

## RECEIVED

CONSUMER PROTECTION

Tiana Demas T: +1 212 479 6560 tdemas@cooley.com

VIA CERTIFIED MAIL

February 10, 2022

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

To Whom It May Concern:

On behalf of Ethos Technologies Inc. ("Ethos"), a life insurance provider, I write to inform you of a recent incident involving unauthorized access to driver's license numbers (the "Incident").

On January 12, 2022, Ethos learned that unauthorized actors had launched a sophisticated attack against the company's online insurance application flow (the "Online Flow"). To do this, the unauthorized actors entered information they already had obtained from other sources—first and last name, address, date of birth, and driver's license state—into the Online Flow. Then they used specialized web tools to access the corresponding driver's license numbers (produced via a third-party integration) from the page source code of the Online Flow. Importantly, this information did not appear on the public-facing part of the website. While Ethos uses software and other methods designed to detect attacks against the Online Flow and the company's systems more generally, the unauthorized actors used techniques that appear to have been designed to avoid detection. The unauthorized activity spanned from approximately July 15, 2021 to January 12, 2022.

As soon as Ethos discovered the Incident, it launched an investigation, notified the FBI, and took action to prevent any further unauthorized access to driver's license numbers. The company has not detected any additional unauthorized activity since January 12.

Ethos will begin notifying approximately 20 New Hampshire residents of the Incident on February 11, 2022. All notified individuals will be offered two years of free credit monitoring and identity theft protection services through Experian, and these services can be activated until May 31, 2022.

Enclosed please find a sample notice letter to New Hampshire residents.

Should you have any questions, please contact me at tdemas@cooley.com or (212) 479-6560.

Sincerely.

Tiana Demas

Encl.

SAMPLE A. SAMPLE - L01
APT ABC
123 ANY ST
ANYTOWN, US 12345-6789

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Dear Sample A. Sample:

On behalf of Ethos Technologies Inc. ("Ethos"), we are writing to inform you of a recent security incident where unauthorized actors may have accessed your driver's license number. While we have no evidence to suggest that your driver's license number has been misused, we are notifying potentially affected individuals and are providing them the opportunity to enroll in free credit monitoring.

What Happened? Ethos offers life insurance policies through an online application process. On January 12, 2022, we learned that unauthorized actors had launched a sophisticated attack against our online insurance application flow to access certain persons' driver's license numbers. We immediately began an investigation and took prompt action to prevent any further unauthorized access to this information.

Based on our investigation, to obtain your driver's license number, the unauthorized actors needed to already have the following information about you, which they obtained from other sources: first and last name, date of birth, residential address, and driver's license state of issuance. They then entered this information into our online insurance application flow to exploit a feature that validates applicant driver's license numbers through a third-party service. Next, the unauthorized actors used specialized web tools to access driver's license numbers from the page source code of our website. Importantly, this information did not appear on the public-facing parts of our website. The unauthorized activity spanned from approximately July 15, 2021 through January 12, 2022.

What Information Was Involved? Your driver's license number.

What We Are Doing. We notified federal law enforcement and took prompt action to prevent any further unauthorized access to driver's license numbers. These measures included technical changes to our website's page source code. We also engaged an independent forensic investigation firm to assist our investigation of and response to this incident. These measures are in addition to those we have regularly maintained, which include penetration testing by internal and external security experts, annual cyber security audits, and threat prevention and detection software.

What You Can Do. We have arranged for you, at your option, to enroll in a free two-year credit monitoring and identity theft protection service. We have engaged Experian® to provide you with its IdentityWorks<sup>SM</sup> service, which includes credit monitoring, identity theft detection and resolution services, and up to \$1 million of identity theft insurance.¹ You must enroll by May 31, 2022 to activate this service by using the following activation code: ABCDEFGHI. This code is unique for your use and should not be shared. To enroll, visit https://www.experianidworks.com/credit or call (833) 671-0409. Please reference the following engagement number: B026792.

<sup>&</sup>lt;sup>1</sup> 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.

