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September 29, 2023

VIA EMAIL

Consumer Protection Division
Security Breach Notifications
Office of the Attorney General of Iowa
1305 E. Walnut Street
Des Moines, IA 50319
Email: consumer@ag.iowa.gov

Dear Sir or Madam:

On behalf of Grinnell College (“Grinnell” or the “College”), which is located at 1115 8th Ave, Grinnell, IA 50112, and pursuant to Iowa Code Chapter 715C, this letter provides notice of a recent data security incident. By providing this notice, Grinnell does not waive any rights or defenses regarding the applicability of Iowa law or personal jurisdiction.

On May 7, 2023, Grinnell became aware that a limited number of payroll files containing personal data (the “Payroll Files”) had been inadvertently saved in a folder that could be accessed by authenticated users within the Grinnell network. This inadvertently made the Payroll Files accessible to users without authorization to access the files. The Payroll Files contained names, addresses, social security numbers, salary information, and tax information.

Upon discovery of the incident, Grinnell immediately began an investigation, restricted access to the Payroll Files, and confirmed that the situation was remediated on the same day. The investigation found that a Grinnell employee inadvertently moved the Payroll Files to a pre-existing shared folder that was accessible to users with Grinnell credentials on March 13, 2023. The Payroll Files were accessed by a limited number of College users between May 4, 2023 and May 7, 2023. Access to the files was removed on May 7, 2023. There is currently no evidence that any information related to the Payroll Files has been misused or acquired without authorization. Likewise, there is no evidence that any individual outside the Grinnell College community has accessed the files.

Nonetheless, Grinnell is providing written notification to the 1,096 Iowa residents whose information was included in the Payroll Files, which includes an offer for twelve (12) months of cost-free credit monitoring. This notification is being sent to the impacted residents via regular mail today, September 29, 2023. A sample copy of that individual notice is attached for your review.

Office of the Attorney General of Iowa

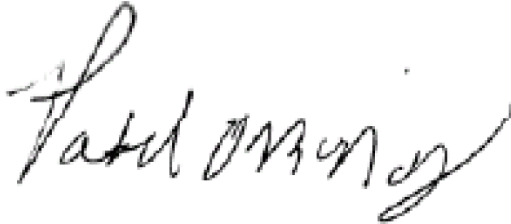
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Please feel free to contact me with any questions at (716) 898-2102 or pmcnally@octillolaw.com.

Sincerely,

OCTILLO

A handwritten signature in black ink, appearing to read "Patrick D. McNally". The signature is written in a cursive style with a large initial "P" and "M".

Patrick D. McNally, Esq.

Certified Information Privacy Professional, United States (CIPP/US)

Encl.



1115 8th Avenue
Grinnell, IA 50112

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

<<Date>>

Dear <<Name 1>>,

The College takes privacy very seriously. It is important to us that you are made fully aware of a recent unintentional disclosure.

Grinnell College recently discovered that a small number of files that contained payroll information were inadvertently made accessible to college members with a Grinnell College username and password. Our subsequent detailed investigation determined that some of your personal information was included in the payroll information.

This letter provides you with information about this incident and, although we are unaware of any misuse of your information, steps you can take to protect your information.

What Happened?

On May 7, 2023, Grinnell College became aware that a limited number of files containing Grinnell College payroll data (the “Payroll Files”) had been saved in a shared folder that could be accessed by users within the Grinnell network. This inadvertently made the Payroll Files accessible within our internal network to college users, including those who would not have had authorization to access the files.

Immediately upon identifying this situation, the College initiated protocols designed to protect the data, identified what these files may have contained, and performed forensic examinations to identify potential exposure. The situation was remediated on the same day, and we engaged a leading data security and privacy firm to assist our investigation and response. In addition, we conducted a thorough analysis of available logs to understand how the incident occurred. The investigation found that, on March 13, 2023, a Grinnell College employee inadvertently moved the Payroll Files to a shared folder that was accessible to anyone with Grinnell credentials. The Payroll Files were accessed by a limited number of college users between May 4, 2023 and May 7, 2023.

There is currently no evidence that any information within the Payroll Files has been misused or copied without authorization. Likewise, there is no evidence that any individual external to Grinnell College has accessed the files. Nonetheless, Grinnell takes information privacy seriously and is providing this notice so that you are aware of this incident.

What Information Was Involved?

We have determined that the Payroll Files included names, addresses, social security numbers, salary information, and tax information.

What We Are Doing.

Since discovering that the Payroll Files were accessible inside the Grinnell network, the College has provided additional training to employees on file sharing permissions and protocols. We are also investigating additional technical safeguards to improve the security of our information systems. We are continuing to work with leading data security and privacy professionals to assist our investigation and response and are reporting this incident to the relevant authorities.

While there is currently no evidence that any information has been misused, we are also offering a complimentary <<CM Duration>>-month membership in Experian IdentityWorks as an additional option to help protect your information. This product will provide you with industry-leading identity detection and identity theft resolution. To activate your membership and start monitoring your personal information, please follow the steps below, using the unique code assigned to you:

- You must enroll by <<Enrollment Deadline>> **before 5:59 PM CT** (Your code will not work after this date/time.)
- Visit the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your activation code: <<Activation Code>>

If you have questions about the product, need assistance with identity restoration, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-288-8057 by 5:59 PM CT on <<Enrollment Deadline>>. If you do call Experian, please be prepared to provide engagement number <<Engagement Number>> as proof of eligibility for the identity restoration services by Experian.

