

Holland & Knight

1180 West Peachtree Street, Suite 1800 | Atlanta, GA 30309 | T 404.817.8500 | F 404.881.0470
Holland & Knight LLP | www.hklaw.com

Bess Hinson
+1 404-817-8527
Bess.Hinson@hklaw.com

RECEIVED

SEP 28 2021

CONSUMER PROTECTION

September 24, 2021

Via US Certified Mail

Office of Attorney General
33 Capitol Street
Concord, New Hampshire 03301

Re: Data Security Incident Notification

Dear Attorney General Formella:

I'm writing on behalf of Digital Insurance, LLC doing business as OneDigital to inform you of a data security incident that affects New Hampshire residents.

On or around January 20, 2021, OneDigital detected unusual activity on its network. In response to this incident, OneDigital conducted a thorough forensic analysis and investigation. Based on the investigation's findings, we determined that an unauthorized party may have obtained access to a corporate computer server containing company information. Following the conclusion of the computer forensic investigation, we performed a full audit of the compromised company information located on the server to determine whether it included any personal information. Upon performing a review of the audit results, we determined that the compromised company information contained some personal information about some company employees.

Based on our analysis of the results, we can confirm that between the dates of January 20 and January 21, 2021, the unauthorized party may have accessed or acquired some of our employees' personal information, including personal information about 7 New Hampshire residents. The personal information included name, address, date of birth, health insurance number, and Social Security number.

OneDigital offers employers a sophisticated combination of strategic benefit advisory services, analytics, compliance support, human resources management tools and comprehensive insurance offerings. The company remains committed to the security and protection of data about its employees and clients. OneDigital maintains written privacy and security policies and procedures, and following this incident, we have taken steps to further strengthen and harden the security of systems in our network, including enhancing administrative and technical safeguards. These administrative and technical safeguards include but are not limited to the following:

September 24, 2021

Page 2

expanding the use of multi-factor authentication, more frequent and rigorous training of employees on avoiding phishing attempts, additional filtering of malicious links and impersonation protection policies, and enhancing network monitoring.

On September 24, 2021, we will mail notification letters to the affected New Hampshire residents. OneDigital has established a dedicated call center service to assist affected residents with questions and is offering complimentary access to 12 months of identity theft protection services through Kroll Essential Monitoring Services.

Sincerely yours,

HOLLAND & KNIGHT LLP

A handwritten signature in blue ink, appearing to read "Elizabeth H. Hinson", with a long, sweeping underline.

Bess Hinson

BH



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

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

RE: Notice of Data Breach

Dear <<first_name>> <<last_name>>:

We are writing to inform you of a security incident at OneDigital, the steps we are taking to protect you following the incident, and the steps you can take to protect yourself.

What Happened

On or around January 20, 2021, OneDigital detected unusual activity on its network. Upon discovery of the unusual activity, OneDigital promptly removed access to all systems in our data center and secured the network to block, contain and eliminate the unauthorized individual(s) and remediate any potential negative impact.

What Information Was Involved

Based on our investigation, we believe that an unauthorized individual(s) may have obtained personal data about you and your enrolled dependent(s) that was collected in the course of providing health and welfare plan benefits services. This information may include your <<b2b_text_1(DataElements)>>.

What We Are Doing

In response to this incident, OneDigital conducted a thorough forensic analysis and investigation. After blocking, containing, and eliminating the unauthorized individual(s), OneDigital implemented additional security measures to further fortify its network's security measures and protocols, including enhancing administrative and technical safeguards and instituting more frequent and rigorous security training.

Additionally, to assist you in monitoring your accounts, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. 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. Your identity monitoring services include Credit Monitoring, Web Watcher, Public Persona, Quick Cash Scan, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

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

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

Membership Number: <<Membership Number (s_n)>>

Additional information describing your services is included with this letter.

What You Can Do

As always, we recommend you be on the alert for suspicious activity related to your financial accounts and credit reports. We encourage you to regularly monitor your statements and records to ensure there are no transactions or other activities that you did not initiate or authorize. You may file a police report regarding this incident. For more information on how to protect against identity theft, please review the enclosed "Additional Resources" section included with this letter. This section describes additional steps you can take to help protect your identity, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file.

For More Information

Please be assured that we are committed to helping you protect your protected health information and identity and ensuring that your information is safe and secure. We regret this incident and apologize for any concern it may have caused you.

If you have further questions regarding this matter, please do not hesitate to call 1-855-551-1516 Monday through Friday, from 8:00 am to 5:30 pm Central Time, excluding some U.S. holidays.

Sincerely,

OneDigital Corporate Privacy Officer



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 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.

Web Watcher

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

Public Persona

Public Persona monitors and notifies when names, aliases, and addresses become associated with your Social Security number. If information is found, you will receive an alert.

Quick Cash Scan

Quick Cash Scan monitors short-term and cash-advance loan sources. You will receive an alert when a loan is reported, and you can call a Kroll fraud specialist for more information.

\$1 Million Identity Fraud Loss Reimbursement

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

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.

Additional Resources

To obtain information about fraud alerts, no charge security freezes, and preventing identity theft you may contact the Federal Trade Commission, credit reporting agencies, or your state consumer protection agency. Federal law allows you to get a free copy of your credit report every 12 months from each credit reporting company via www.annualcreditreport.com.