Other Important Information. We also are providing you the following information about steps consumers can take to protect against potential misuse of information.

We urge you to remain vigilant for incidents of potential fraud and identity theft, including by regularly reviewing your account statements and monitoring your credit reports. If you discover any suspicious or unusual activity on your accounts or suspect identity theft or fraud or anything you do not understand, please call your financial institution(s).

In addition, you may contact the Federal Trade Commission ("FTC") or law enforcement, including your state Attorney General, to report incidents of identity theft or to learn about steps you can take to protect yourself from identity theft. To learn more, contact the FTC by visiting <a href="https://www.ftc.gov/idtheft">www.ftc.gov/idtheft</a>, calling 877-438-4338, or writing to the FTC's Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. If you file a police report for identity theft, you should obtain a copy of such report as you may need to give copies of the report to others to remedy any fraudulent activity.

You may also periodically obtain a free copy of your credit report from each nationwide credit reporting agency ("CRA"). If you discover information on your credit report arising from a fraudulent transaction, you should request that the CRA delete that information from your credit report file. You are entitled to one free copy of your credit report every 12 months from each of the three CRAs. You may obtain a copy of your credit report by visiting www.annualcreditreport.com or by calling 1-877-322-8228. You may contact the CRAs at:

Equifax (www.equifax.com)

**General Contact:** 

P.O. Box 740241, Atlanta, GA 30374 800-685-1111

Fraud Alerts and Security Freezes:

P.O. Box 740256, Atlanta, GA 30374

Experian

(www.experian.com) **General Contact:** 

P.O. Box 2104, Allen, TX 75013

888-397-3742

Fraud Alerts and Security Freezes:

P.O. Box 9554, Allen, TX 75013

TransUnion

(www.transunion.com)

**General Contact, Fraud Alerts** and Security Freezes:

P.O. Box 2000, Chester, PA

19022

800-916-8800

You may obtain additional information from the FTC and the CRAs about fraud alerts and security freezes. You can add a fraud alert to your credit report file at no cost to help protect your credit information. A fraud alert can make it more difficult for someone to get credit in your name because it tells creditors to follow certain procedures to protect you, but it also may delay your ability to obtain credit. You may place a fraud alert in your file by calling just one of the three CRAs listed above. As soon as that CRA processes your fraud alert, it will notify the other two CRAs, which then must also place fraud alerts in your file.

You can also contact each of the CRAs at the numbers listed above to place a security freeze at no cost to restrict access to your credit report. You will need to supply your name, address, date of birth, Social Security number, and other personal information. After receiving your request, each CRA will send you a confirmation letter containing a unique PIN or password that you will need in order to lift or remove the freeze. You should keep the PIN or password in a safe place.

You also have other rights under the Fair Credit Reporting Act ("FCRA"). For further information about your rights under the FCRA, please visit: http://files.consumerfinance.gov/f/201410\_cfpb\_summary\_your-rightsunder-fcra.pdf.

For More Information. For more information about this incident, or if you have questions or concerns, you may contact a dedicated team at (833) 671-0409 between the hours of 8 a.m. to 10 p.m. Central time,

Monday through Friday (excluding major U.S. holidays), and from 10 a.m. to 7 p.m. Central time, on Saturday and Sunday.

<u>For District of Columbia Residents</u>: You may obtain information about avoiding identity theft from the District of Columbia Attorney General's Office: Office of the Attorney General, 400 6th Street, NW, Washington, DC 20001, 202-727-3400, https://oag.dc.gov/.

<u>For Maryland Residents</u>: You may also obtain information about preventing and avoiding identity theft from the Maryland Office of the Attorney General: Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us.

For Massachusetts Residents: You have the right to obtain a police report.

<u>For New York Residents</u>: You may also obtain information about preventing and avoiding identity theft from the New York Attorney General's Office: Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, https://ag.ny.gov/internet/privacy-and-identity-theft.

<u>For North Carolina Residents</u>: You may also obtain information about preventing and avoiding identity theft from North Carolina Attorney General's Office: North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, www.ncdoj.gov.

Sincerely,

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Vice President of Security