



MULLEN
COUGHLIN_{LLC}
ATTORNEYS AT LAW

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

February 2, 2024

VIA E-MAIL

Office of the New Hampshire Attorney General
Consumer Protection & Antitrust Bureau
33 Capitol Street
Concord, NH 03301
E-mail: DOJ-CPB@doj.nh.gov

Re: Supplemental Notice of Data Event

To Whom It May Concern:

As you know, we continue to represent Amwins Group, Inc. (“Amwins”) located at 4725 Piedmont Row Dr., Suite 600, Charlotte, NC 28210, and are writing to supplement our December 29, 2023 notice to your office. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Amwins 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.

Nature of the Data Event

Until December 23, 2023, Amwins engaged with Paycor, Inc. (“Paycor”) for human resources services. On November 30, 2023, Amwins was notified by Paycor that it had experienced a recent cybersecurity event. In the notification, Paycor explained it uses a secure file transfer tool from Progress Software Corporation, known MOVEit Transfer, to support certain services it provides customers, including Amwins and its subsidiaries. Upon the public disclosure of the MOVEit vulnerabilities in May and June 2023, Paycor conducted an investigation into the MOVEit event and from its investigation, Paycor determined what information resided on the at-risk servers at the time of the event. Upon conclusion of its investigation, Paycor subsequently notified Amwins that some of its and its subsidiaries’ data on the affected servers may be at risk as a result of the MOVEit event.

Upon receiving the Paycor notification, Amwins conducted an internal review to understand the information provided by Paycor, including a list of affected Amwins individuals to determine

which Amwins subsidiaries employed the affected individuals and identify missing address information. As this process was ongoing, Amwins began notifying affected individuals as noted below. Amwin's efforts to locate missing mailing addresses for individuals identified by Paycor recently concluded. No unauthorized access to Amwins' or its subsidiaries' network occurred as a result of this event.

The information that could have been subject to unauthorized access includes

Notice to New Hampshire Residents

Amwins began providing written notice of this incident to affected individual on December 29, 2023. On or about February 2, 2024, Amwins notified an additional four (4) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon receiving notice of this third-party event, Amwins moved quickly to review the information provided by Paycor to understand the contents of that data, to whom that data relates, and which Amwins subsidiaries employed the potentially affected individuals. As part of Amwins' ongoing commitment to the security of information, Amwins regularly reviews and enhances its existing policies and procedures related to data privacy, including those relevant to the use of third-party vendors, to reduce the likelihood of a similar future event. Although Amwins is currently unaware of any actual or attempted misuse of the affected information as a result of this event, Amwins is providing access to credit monitoring services for _____, through Experian, to individuals whose personal information was potentially affected by this event, at no cost to individuals.

Additionally, Amwins is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to review account statements and to monitor credit reports for suspicious activity. Amwins is also providing individuals with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Office of the New Hampshire Attorney General

February 2, 2024

Page 3

Contact Information

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

Very truly yours,

Ryan C. Loughlin of
MULLEN COUGHLIN LLC

RCL/dle
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 999
Suwanee, GA 30024

2 1 458 *****SNGLP

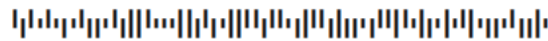
SAMPLE A. SAMPLE - L01

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



February 2, 2024

Notice of Data [Extra4]

Dear Sample A. Sample:

Amwins Group, Inc. (“Amwins”) writes to inform you of a data security event occurring at our human resources vendor, Paycor, Inc. (“Paycor”), and its managed file transfer service provider, Progress MOVEit (“MOVEit”), that involves some of your personal information. Amwins has engaged with Paycor to provide payroll services for the employees in Amwins’ U.S. operating subsidiaries. This letter provides details of the event, our response, and resources available to you to help protect your personal information from possible misuse, should you feel it is appropriate to do so.

What Happened. On November 30, 2023, Amwins received notification from Paycor that it had experienced a recent cybersecurity event. In its notification, Paycor explained that it uses a secure file transfer tool, known as MOVEit Transfer, to support certain services it provides customers, including Amwins and its subsidiaries. By way of brief background, in May 2023 and June 2023, Progress Software Corporation, the maker of the secure file transfer tool, disclosed publicly previously unknown vulnerabilities impacting the tool, but unfortunately not before an unauthorized actor used them to gain access to MOVEit Transfer servers Paycor utilizes. We understand that Paycor investigated the event and determined what information resided on the server at the time of the event, and upon conclusion of its investigation, Paycor subsequently notified us that some of our and our subsidiaries’ data on the affected servers may be at risk. Upon receiving the Paycor notification, we conducted an internal review of the provided list of affected Amwins individuals from Paycor to determine which Amwins subsidiaries employed the affected individuals. We recently completed our investigation and review and determined that your personal information was identified by Paycor as being on the MOVEit Transfer server at the time of the event. No unauthorized access to Amwins’ or its subsidiaries’ network occurred as a result of this event.

What Information Was Involved. Paycor’s investigation determined that this event rendered accessible your name, [Extra1]. Although we are currently unaware of any actual or attempted misuse of your personal information as a result of this event, we are providing you with this notice out of an abundance of caution.

What We Are Doing. We take this event and the security of personal information in our care very seriously. Upon learning of this event, we moved quickly to investigate and respond to the event and notify potentially affected individuals through this correspondence. As part of our ongoing commitment to the security of information, we regularly review and enhance our existing policies and procedures related to data privacy, including those relevant to the use of third-party vendors, to reduce the likelihood of a similar future event.

As an added precaution, we are providing you with access to [Extra3] months of credit monitoring and identity protection services provided by Experian. A description of services and instructions on how to enroll can be found within the enclosed *Steps You Can Take to Help Protect Your Information*. Please note that you must complete the enrollment process yourself, as we are not permitted to enroll you in these services on your behalf.

What You Can Do. Please review the enclosed *Steps You Can Take to Help Protect Your Information*, which contains information on what you can do to better protect against possible misuse of your information. We encourage you to remain vigilant against potential incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. You will also find information on how to enroll in the credit monitoring services offered.

For More Information. We understand that you may have questions that are not addressed in this letter. If you have additional questions, please call 866-579-2213, which is available Monday through Friday, between the hours of 8 am to 8 pm Central Time. Also, you can write to us at Amwins Group, Inc., 4725 Piedmont Row Dr., Suite 600, Charlotte, NC 28210.

Sincerely,

Amwins Group, Inc.

Steps You Can Take to Help Protect Your Information

Enroll in Complimentary Credit Monitoring Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for [Extra3] months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for [Extra3] months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary [Extra3]-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at [Phone Number]. Be prepared to provide engagement number [Engagement Number] as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR [Extra3]-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. 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 file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* 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.

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 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 one-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 credit 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 fraud alert or a credit freeze, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-800-916-8800
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; 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 District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 1-202-442-9828; and oag.dc.gov.

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 <https://www.marylandattorneygeneral.gov/>.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active-duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; 1-401-274-4400; and www.riag.ri.gov. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 260 Rhode Island residents impacted by this event.

