



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

RECEIVED

APR 25 2023

CONSUMER PROTECTION

426 W. Lancaster Avenue, Suite 200  
Devon, PA 19333

April 21, 2023

**VIA U.S. MAIL**

Consumer Protection Bureau  
Office of the New Hampshire Attorney General  
33 Capitol Street  
Concord, NH 03301

**Re: Supplemental Notice of Data Event**

To Whom It May Concern:

We continue to represent Elephant Insurance Services, LLC ("Elephant Insurance"), located at 9950 Mayland Drive, Henrico, VA 23233, and write to supplement our May 25, 2022 notification to your Office regarding an incident that may affect New Hampshire residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this supplemental notice, Elephant Insurance does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

As part of the extensive investigation into this incident, Elephant Insurance identified suspicious activity related to certain employee email accounts and, through further investigation, subsequently confirmed these email accounts were accessed by an unauthorized actor on separate occasions between September 2021 and March 2022. The investigation could not confirm whether any information was actually accessed or acquired within the relevant accounts. Therefore, Elephant Insurance undertook a comprehensive and time-intensive review of the relevant emails to determine what information was present and to whom it related. This review identified individuals whose information was in the relevant emails at the time of the incident. Elephant Insurance then promptly began a review of internal records in order to reconcile this information with available contact information so it could provide notice to those individuals.

Elephant previously began providing notice to individuals associated with the email activity. Based on ongoing efforts to identify contact information, on or about April 18, 2023, Elephant Insurance

Office of the New Hampshire Attorney General  
April 21, 2023  
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provided supplemental notice of this incident to one (1) New Hampshire resident. The potentially affected information related to the New Hampshire resident includes .  
Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit AA***. At this time, Elephant has completed its review for additional addresses.

Should you have any questions regarding this supplemental notification or other aspects of the data security event, please contact us at .

Very truly yours,

M. Alexandra Belton of  
MULLEN COUGHLIN LLC

MABB/rhb  
Enclosure

# **EXHIBIT AA**



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

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country>>

<<b2b\_text\_1 (Variable Header)>>

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>:

Elephant Insurance values and respects the privacy of your information which is why we are writing to let you know about an incident that may involve some of your information. This letter provides you with information about the incident, our response, and resources available to you.

**What Happened?** In April 2022, we identified unusual activity on our network. We promptly undertook a comprehensive investigation, working with third-party specialists, to secure our systems and to confirm the nature and scope of the incident, as well as any impact to information on our network. The investigation determined certain employee email accounts were accessed without authorization on separate occasions from September 2021 until March 2022.

**What Information Was Involved?** The investigation could not confirm whether any information was actually viewed or copied from the accounts; therefore, we undertook a comprehensive and time-intensive review of the relevant emails to determine what information was present and to whom it related. After receiving the initial results of the review, Elephant confirmed address information so we could notify potentially impacted individuals. You are receiving this letter because our review determined that your information was present in the relevant emails at the time of this incident. This information included your <<b2b\_text\_2 ("name" and Impacted Data)>>. While Elephant is not aware of any actual or attempted misuse of this information, we are providing this notice out of an abundance of caution.

**What We Are Doing.** Upon learning of this incident, we took measures to secure our systems and change relevant passwords, to investigate this incident, and to confirm the scope of activity so we could determine what information may be affected. We reported the incident to federal law enforcement and are notifying appropriate state regulatory agencies. As part of our ongoing commitment to information security, we are also reviewing and enhancing our existing safeguards and procedures.

As an added precaution, we are offering you access to 12 months of identity monitoring services at no cost to you. If you wish to activate these services, you may follow the instructions included in the attached **Steps You Can Take to Help Protect Information**.

**What You Can Do.** We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. You should promptly report any activity indicative of identity theft or fraud immediately to law enforcement. Please also review the information contained in the attached **Steps You Can Take to Help Protect Information**.

**For More Information.** We understand that you may have questions that are not addressed in this notice. If you have additional questions, please call our dedicated assistance line at (855) 788-2603, which is available from 9:00 AM to 6:30 PM EST Monday through Friday (excluding major U.S. holidays).

Sincerely,

Elephant Insurance Services, LLC  
www.elephant.com



## STEPS YOU CAN TAKE TO HELP PROTECT INFORMATION

### **Activate Identity Monitoring Services**

We have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people whose information may be affected by a data incident. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b\_text\_6 (Date)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s\_n>>

For more information about Kroll and your Identity Monitoring services, you can visit [info.krollmonitoring.com](http://info.krollmonitoring.com).



### **TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES**

You have been provided with access to the following services from Kroll:

#### **Single Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

#### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

#### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

### **Monitor Your Accounts**

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. 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 directly contact the three major credit reporting bureaus listed below to request a free copy of your credit report.

Consumers have the right to place an initial or extended "fraud alert" on a credit 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 three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a "credit freeze" on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer's express authorization. The credit 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 credit 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 credit freeze on your credit report. To request a security freeze, you will need to provide the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;

4. Addresses for the prior two to 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, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/help">https://www.experian.com/help</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
888-298-0045	1-888-397-3742	833-395-6938
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

#### **Additional Information**

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may 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); and 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. This notice has not been delayed by law enforcement.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and [www.oag.state.md.us](http://www.oag.state.md.us). Elephant Insurance is located at 9950 Mayland Drive, Suite 400, Henrico, VA 23233.