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September 23, 2020

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VIA E-MAIL (SECURITYBREACH@ATG.WA.GOV)

Attorney General Bob Ferguson
Office of the Attorney General
Consumer Protection Division
800 5th Avenue, Suite 2000
Seattle, Washington 98104

Re: Notification of a Data Security Incident

Dear Attorney General Ferguson:

We represent Point Loma Nazarene University (“PLNU”) in connection with a recent incident that may have impacted the personal information of 1,967 Washington residents, and we provide this notice on behalf of PLNU pursuant to Wash. Rev. Code § 19.255.010. This notice will be supplemented, if necessary, with any new, significant facts discovered subsequent to its submission. While PLNU is notifying you of this incident, PLNU does not waive any rights or defenses relating to the incident, this notice, or the applicability of Washington law on personal jurisdiction.

NATURE OF THE SECURITY BREACH OR UNAUTHORIZED USE OR ACCESS

PLNU contracts with the company Blackbaud, Inc. (“Blackbaud”) to store its donor information within Blackbaud’s self-hosted environment. Blackbaud recently notified PLNU that Blackbaud was impacted by a ransomware event where certain data, including some of PLNU’s donors’ data, was exfiltrated out of Blackbaud’s systems between April 18, 2020, through May 7, 2020. PLNU has since worked diligently to identify the donors whose personal information was contained in the Blackbaud systems, which includes certain Washington residents’ names, dates of birth, and student identification numbers. While PLNU is not aware of any fraud or identity theft to any individual as a result of this incident and cannot confirm if any personal information was actually obtained by an unauthorized party, PLNU is notifying the potentially impacted Washington residents.

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Attorney General Bob Ferguson
September 23, 2020
Page 2

NUMBER OF WASHINGTON RESIDENTS AFFECTED

The incident is believed to have impacted 1,967 Washington residents. PLNU is mailing a notification letter to impacted individuals today, September 23, 2020. Enclosed is a sample of the notice letters that are being sent to the potentially impacted residents via first-class United States mail.

STEPS TAKEN RELATING TO THE INCIDENT

Upon learning of the incident, PLNU conducted a comprehensive search for any personal information stored in the Blackbaud systems. PLNU is formally notifying the potentially impacted Washington residents. PLNU is further reviewing its relationship with Blackbaud and the technical controls in place for securing PLNU's data in the Blackbaud system.

CONTACT INFORMATION

Please contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Bruce A. Radke".

Bruce A. Radke

Enclosure

POINT¹⁹ LOMA

NAZARENE UNIVERSITY

Point Loma Nazarene University
University Advancement
3900 Lomaland Drive
San Diego, CA 92106

<<Mail ID>>

<<Name 1>>

<<Name 2>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<Address 4>>

<<Address 5>>

<<City>><<State>><<Zip>>

<<Country>>

<<Date>>

Dear <<Name 1>>:

Point Loma Nazarene University (“we,” “us,” or “our”) is writing to advise you of a recent data security incident involving a company called Blackbaud, Inc. (“Blackbaud”). We contract with Blackbaud to store our alumni/donor information within Blackbaud’s self-hosted environment.

On July 17, 2020, Blackbaud notified us, as well as hundreds of other organizations that use its products, that it was impacted by a ransomware event. According to Blackbaud, in May 2020, ransomware was deployed within Blackbaud’s environment and some of its data was exfiltrated out of its systems. Blackbaud encrypts most of the data it stores, but some of the less sensitive fields are left unencrypted. As a result, the person who gained access to Blackbaud’s network could have accessed your name, date of birth, and student identification number. **The incident did not impact Social Security numbers, payment card data, or financial account information.**

Upon learning of the incident, we reviewed our internal records to identify who may have been affected. We also worked with Blackbaud to obtain additional information about the nature of the event to determine the risk to your personal information. **We are not aware of any instances of fraud or identity theft arising out of the incident, and Blackbaud has assured us that any sensitive information that could lead to a risk of identity theft was encrypted and therefore inaccessible to the bad actor.** Nonetheless, out of an abundance of caution, we wanted to provide you notice of the incident.

Although we feel the incident does not create a danger of identity theft or fraud, we want to make sure you can receive more information about these issues. The FTC may be reached at www.ftc.gov/idtheft or by calling 1-877-ID-THEFT (1-877-438-4338). You may also mail the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580. You can also contact the national credit reporting agencies at:

Equifax
1-866-349-5191
www.equifax.com
P.O. Box 740241
Atlanta, GA 30374

Experian
1-888-397-3742
www.experian.com
P.O. Box 2002
Allen, TX 75013

TransUnion
1-800-888-4213
www.transunion.com
P.O. Box 2000
Chester, PA 19016

We value the trust you place in us and take our responsibility to safeguard your personal information seriously. We apologize for any inconvenience or concern this incident might cause. We are committed to taking steps to help prevent this from happening again, including reviewing our relationship with Blackbaud and the technical controls they have in place for securing our data. Should you have any further questions or concerns regarding this matter, please do not hesitate to contact us at blackbaudquestions@pointloma.edu or 619-849-2288 from 8:30 a.m. to 4:30 p.m. Pacific Time, Monday through Friday. For more detailed information regarding PLNU’s response along with FAQs about the incident, please visit our website at <https://blackbaudfaq.pointloma.edu/>.

Sincerely,

Kelly Smith
Vice President for University Advancement