

We write to inform you of a recent incident that may affect the privacy of some of your information. On Thursday, July 16, 2020, we received notification from one of our third-party vendors, Blackbaud, Inc. (“Blackbaud”), of a cyber incident. Blackbaud is a cloud computing provider that offers customer relationship management and financial services tools to organizations, including Carroll College. Upon receiving notice of the cyber incident, Carroll College immediately commenced an investigation to determine what, if any, sensitive Carroll College data was potentially involved. **This notice provides information about the Blackbaud incident and our response.**

Blackbaud informed us that, in May 2020, it experienced a ransomware incident that resulted in encryption of certain Blackbaud systems. The company reported the incident to law enforcement and worked with forensic investigators to determine the nature and scope of the incident. Following its investigation, Blackbaud notified its customers that an unknown actor may have accessed or acquired certain Blackbaud customer data at some point before Blackbaud locked the threat actor out of its environment on May 20, 2020.

Carroll College has worked diligently to gather further information from Blackbaud in order to fully understand the scope of the incident. Our investigation determined that **the Blackbaud system impacted is a database of aggregate donor information that may have contained your name, contact information, date of birth, and giving information. Please note that, to date, we have not received confirmation from Blackbaud that your specific information was accessed or acquired by the unknown perpetrator.**

The information not impacted by the breach was Social Security numbers, driver’s license numbers, financial account information, payment card information, or similar high-risk data.

The confidentiality, privacy, and security of information in our care are among our highest priorities, and we take this incident very seriously. As part of our ongoing commitment to the security of information in our care, we are working to review our existing policies and procedures regarding our third-party vendors, and are working with Blackbaud to evaluate additional measures and safeguards to protect against this type of incident in the future.

As an added precaution, we 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. Below you will find contact information for the three nationwide consumer reporting agencies.

Experian

P.O. Box 9554

Allen, TX 75013

1-888-397-3742

www.experian.com/freeze/center.html

TransUnion

P.O. Box 160

Woodlyn, PA 19094

1-888-909-8872

www.transunion.com/credit-freeze

Equifax

P.O. Box 105788

Atlanta, GA 30348-5788

1-800-685-1111

www.equifax.com/personal/credit-report-services

We understand that you may have questions about the Blackbaud incident that are not addressed in this letter. If you have additional questions, please call our office at [internal number or call center phone number] between the hours of [XXX and XXX]. You can also write to Carroll College at [address].

We regret any inconvenience or concern this incident may cause.

Sincerely,

[Signature]

Michael McMahon
Vice President for Institutional Advancement
Carroll College