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December 9, 2020

File No. 6234.14108

VIA EMAIL

Attorney General Bob Ferguson
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504
SecurityBreach@atg.wa.gov

Re: Notification of Data Security Incident

Dear Attorney General Ferguson:

We represent the City University of Seattle ("City University"), a private non-profit university located at 521 Wall Street #100, Seattle, WA 98121, in connection with a recent data security incident described below. City University has notified the affected individuals of the incident. The purpose of this letter is to provide formal notice to your office.

I. Nature of Security Incident

City University recently detected a potential data security incident affecting digital environment. City University immediately launched an investigation and engaged a digital forensics firm to assist. The investigation determined that consumer personal information ("PI") may have been accessed or acquired without authorization, including dates of birth, student identification numbers, driver's license numbers, passport numbers, military identification numbers, other government identification numbers, health insurance information, medical information, and online account credentials.

II. Number of Washington Residents Affected

City University has notified 1,097 Washington residents of this incident. Notification letters were mailed via First-Class Mail on December 8, 2020. A sample copy of that notification letter is enclosed.

III. Actions Taken in Response to the Incident

As soon as City University detected a potential incident, it launched an investigation, engaged a digital forensics firm, and worked to determine whether any PI was accessed or acquired without

authorization. City University also reported the incident to the Federal Bureau of Investigation and will provide law enforcement whatever assistance is needed.

Once City University identified the PI involved, the consumers affected by the incident, and current contact information for those consumers, it immediately began the process of notifying them. As part of that notice, City University provided consumers with information about steps they can take to protect their personal information and recommended that they review their account statements and report any discrepancies to their financial institutions. In addition, City University has offered affected consumers free identity protection services, including credit monitoring, for 12 months. City University has also adopted enhanced security measures to prevent similar incidents in the future.

IV. Contact Information

If you have any questions or need additional information, please do not hesitate to contact me at 206.455.7415 or Ethan.Smith@lewisbrisbois.com.

Very truly yours,

/s Ethan A. Smith
Ethan A. Smith of
LEWIS BRISBOIS BISGAARD & SMITH LLP

EAS

Encl. Consumer Notification Letter

CITY UNIVERSITY

City University of Seattle
c/o IDX
[IDX ADDRESS]

<<Date>>

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

To enroll, please call:
[CALL CENTER PHONE]
or visit:
[ENROLLMENT URL]
Enrollment Code: [ENROLLMENT CODE]

Re: Notice of Data Security Incident

Dear <<First Name>> <<Last Name>>,

I am writing to inform you of a data security incident that may have involved your personal information. At the City University of Seattle ("City University"), we take the privacy and security of your information very seriously. This is why I am notifying you of the incident, offering you free identity protection services, and informing you about steps you can take to help protect your personal information.

What Happened? City University recently detected an incident that may have affected personal information and immediately launched an investigation. We engaged a digital forensics firm to assist with the investigation and determine whether personal information may have been accessed. At the conclusion of that investigation, we determined that your personal information may have been accessed.

What Information Was Involved? The information involved included your: name; <<FIELD 1>>.

What Are We Doing? As soon as we discovered the incident, we took the steps described above. We have implemented enhanced security measures to prevent similar incidents in the future. We also notified the Federal Bureau of Investigation and will provide whatever cooperation is necessary to hold the perpetrators accountable. In addition, we are providing you with information about steps you can take to help protect your personal information and offering you <<duration>> of free identity protection services through IDX.

What You Can Do: You can follow the recommendations included with this letter to protect your personal information. We strongly encourage you to enroll in the identity protection services we are offering through IDX. To enroll, please visit [ENROLLMENT URL] or call [CALL CENTER PHONE] and provide the following enrollment code: <<enrollment code>>.

Note that to receive credit monitoring services, you must be over the age of 18, have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

Please note you must enroll by <<enrollment deadline>>. If you have questions or need assistance, please call IDX at [CALL CENTER PHONE].

For More Information: If you have any questions about this letter, please contact IDX at [CALL CENTER PHONE], Monday through Friday, [CALL CENTER HOURS] Pacific Time. Please accept our sincere apologies and know that we deeply regret any worry or inconvenience that this may cause you.

Sincerely,

Randy Frisch
President
City University of Seattle

CITY UNIVERSITY

Steps You Can Take to Further Protect Your 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 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 print this form at https://www.annualcreditreport.com/cra/requestformfinal.pdf. You also can contact one of the following three national credit reporting agencies:

TransUnion	**Experian**	**Equifax**	**Free Annual Report**
P.O. Box 1000	P.O. Box 9532	P.O. Box 105851	P.O. Box 105281
Chester, PA 19016	Allen, TX 75013	Atlanta, GA 30348	Atlanta, GA 30348
1-800-916-8800	1-888-397-3742	1-800-525-6285	1-877-322-8228
transunion.com	experian.com	equifax.com	annualcreditreport.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 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that creditors 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 www.annualcreditreport.com.

Security Freeze: Under U.S. law, 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. Residents of Maryland, North Carolina, and Rhode Island can obtain more information from their Attorneys General using the contact information below.

Federal Trade Commission	**Maryland Attorney General**	**North Carolina Attorney General**	**Rhode Island Attorney General**
600 Pennsylvania Ave NW	200 St. Paul Place	9001 Mail Service Center	150 South Main Street
Washington, DC 20580	Baltimore, MD 21202	Raleigh, NC 27699	Providence, RI 02903
consumer.ftc.gov	oag.state.md.us	ncdoj.gov	riag.ri.gov
ftc.gov/idtheft	1-888-743-0023	1-877-566-7226	401-274-4400
1-877-438-4338			

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 others. For more information about the FCRA, and your rights pursuant to the FCRA, please visit: http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf