



MULLEN  
COUGHLIN<sup>LLC</sup>  
ATTORNEYS AT LAW

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September 1, 2020

**VIA E-MAIL**

Office of the Attorney General  
1125 Washington Street SE  
PO Box 40100  
Olympia, WA 98504-0100  
E-mail: [securitybreach@atg.wa.gov](mailto:securitybreach@atg.wa.gov)

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent Guide Dogs for the Blind, Inc. (“GDB”), located at 350 Los Ranchitos Road, San Rafael, California 94903, and are writing to notify you of an incident that may affect the security of the personal information of certain Washington residents. The investigation into this event is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to this submission. By providing this notice, GDB does not waive any rights or defenses regarding the applicability of Washington law or personal jurisdiction.

**Nature of the Data Event**

On July 16, 2020, GDB was notified by its third-party vendor, Blackbaud, that between February and May 2020, Blackbaud experienced a data security incident that resulted in the unauthorized acquisition of data impacting a large group of the organizations to whom they provide services, including GDB. Blackbaud is a cloud software provider that provides GDB and many other nonprofit organizations and educational institutions with database and relationship management services.

In its initial communication, Blackbaud reported that, in May 2020, it experienced a ransomware incident 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 the data was exfiltrated by the threat actor at some point before Blackbaud locked the threat actor out of the environment on May 20, 2020. Upon receiving notice from Blackbaud, GDB began its own internal investigation into the information reported by Blackbaud and the impact on data maintained in the impacted systems on behalf of GDB. Based on the GDB ongoing investigation, on August 6, 2020, it was determined the personal information that could have been subject to unauthorized access or acquisition included names and dates of birth.

### Notice to Washington Residents

GDB began providing notice of this incident to 8,169 Washington residents on September 1, 2020, in substantially the same form as the notice attached hereto as *Exhibit A*.

### Other Steps Taken and To Be Taken

Promptly after Blackbaud notified GDB of the issue, it took steps to determine its nature and scope, including whether any personal information was impacted. GDB continues to investigate this issue in coordination with Blackbaud. Blackbaud confirmed that it is making enhancements to its systems to help detect and prevent unauthorized access to information, including (1) hardening its controls related to access management, network segmentation, and endpoint and network-based protection; and (2) accelerating its efforts strengthen its password requirements and implement multi-factor authentication for its self-hosted solutions. Blackbaud also has engaged third-party experts to actively monitor for suspicious activity involving GDB data. In addition, GDB understands that Blackbaud has consulted with law enforcement on this issue. Based on the investigation, and the information received from Blackbaud, at this time, GDB has no evidence that any of the information has been misused as a result of this issue.

Additionally, GDB is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. GDB is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, 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.

### Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4786.

Very truly yours,

A handwritten signature in blue ink that reads "Ryan Loughlin". The signature is written in a cursive, flowing style.

Ryan C. Loughlin of  
MULLEN COUGHLIN LLC

RCL/amw  
Enclosure

# **EXHIBIT A**



# Guide Dogs for the Blind

Return Mail Processing Center  
P.O. Box 6336  
Portland, OR 97228-6336

<<Mail ID>>  
<<Name 1>>  
<<Name 2>>  
<<Address 1>>  
<<Address 2>>  
<<Address 3>>  
<<Address 4>>  
<<Address 5>>  
<<City>><<State>><<Zip>>  
<<Country>>

<<Date>>

Dear <<Name 1>>:

Guide Dogs for the Blind, Inc. (“GDB”) writes to inform you of a recent incident that may affect the privacy of some of your information. On Thursday, July 16, 2020, GDB received notification from one of its 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 GDB. Upon receiving notice of the cyber incident, GDB immediately commenced an investigation to better understand the nature and scope of the incident and any impact on GDB data. This notice provides information about the Blackbaud incident, our response, and resources available to you to help protect your information from possible misuse, should you feel it necessary to do so.

Blackbaud reported that in May 2020, it experienced a ransomware incident. Blackbaud reported the incident to law enforcement and worked with forensic investigators to investigate. Following its investigation, Blackbaud notified its customers that an unknown perpetrator may have accessed or acquired certain Blackbaud customer data. Blackbaud reported that data was exported by the unknown perpetrator at some point before Blackbaud locked the unknown perpetrator out of the environment on May 20, 2020. Blackbaud also reports that the perpetrator deleted the copy of the data that may have been taken. Upon learning of the Blackbaud incident, GDB immediately began to determine what, if any, sensitive GDB data was potentially involved. This investigation included working diligently to gather further information from Blackbaud to understand the scope of the incident. On or about August 5, 2020, GDB received further information from Blackbaud that allowed us to determine the information potentially affected may have contained personal information.

Our investigation determined that the involved Blackbaud systems may have contained your name, contact information, date of birth, and giving history. **Please note that no GDB donor credit card information was involved, and Blackbaud’s investigators have not seen any signs of misuse of the data involved. Nor have we received any information from Blackbaud that your information was specifically accessed by the unknown perpetrator.**

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. We will also be notifying state and federal regulators, as required.

We encourage you to review the enclosed *Steps You Can Take to Help Protect Your Information*. There you will find general information on what you can do to help protect your personal information.

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 dedicated assistance line at 855-907-2144, Monday through Friday, between the hours of 6 am to 6 pm Pacific Time.

We sincerely regret this incident occurred and are sorry for any concern or inconvenience it has caused. We thank you so much for your interest in our mission and allowing Guide Dogs for the Blind to continue its life-changing work.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine Benninger". The signature is fluid and cursive, with a large initial "C" and "B".

Christine Benninger  
President and CEO

## *Steps You Can Take to Help Protect Your Information*

### **Monitor Accounts**

In general, 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. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

#### **Experian**

P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

#### **TransUnion**

P.O. Box 160  
Woodlyn, PA 19094  
1-888-909-8872  
[www.transunion.com/credit-freeze](http://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](http://www.equifax.com/personal/credit-report-services)

In order to request a security freeze, you will 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. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior 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, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your 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 you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

#### **Experian**

P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com/fraud/center.html](http://www.experian.com/fraud/center.html)

#### **TransUnion**

P.O. Box 2000  
Chester, PA 19016  
1-800-680-7289  
[www.transunion.com/fraud-victim-resource/place-fraud-alert](http://www.transunion.com/fraud-victim-resource/place-fraud-alert)

#### **Equifax**

P.O. Box 105069  
Atlanta, GA 30348  
1-888-766-0008  
[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

### **Additional Information**

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, [www.identitytheft.gov](http://www.identitytheft.gov), 1-877-ID-THEFT (1-877-438-4338); 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. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General.