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MAY 03 2021

CONSUMER PROTECTION

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426 W. Lancaster Avenue, Suite 200  
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April 28, 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 Colorado Farm Bureau Insurance Company (“CFBIC”) located at 9177 East Mineral Circle, Centennial, CO 80112, 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 event is ongoing, and this notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, CFBIC 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 January 6, 2021, CFBIC learned that it was the target of a phishing email campaign. As a result of this campaign, two (2) email accounts were believed to be compromised. CFBIC immediately took steps to secure the email accounts and launched an in-depth investigation to determine the nature and scope of the incident.

CFBIC subsequently determined, with the help of outside computer forensic investigators, that the contents of two (2) email accounts may have been accessible to an unauthorized actor for limited periods on December 3, 2020 and January 7, 2021, through the compromise of the email account credentials. CFBIC conducted an extensive review of the impacted accounts to confirm the information potentially accessible to the unauthorized actor, and the identities of the impacted individuals. On or around March 12, 2021, CFBIC confirmed the identities of the individuals who may have had information accessible as a result of the incident and promptly launched a review of its files to ascertain address information for the potentially impacted individuals.

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The information related to the New Hampshire resident that could have been subject to unauthorized access includes name and Social Security number.

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

On April 28, 2021, CFBIC began providing written notice of this incident to all affected individuals, which includes approximately one (1) New Hampshire resident. 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**

CFBIC takes this incident and the security of personal information seriously. Since discovering this event, CFBIC has been working diligently with outside forensic investigators to determine what happened and what information was accessible as a result of this incident. This involved a programmatic and manual data review process. As part of CFBIC's ongoing commitment to the security of personal information in its care, CFBIC is working to review its existing policies and procedures and to implement additional safeguards to further secure the information in its systems.

CFBIC is providing written notice to those individuals who may be affected by this event. This notice includes an offer of complimentary access to credit monitoring and identity restoration services for twenty-four (24) months through Kroll, and the contact information for a dedicated call center for potentially affected individuals to contact with questions or concerns regarding this incident. Additionally, CFBIC is providing potentially affected individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Southern Farm is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, 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. Southern Farm is also notifying other state regulators, as appropriate.

To date, CFBIC has not received any reports of actual or attempted misuse of any personal information for any potentially impacted individual.

The Office of the Attorney General  
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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) 930-4802.

Very truly yours,

A handwritten signature in black ink, appearing to read 'SS', with a stylized flourish at the end.

Samuel Sica, III of  
MULLEN COUGHLIN LLC

SZS/jcj

# **EXHIBIT A**



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

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

<<b2b\_text\_3(SubjectLine)>>

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

Colorado Farm Bureau Insurance Company ("CFBIC") is writing to inform you of a recent event that may impact the security of some of your information. To date, we have not received any reports of actual or attempted misuse of your information; however, we take this event seriously and are providing you with information about the event and steps you may take to help protect your personal information, should you feel it is appropriate to do so.

**What Happened?** On or about January 6, 2021, CFBIC learned that it was the target of a phishing email campaign. As a result of this campaign, two (2) email accounts were believed to be compromised. CFBIC immediately took steps to secure the email accounts and launched an in-depth investigation to determine the nature and scope of the incident.

CFBIC subsequently determined through its investigation that the contents of two (2) email accounts may have been accessible to an unauthorized actor for limited periods on December 3, 2020 and January 7, 2021, through the compromise of the email account credentials. CFBIC conducted an extensive review of the impacted accounts to confirm the information potentially accessible to the unauthorized actor, and the identities of the impacted individuals. On or around March 12, 2021, we confirmed the identities of the individuals who may have had information accessible as a result of the incident and promptly launched a review of our files to ascertain address information for the potentially impacted individuals.

**What Information Was Involved.** The following information was contained within the impacted email accounts: your <<b2b\_text\_1(DataElements)>><<b2b\_text\_2(DataElements)>>. To date, we have not received any reports of actual or attempted misuse of your information; however, as a result of this incident, we are providing this notice out of an abundance of caution and pursuant to applicable law.

**What We Are Doing.** We take this incident and the security of your personal information seriously. Since discovering this event, we have been working diligently to determine what happened and what information was accessible as a result of this incident. This involved a programmatic and manual data review process. As part of our ongoing commitment to the security of personal information in our care, we are working to review our existing policies and procedures and to implement additional safeguards to further secure the information in our systems. We also will be notifying state regulators, as required.

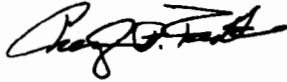
As an added precaution, we are also offering you complimentary access to 24 months of Credit Monitoring, Fraud Consultation and Identity Theft Restoration services through Kroll. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Additional information describing your services is included with this letter.

**What You Can Do.** We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and monitor your credit reports for suspicious activity. You may also review the information contained in the attached "Steps You Can Take to Help Protect Personal Information." There you will also find more information on the credit monitoring services we are making available to you. While CFBIC will cover the cost of these services, you will need to complete the activation process. Activation instructions are attached to this letter.

**For More Information.** If you have additional questions, please call our dedicated assistance line at 1-855-508-3305, Monday through Friday, 9:00am to 6:30pm Eastern Standard Time (except major U.S. holidays). You may also write to Colorado Farm Bureau Insurance Company at 9177 East Mineral Circle, Centennial, CO 80112.

We apologize for any inconvenience or concern this event may cause.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl Radke", written in a cursive style.

Cheryl Radke  
Colorado State Manager  
Colorado Farm Bureau Insurance Company



## STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

### **Activate Your Credit Monitoring**

Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

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

*You have until **July 30, 2021** to activate your identity monitoring services.*

Membership Number: <<Member ID>>



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

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

#### **Triple Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data at any of the three national credit bureaus—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you will 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, military identification, 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 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 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](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/>.