

RECEIVED

DEC 20 2021

CONSUMER PROTECTION



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

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426 W. Lancaster Avenue, Suite 200  
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December 14, 2021

**VIA U.S. MAIL**

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

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent Arthur Hall Insurance, located at 101 E Chestnut Street, West Chester, PA 19380, and are writing to notify your Office of an incident that may affect the security of some personal information relating to approximately one (1) New Hampshire resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Arthur Hall 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.

**Nature of the Data Event**

On or about February 22, 2021, Arthur Hall Insurance discovered suspicious activity related to an Arthur Hall Insurance employee email account. Arthur Hall Insurance immediately took steps to secure the account and launched an investigation which included working with a third-party forensic investigator to determine the nature and scope of the activity. The investigation determined that email accounts belonging to certain Arthur Hall Insurance employees were subject to unauthorized access on separate occasions between January 26, 2021 and February 22, 2021. While the investigation confirmed the accounts were subject to unauthorized access, it was unable to identify all emails or attachments within the accounts that the unauthorized individual may have accessed or acquired. Therefore, out of an abundance of caution, Arthur Hall Insurance, with the assistance of third-party forensic investigators, conducted a programmatic and manual review of the entire contents of the email accounts for emails or attachments that contain protected information present at the time of this activity and to which individuals the information relates.

Once complete, Arthur Hall Insurance immediately began an extensive review of its internal files in order to determine which clients the information belonged and address information in order to provide them with notice of the event. On or about October 3, 2021, Arthur Hall Insurance's review identified that certain client information and information related to individuals with whom Arthur Hall Insurance had a direct relationship with was impacted. While the information varies for each individual, the information that could have been subject to unauthorized access includes name, address, Driver's license number.

#### **Notice to New Hampshire Resident**

On or about December 14, 2021, Arthur Hall Insurance began providing written notice of this incident to affected individuals, which includes one (1) New Hampshire resident. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*. Notification to impacted clients and individuals is ongoing, and Arthur Hall Insurance may supplement this notification if it is determined that a significant amount of additional New Hampshire residents will receive notice.

#### **Other Steps Taken and To Be Taken**

Upon discovering the event, Arthur Hall Insurance moved quickly to investigate and respond to the incident, assess the security of Arthur Hall Insurance systems, and notify potentially affected individuals. Arthur Hall Insurance is also working to implement additional safeguards and training to its employees.

Arthur Hall Insurance is also providing complimentary access to credit monitoring services for one (1) year, through Kroll, to individuals whose information was potentially affected by this incident. Additionally, Arthur Hall Insurance is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including 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

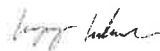
December 14, 2021

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**Contact Information**

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4637.

Very truly yours,



Gregory Lederman of  
MULLEN COUGHLIN LLC

GCL/ams  
Enclosure

# EXHIBIT A



Advisor.  
Advocate.  
Agent.

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

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

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

Arthur Hall Insurance is writing to inform you of a recent event that may impact the security of some of your information. While we are unaware of any actual or attempted misuse of your information, we are providing you with information about the incident, our response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

**What Happened?** Arthur Hall Insurance discovered suspicious activity related to an Arthur Hall Insurance employee email account. We immediately took steps to secure the account and launched an investigation which included working with a third-party forensic investigator to determine the nature and scope of the activity. The investigation determined that email accounts belonging to certain Arthur Hall Insurance employees were subject to unauthorized access on separate occasions between January 26, 2021 and February 22, 2021. As a result, the unauthorized actor may have had access to certain emails and attachments within these accounts.

**What Information Was Involved?** The investigation was unable to identify all emails or attachments in the accounts that the unauthorized individual may have accessed or acquired. Therefore, out of an abundance of caution, we conducted a review of the entire contents of the email accounts for emails or attachments that contained personal information. This review was recently completed and we are notifying you of this incident because the investigation confirmed that your information was present at the time the incident. The impacted information that is related to you includes your <<b2b\_text\_1(name, data elements)>>. To date, Arthur Hall Insurance has not received any reports of actual or attempted misuse of your information.

**What We Are Doing.** The confidentiality, privacy, and security of information in our care is one of our highest priorities and we take this incident very seriously. When we discovered this incident, we immediately reset the impacted email account password and took steps to determine what information was in the accounts and to which Arthur Hall Insurance clients the information belonged. We also confirmed the security of our employee email accounts and related systems. As part of our ongoing commitment to the security of information in our care, we are working to review our existing policies and procedures, to implement additional safeguards, and to provide additional training to our employees on data privacy and security. We will also be notifying state and federal regulators, as required.

As an added precaution, we are offering you complimentary access to 12 months of Credit Monitoring, Fraud Consultation, and Identity Theft Restoration services through Kroll. We encourage you to activate these services, as we are not able to act on your behalf to activate you. Please review the instructions contained in the attached *Steps You Can Take to Help Protect Your Information* for additional information on these services.

**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. Please also review the information contained in the enclosed *Steps You Can Take to Help Protect Your Information*.

**For More Information.** We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call the Arthur Hall Insurance dedicated assistance line at 1-??-??-?? between the hours of 9:00 am to 6:30 pm Eastern Time Monday through Friday, excluding major US holidays.

We sincerely regret any inconvenience or concern this incident has caused.

Sincerely,

Arthur Hall Insurance

## STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

### Activate Identity Monitoring



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(activation deadline)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s\_u>>

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

If you prefer to activate these services offline and receive monitoring alerts via the US Postal Service, you may activate via our automated phone system by calling 1-888-653-0511, Monday through Friday, 8:00 a.m. to 5:30 p.m. Central time, excluding major U.S. holiday. Please have your membership number located in your letter ready when calling. Please note that to activate monitoring services, you will be required to provide your name, date of birth, and Social Security number through our automated phone system.

### **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, 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 District of Columbia residents*, the District of Columbia Attorney General may be contacted at: 400 6<sup>th</sup> Street, NW, Washington, D.C. 20001; 202-727-3400; and [oag@dc.gov](mailto: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 [www.oag.state.md.us](http://www.oag.state.md.us). Arthur Hall Insurance is located at 101 E Chestnut Street, West Chester, PA 19380.

*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](http://www.ncdoj.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 violators. 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](http://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 Rhode Island residents*, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; [www.riag.ri.gov](http://www.riag.ri.gov); and 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are [#] Rhode Island residents impacted by this incident.