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December 3, 2018

# BY FIRST CLASS MAIL

Attorney General Joseph A. Foster Office of the Attorney General 33 Capitol Street Concord, NH 03302

> Re: Possible Data Security Incident

To Attorney General, Joseph A. Foster:

In accordance with N.H. Rev. Stat. Ann., § 359-C:20, and on behalf of our client, Asurint, we are apprising you of a possible data incident involving the unauthorized access of one (1) New Hampshire resident's personal information.

Specifically, on September 19, 2018, Asurint received a request for information about this resident from an individual purporting to be affiliated with a staffing company. Asurint received this request through normal procedures which includes receiving a certification from the individual placing the order that they had appropriate consent in order to obtain the information. As is its standard practice, Asurint released a background check report following this request to the requesting party. The background report included credit details such as the type of account established, the date established, credit limit or amount of loan balance, and payment history. Information within the credit report did not include account numbers, PIN numbers or a credit score.

Asurint first became aware of the issue involving personal information on October 16, 2018 after billing discussions with the staffing company. The staffing company conducted an internal investigation which revealed an unauthorized request had been made to it using the staffing company's former employee's log in credentials. In order to place the order in Asurint's system, the individual had to have the resident's Social Security number already which was not provided by Asurint. The discovery of this incident was made after the release of information. As noted above, specific financial account numbers and credit score details were not included in this report; however, the information did include the resident's name, date of birth, and a note that the Social Security number may be associated with the resident's name.





Asurint has initiated their own internal investigation and applied additional internal controls to this staffing company to prevent this type of incident from occurring in the future. Asurint is also very aware of the concern an incident such as this can create and is offering the individual potentially affected by this incident one (1) year's-worth of the LifeLock Standard Membership program available through LifeLock at www.lifelock.com. This resident was mailed a notification letter on December 4, 2018. Assurint also provided additional information including the Steps You Can Take to Protect Your Information as guidance on further protecting personal data.

At this time, Asurint has no reason to believe information contained within the released report was misused; however, the resident is being mailed a notification letter and we are apprising you in an abundance of caution. A sample copy of the notification letter is included in this letter. If you have any questions or concerns, please contact Ms. Kelly Uebel at kuebel@asurint.com or 216-420-5527.

Respectfully,

SEYFARTH SHAW LLP

Edward L. Murphree Counsel

**ELM** Enclosures



XXXXXX

#### Dear xxxxxxx:

We are writing to inform you of an incident potentially impacting your personal information. On September 19, 2018, Asurint received a request for information about you from an individual purporting to be affiliated with a staffing company. Asurint received this request through normal procedures which includes receiving a certification from the individual placing the order that they had appropriate consent from you in order to obtain the information. As is our standard practice, Asurint released a background check report following this request to the requesting party. The background report included credit details such as the type of account established, the date established, credit limit or amount of loan, balance and payment history. Information within the credit report does not include account numbers, pin numbers or a credit score.

Asurint first became aware of the issue involving your personal information on October 16, 2018 after billing discussions with the staffing company. The staffing company conducted an internal investigation which revealed an unauthorized request had been made to us using the staffing company's former employee's log in credentials. In order to place the order in our system, the individual had to have your social security number already which was not provided by Asurint. Our discovery of this incident was made after the release of your information. As noted above, specific financial account numbers and credit score details were not included in this report; however, the information did include your name, date of birth and a note that the social security number may be associated with your name.

We regret that this incident occurred and take the security of our information very seriously. As a result of our determination, we have initiated our own internal investigation and applied additional internal controls to this staffing company to prevent this type of incident from occurring in the future. We are also very aware of the concern an incident such as this can create. Accordingly, we are offering individuals potentially affected by this incident one (1) year's worth of the LifeLock Standard Membership program available through LifeLock at <a href="https://www.lifelock.com">www.lifelock.com</a>. If you would like to take advantage of this offer, please sign up for the service and email your receipt to <a href="mailto:compliance@asurint.com">compliance@asurint.com</a>. Please place "Reimbursement Request: LifeLock Annual Membership" in the subject line of the email. We will then coordinate with our Accounting team to issue you a reimbursement check for the cost of the program at the annual membership price of \$109.89 plus applicable sales tax. Please note that this offer is only for one (1) year and must be signed up for under your name only. It will be your responsibility to either continue payments or cancel the membership after the expiration of the initial one (1) year period. Additional information is attached to this letter, including the Steps You Can Take to Protect Your Information as guidance on further protecting your personal data.

Should you have further questions or concerns, we can be reached at <a href="mailto:com">compliance@asurint.com</a> or you may reach me directly at 216.420.5527.

Respectfully,

Kelly Uebel

Kelly Uebel General Counsel Asurint

#### **Steps You Can Take to Protect Your Information**

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity

As a precautionary measure, we recommend that you remain vigilant by closely reviewing your account statements and credit reports. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained.

Additionally, you should report any fraudulent activity or suspected incidence of identity theft to proper law enforcement authorities, To file a complaint with the FTC, go to www.ftc.gov/idtheft or call 1-877-ID-THEFT (877-438-4338). Complaints filed with the FTC will be added to the FTC's Identity Theft Data Clearinghouse, which is a database made available to law enforcement agencies.

## Copy of Credit Report

You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting http://www.annualcreditreport.com or calling 877-322-8228. Or you can 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 is provided below.

#### Fraud Alert

You may also consider placing a fraud alert on your credit report. An initial fraud alert is free and will remain on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies using the information below:

Equifax	Experian	TransUnion
(888) 766-0008	(888) 397-3742	(800) 680-7289
www.equifax.com	www.experian.com	www.transunion.com
P.O. Box 740241	P.O. Box 9532	P.O. Box 2000
Atlanta, GA 30374	Allen, TX 75013	Chester, PA 19022

### Additional Free Resources on Identity Theft

• A copy of Take Charge: Fighting Back Against Identity Theft, a comprehensive guide from the FTC to help you guard against and deal with identity theft, can be found on the FTC's website at http://www.ftc.gov/bcp/edu/pubs/consumer/idtheft/idt04.shtm.