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Fax

To: CPB **From:** Carrie Hubbell, Paralegal

Fax: 518-474-2474 **Pages:** 4 (including cover page)

Phone: **Date:** March 2, 2007

Re: Security Breach Notification **cc:**

- Urgent For Review Please Comment Please Reply Please Recycle

• **Comments:**

Please see the attached. Kindly advise if I can be of further assistance. Thank you.

Reporting Form
For Business, Individual or NY State Entity reporting a
"Breach of the Security of the System"
Pursuant to the Information Security Breach
and Notification Act (General Business Law §889-aa;
State Technology Law §208)

Name of Business, Individual or State Entity Goal Financial, Inc.
Date of Discovery of Breach: Mid-December 2006
Estimated Number of Affected Individuals: 526 New York Residents
Date of Notification to Affected Individuals: The week of February 20, 2007
Manner of Notification: written notice
 electronic notice (email)
 telephone notice

Are you requesting substitute notice? Yes No (If yes, attach justification)

Content of Notification to Affected Individuals: Describe what happened in general terms and what kind of information was involved. Please attach copy of Notice.

Goal Financial learned in mid-December that two of its employees, while employed at Goal, accessed the company's databases to retrieve customer information for use in a competing business. The two employees are no longer with the company. Over the last several weeks, Goal has conducted internal and external investigations to identify which customers' personal information was taken by these employees. Based on the information analyzed to date, the company has determined that some consumers' personally identifiable information (specifically, some or all of the following: full or partial Social Security number, driver's license number, date of birth, address, and/ or phone number) was accessed by these employees while they worked at Goal. While the company does not know whether the consumers' personally identifiable information was used by these employees, that is a potential risk.

Goal Financial has drafted written notice of the breach that it will be sending to consumers imminently via first-class mail. See Attached Sample Notice. As you can see, the notice explains the occurrence, provides consumers with a telephone number to reach Goal Financial if they have questions about the occurrence, and provides information on how they can obtain free credit reports to monitor any unusual activity on their credit reports.

Name of Business or Individual Contact Person: Alan Komensky, Esq.
Title: General Counsel
Telephone number: (858) 200-3776
Email: akomensky@goalfinancial.net
Dated: March 2, 2007
Submitted by: Carrie Hubbell
Title: Paralegal

Address: 9477 Waples Street, Suite 100, San Diego, CA 92121
Email: chubbell@goalfinancial.net
Telephone: (858) 320-6792 Fax: (858) 320-6792

**GOAL FINANCIAL**www.goalfinancial.net9477 Waples Street, Suite 100
San Diego, CA 92121
800.869.1538 fax: 858.452.6648

February 26, 2007

Dear Customer:

Goal Financial takes great pride in our customer service, core values, and success in helping families to gain access to education. As we have grown over the past 5 years, we have worked hard to ensure that all of our customers have had a "best in class" customer experience. Like other companies, we face potential information security risks and we work hard to minimize such risks.

Goal Financial learned in mid-December that two of its employees, while employed at Goal, accessed the company's databases to retrieve customer information for use in a competing business. The two employees are no longer with the company. Over the last several weeks, Goal has conducted internal and external investigations to identify which customers' personal information was taken by these employees. Based on the information analyzed to date, we have determined that some of your personally identifiable information (specifically, some or all of the following: full or partial Social Security number, driver's license number, date of birth, address, and/or phone number) may have been accessed by these employees while they worked at Goal. While we do not know whether your personally identifiable information was used by these employees, there is a potential risk that it was removed from Goal's premises and used in an unauthorized manner.

If you have questions concerning this matter – or if you have received any mail, telephone calls, or any other form of solicitation from former Goal employees – please call us at this toll-free number: 866-355-3043. The information you provide to us will help us determine whether your personally identifiable information has been used in an unauthorized manner by these employees.

We apologize for this occurrence. We assure you that we have and are taking steps to prevent future employee theft. We encourage you to ask for a free copy of your credit report from each of the three credit reporting companies – Equifax, Experian, and TransUnion. To obtain your free credit report you can go to www.annualcreditreport.com; or you can call the toll-free number 877-322-8228; or you can complete the Annual Credit Report Request Form (available at www.ftc.gov/bcp/online/include/request/form/final.pdf) and mail it to: Annual Credit Report Request Service; P.O. Box 105281; Atlanta, GA 30348-5281.

Under the Fair and Accurate Credit Transactions Act, each of these credit reporting companies must provide you with a free credit report once every 12 months upon your request. To keep an eye on the accuracy and completeness of the information in your reports, we recommend that you stagger your requests from each of the reporting companies over the next 12 months.

When you receive your credit report, look it over carefully. Look for accounts you did not open and/or inquiries from creditors that you did not initiate. If you see anything you do not understand, call the credit agency at the telephone number provided on the report. Goal is committed to protecting the security of your information.

Sincerely,

Michael Cox
Vice President, Enterprise Risk Management