What You Can Do.

It is always recommended that you regularly monitor credit reports and review account statements, and that you report any suspicious activity to your financial institutions. Please also review the "Additional Resources" section included with this letter, which outlines other resources you can use to protect your personal information.

For More Information.

If you have any questions, please call us at 855-457-5064, Monday through Friday, from 8:00 a.m. to 8:00 p.m. Central Standard Time (excluding some U.S. national holidays).

Sincerely,



Dave Robinson
Chief Information Officer, Grinnell College

ADDITIONAL RESOURCES

Contact information for the three nationwide credit reporting agencies:

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111

Experian, PO Box 2104, Allen, TX 75013, www.experian.com, 1-888-397-3742

TransUnion, PO Box 2000, Chester, PA 19022, www.transunion.com, 1-800-888-4213

Free Credit Report. It is recommended that you remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring your credit report for unauthorized activity. You may obtain a copy of your credit report, free of charge, once every twelve (12) months from each of the three nationwide credit reporting agencies.

To order your annual free credit report please visit www.annualcreditreport.com or call toll free at **1-877-322-8228**.

You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's ("FTC") website at www.consumer.ftc.gov) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents: You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

Fraud Alert. You may place a fraud alert in your file by calling one of the three nationwide credit reporting agencies above. A fraud alert tells creditors to follow certain procedures, including contacting you before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit.

Security Freeze. You may obtain a security freeze on your credit report, free of charge, to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may also submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report, free of charge, or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

The security freeze will prohibit a consumer reporting agency from releasing any information in your credit report without your express authorization or approval. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. When you place a security freeze on your credit report, you will be provided with a personal identification number, password, or similar device to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report to a specific party or parties or for a specific period of time after the freeze is in place.

To place a security freeze on your credit report, you may be able to use an online process, an automated telephone line, or a written request to any of the three credit reporting agencies listed above. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for them as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, and display your name, current mailing address, and the date of issue.

For New Mexico Residents: You may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

Federal Trade Commission and State Attorneys General Offices. If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your home state. You may also contact these agencies for information on how to prevent or avoid identity theft.

You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, www.ftc.gov/bcp/edu/microsites/idtheft/, 1-877-IDTHEFT (438-4338).

For Alabama Residents: You may contact the Attorney General's Office for the State of Alabama, Consumer Protection Division, 501 Washington Avenue, Montgomery, AL 36104, www.oag.state.md.us, 1-800-392-5658.

For District of Columbia Residents: You may contact the District of Columbia Office of the Attorney General, 400 6th Street NW, Washington, D.C. 20001, consumer.protection@dc.gov, (202) 442-9828.

For Illinois Residents: You may contact the Illinois Office of the Attorney General, 100 West Randolph Street, Chicago, IL 60601, https://illinoisattorneygeneral.gov/about/email_ag.jsp, 1-800-964-3013.

For Iowa Residents: You may contact the Iowa Office of the Attorney General, 1305 E. Walnut Street, Des Moines IA 50319, consumer@ag.iowa.gov, 1-888-777-4590.

For Kansas Residents: You may contact the Kansas Office of the Attorney General, Consumer Protection Division, 120 SW 10th Ave, 2nd Floor, Topeka, KS 66612-1597, <https://ag.ks.gov/>, 1-800-432-2310.

For Kentucky Residents: You may contact the Kentucky Office of the Attorney General, Consumer Protection Division, 1024 Capital Center Drive, Suite 200, Frankfort, Kentucky 40601, www.ag.ky.gov, 1-800-804-7556.

For Maryland Residents: You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us, 1-888-743-0023.

For Minnesota Residents: You may contact the Minnesota Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us, 1-888-743-0023.

For Missouri Residents: You may contact the Missouri Office of the Attorney General, Consumer Protection, 207 W. High St., P.O. Box 899, Jefferson City, MO 65102, www.ago.mo.gov, 1-800-392-8222.

For New Mexico Residents: You may contact the New Mexico Office of the Attorney General, Consumer Protection Division, 408 Galisteo Street, Villagra Building, Santa Fe, NM 87501, www.nmag.gov, 1-844-255-9210.

For New York Residents: You may contact the New York Office of the Attorney General, Office of the Attorney General, The Capitol, Albany, NY 12224-0341, <https://ag.ny.gov>, 1-800-771-7755.

For North Carolina Residents: You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Main Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov, 1-877-566-7266.

For Rhode Island Residents: You may contact the Rhode Island Office of the Attorney General, Consumer Protection Division, 150 South Main Street, Providence, RI 02903, www.riag.ri.gov, 1-401-274-4400.

For Texas Residents: You may contact the Texas Office of the Attorney General, Office of the Attorney General, PO Box 12548, Austin, TX 78711-2548, www.texasattorneygeneral.gov, 1-800-621-0508.

Reporting of identity theft and obtaining a police report. You have the right to obtain any police report filed in the United States in regard to this incident. If you are the victim of fraud or identity theft, you also have the right to file a police report.

For Iowa Residents: You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

For Massachusetts Residents: You have the right to obtain a police report if you are a victim of identity theft.

For North Carolina Residents: You are advised to report any suspected identity theft to law enforcement or to the North Carolina Attorney General.

For Oregon Residents: You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.

For Rhode Island Residents: Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident.