

150 N. Riverside Plaza, Suite 3000, Chicago, IL 60606 • (312) 819-1900

November 8, 2021

Bruce A. Radke 312-463-6211 312-819-1910 Direct Fax bradke@polsinelli.com

VIA E-MAIL (ATTORNEYGENERAL@DOJ.NH.GOV)

The Honorable Gordon MacDonald Attorney General of the State of New Hampshire Office of the Attorney General 33 Capitol Street Concord, New Hampshire 03301

Re: Notification of a Potential Data Security Incident

Dear Attorney General MacDonald:

We represent CopperPoint Insurance Company, Pacific Compensation Insurance Company, and Alaska National Insurance Company (collectively, "CopperPoint"), which has an address at 3030 North Third Street, Phoenix, AZ 85012, in connection with an incident that involved the personal information of one (1) resident of New Hampshire. CopperPoint is reporting the incident pursuant to N.H. REV. STAT. ANN. § 359-C:20. This notice will be supplemented, if necessary, with any new significant facts discovered subsequent to this submission. While CopperPoint is notifying you of this incident, CopperPoint does not waive any rights or defenses relating to the incident, this notice, or the applicability of New Hampshire law on personal jurisdiction.

NATURE OF THE SECURITY BREACH OR UNAUTHORIZED USE OR ACCESS

CopperPoint has learned that an unauthorized third party gained access to some of its employees' email accounts. Upon learning of the incident, CopperPoint promptly secured the email accounts to prevent any further unauthorized access. CopperPoint also engaged a forensic security firm to investigate the incident and confirm the security of its email and computer systems. That investigation involved reviewing the contents of the email accounts and, on July 22, 2021, determined that the accounts contained the name, date of birth, Social Security number, student identification number, and medical information of one (1) resident of New Hampshire.

To date, CopperPoint is not aware of any fraud or identity theft to any individual as a result of this incident, and the incident was limited to CopperPoint's email environment. Nevertheless, out of an abundance of caution, CopperPoint is providing notice to you and the involved individual.

Polsinelli PC, Polsinelli LLP in California



November 8, 2021 Page 2

NUMBER NEW HAMPSHIRE RESIDENTS AFFECTED

Upon determining that personal customer information may have been accessible as a result of the incident, CopperPoint promptly began the effort of identifying addresses for involved individuals in order to notify them as soon as possible. In total, the incident may have involved one (1) New Hampshire resident. CopperPoint notified the involved individual via written notification on November 5, 2021. This notice included a contact number the individual can call should they have questions or require assistance. CopperPoint is also providing the individual with an offer of a complimentary one-year membership of Experian IdentityWorks Credit 3B. A copy of the notice that was sent to the involved individuals is enclosed.

STEPS TAKEN RELATING TO THE INCIDENT

Upon learning of the incident, CopperPoint promptly contained the incident by securing the email account to prevent further access. It also engaged a forensic firm to investigate and confirm the security of its email and computer systems. CopperPoint has also taken steps to reduce the risk of a similar incident occurring in the future, including assessing the implementation of additional technical safeguards. Finally, as discussed above, CopperPoint is notifying the involved individual, providing complimentary credit monitoring services, and advising them on how they can protect themselves against fraudulent activity and identity theft.

CONTACT INFORMATION

Please do not hesitate to contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,

Bue C. Redke

Bruce A. Radke

Enclosure





<<Date>> (Format: Month Day, Year)

```
<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>
```

RE: NOTICE OF DATA BREACH

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

What Happened? CopperPoint Insurance Companies¹ values and respects the privacy and the confidentiality of your information. Unfortunately, we are writing to advise you of a recent incident that may have impacted some of your personal information. We are not aware of any instances of fraud or identity theft that have occurred as a result of this incident. We are also writing to you to provide guidance on what you can do to protect yourself, if you feel it is appropriate to do so.

On January 11, 2021, we learned that an unauthorized party gained access to some of our employees' email accounts. Upon learning of the incident, we promptly secured the email account to prevent any further unauthorized access. We also engaged a forensic security firm to investigate the incident and confirm the security of our email and computer systems. That investigation involved reviewing the contents of the email account and, on July 22, 2021, we determined that the account contained some of your personal information.

What Information Was Involved? The impacted information varies by individual, but may have included your <<bb/>b2b_text_1(Name, Data Elements)>><<bb/>b2b_text_2(Data Elements cont'd)>>.

What We Are Doing. Although we are not aware of any instances of fraud or identity theft, we are offering a complimentary one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.

What You Can Do. You can find more information on steps to protect yourself against identity theft or fraud, including the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft, in the enclosed *Additional Important Information* sheet. We also encourage you to activate the credit monitoring services we are providing to you.

¹CopperPoint Insurance Company; CopperPoint American Insurance Company; CopperPoint Casualty Insurance Company; CopperPoint General Insurance Company; CopperPoint Indemnity Insurance Company; CopperPoint National Insurance Company; CopperPoint Premier Insurance Company; CopperPoint Western Insurance Company; MountainPoint Insurance Company; Pacific Compensation Insurance Company; Alaska National Insurance Company.

For More Information. We take our responsibility to safeguard personal information seriously and we apologize for any inconvenience this incident may cause you. For further information and assistance, please call us directly at 1-???-???? from 8:00 am to 5:30 pm Central Time, Monday through Friday, excluding major U.S. holidays.

Sincerely,

Marc Schmittlein President & CEO

Maux Extratto

To help protect your identity, we are offering a **complimentary** one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

- 1. ENROLL by: <<b2b_text_3(Enrollment Deadline)>> (Your code will not work after this date.)
- 2. VISIT the Experian IdentityWorks website to enroll: https://www.experianidworks.com/3bcredit
- 3. PROVIDE the Activation Code: <<Activation Code s_n>>

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. Be prepared to provide engagement number <
b2b_text_4(Engagement Number)>> as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- Experian credit report at signup: See what information is associated with your credit file. Daily credit reports are available for online members only.*
- Credit Monitoring: Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- Identity Restoration: Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- Experian IdentityWorks ExtendCARE™: You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- Up to \$1 Million Identity Theft Insurance**: Provides coverage for certain costs and unauthorized electronic fund transfers.

Activate your membership today at https://www.experianidworks.com/3bcredit or call 877-288-8057 to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8057.

^{*} Offline members will be eligible to call for additional reports quarterly after enrolling.

^{**} The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

ADDITIONAL IMPORTANT INFORMATION

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your account statements and monitoring 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.

Other Important Information: You should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft. For more information and to contact the FTC, please visit www.ftc.gov/idtheft or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

<u>Credit Reports</u>: You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting www.annualcreditreport.com, by calling toll-free 1-877-322-8228, 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 a copy of the request form at https://www.annualcreditreport.com/manualRequestForm.action.

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries is as follows:

 Equifax
 Experian
 TransUnion

 1-866-349-5191
 1-888-397-3742
 1-800-888-4213

 www.equifax.com
 www.experian.com
 www.transunion.com

 P.O. Box 740241
 P.O. Box 2002
 P.O. Box 2000

 Atlanta, GA 30374
 Allen, TX 75013
 Chester, PA 19016

Fraud Alerts: You may want to consider placing a fraud alert on your credit report. A fraud alert is free and will stay on your credit report for one (1) year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at www.annualcreditreport.com.

Credit and Security Freezes: You may have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:

 Equifax Security Freeze
 Experian Security Freeze
 TransUnion Security Freeze

 1-888-298-0045
 1-888-397-3742
 1-888-909-8872

 www.equifax.com
 www.experian.com
 www.transunion.com

 P.O. Box 105788
 P.O. Box 9554
 P.O. Box 160

 Atlanta, GA 30348
 Allen, TX 75013
 Woodlyn, PA 19094

Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting https://files.consumerfinance.gov/f/documents/bcfp_consumer-rights-summary_2018-09.pdf, or by requesting information in writing from the Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

This notice was not delayed by a law enforcement investigation.

Individuals interacting with credit reporting agencies have rights under the Fair Credit Reporting Act. We encourage you to review your rights under the Fair Credit Reporting Act by visiting https://files.consumerfinance.gov/f/documents/bcfp_consumer-rights-summary_2018-09.pdf, or by requesting information in writing from the Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

<u>lowa Residents</u>: lowa residents can contact the Office of the Attorney general to obtain information about steps to take to avoid identity theft from the lowa Attorney General's office at: Office of the Attorney General of lowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines IA 50319, 515-281-5164.

New York State Residents: New York residents can obtain information about preventing identity theft from the New York Attorney General's Office at: Office of the Attorney General for the State of New York, Bureau of Consumer Frauds & Protection, The Capitol, Albany, New York 12224-0341; https://ag.ny.gov/consumer-frauds/identity-theft; (800) 771-7755.

North Carolina Residents: North Carolina residents can obtain information about preventing identity theft from the North Carolina Attorney General's Office at: North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001; 877-5-NO-SCAM (Toll-free within North Carolina); 919-716-6000; www.ncdoi.gov.