Credit Reporting Bureaus		Contact Information
Equifax	P.O. Box 740241, Atlanta, GA 30374-0241; 866-349-5191; https://www.equifax.com/	
Experian	475 Anton Blvd., Costa Mesa, CA 92626; 714-830-7000; https://www.experian.com/	
TransUnion	P.O. Box 2000 Chester, PA 19016-2000; 833-395-6938; https://www.transunion.com/	
Federal Agency		Contact Information
Federal Trade Commission	600 Pennsylvania Avenue, NW, Washington, DC 20580; 202-326-2222; https://www.consumer.gov/	
State Agencies		Contact Information
Alabama	Alabama Office of the Attorney General; 1-800-392-5658; http://www.ago.state.al.us/	
Alaska	Office of Attorney General; 888-576-2529; http://www.law.alaska.gov/departments/civil/consumer/	
Arizona	Arizona Office of the Attorney General-Phoenix; 602-542-5763; http://www.azag.gov/	
Arkansas	Arkansas Office of the Attorney General; 1-800-482-8982; http://www.arkansasag.gov/	
California	California Office of the Attorney General; 1-800-952-5225; http://www.oag.ca.gov/	
Colorado	Colorado Office of the Attorney General; 1-800-222-4444; http://www.stopfraudcolorado.gov/	
Connecticut	Connecticut Office of the Attorney General; 860-808-5420; http://www.ct.gov/ag	
Delaware	Delaware Department of Justice; 1-800-220-5424; http://www.attorneygeneral.delaware.gov/	
Florida	Florida Office of the Attorney General; 1-866-966-7226; http://myfloridalegal.com/	
Georgia	Georgia Office of the Attorney General; 1-800-869-1123; http://consumer.georgia.gov/	
Hawaii	Hawaii Office of the Attorney General; 808-586-1500; http://ag.hawaii.gov/	
Idaho	Idaho Office of the Attorney General; 1-800-432-3545; http://www.ag.idaho.gov/	
Illinois	Illinois Office of the Attorney General; 1-800-386-5438; http://www.illinoisattorneygeneral.gov/	
Indiana	Indiana Office of the Attorney General; 1-800-457-8283; https://www.in.gov/attorneygeneral/	
Iowa	Iowa Office of the Attorney General; 1-888-777-4590; http://www.iowaattorneygeneral.gov/	
Kansas	Kansas Office of the Attorney General; 1-800-432-2310; http://www.ag.ks.gov/	
Kentucky	Kentucky Office of the Attorney General; 1-888-432-9257; https://ag.ky.gov/	
Louisiana	Louisiana Office of the Attorney General; 1-800-351-4889; http://www.ag.state.la.us/	
Maine	Maine Attorney General's Office; 1-800-436-2131; http://www.maine.gov/ag	
Maryland	Maryland Office of the Attorney General; 888-743-0023; http://www.marylandattorneygeneral.gov/	
Massachusetts	Massachusetts Office of the Attorney General; 617-727-8400; https://www.mass.gov/	
Michigan	Michigan Office of the Attorney General; 517-335-0855; http://www.michigan.gov/ag	
Minnesota	Office of the Attorney General; 1-800-657-3787; http://www.ag.state.mn.us/	
Mississippi	Mississippi Office of the Attorney General; 1-800-281-4418; http://www.ago.state.ms.us/	
Missouri	Missouri Attorney General's Office; 1-800-392-8222; http://www.ago.mo.gov/	
Montana	Montana Department of Justice; 1-800-481-6896; https://dojmt.gov/consumer	

Nebraska Nebraska Office of the Attorney General; 1-800-727-6432; <http://www.ago.nebraska.gov/>

Nevada Nevada Office of the Attorney General; 702-486- 3132; <http://www.ag.nv.gov/>

New Hampshire New Hampshire Office of the Attorney General; 1-888-468-4454; <http://www.doj.nh.gov/consumer>

New Jersey Department of Law and Public Safety; 1-800-242-5846; <http://www.njconsumeraffairs.gov/>

New Mexico Office of Attorney General; 1-844-255-9210; <http://www.nmag.gov/>

New York Office of the Attorney General; 1-800-771-7755; <http://www.ag.ny.gov/>

North Carolina North Carolina Office of the Attorney General; 1-877-566-7226; <http://www.ncdoj.gov/>

North Dakota Office of the Attorney General; 1-800-472-2600; <https://www.attorneygeneral.nd.gov/>

Ohio Ohio Office of the Attorney General; 1-800-282-0515; <http://www.ohioattorneygeneral.gov/>

Oklahoma Oklahoma Office of the Attorney General; 405-521-3921; <http://www.oag.ok.gov/>

Oregon Oregon Department of Justice; 1-877-877-9392; <http://www.doj.state.or.us/consumer>

Pennsylvania Pennsylvania Office of the Attorney General; 1-800-441-2555; <http://www.attorneygeneral.gov/>

Puerto Rico Puerto Rico Department of Consumer Affairs; 787-722-7555; <http://www.pr.gov/CaruselServicios>

Rhode Island Rhode Island Department of the Attorney General; 401-274-4400; <http://www.riag.state.ri.us/>

South Carolina South Carolina Department of Consumer Affairs; 1-800-922-1594; <http://www.consumer.sc.gov/>

South Dakota South Dakota Office of the Attorney General; 1-800-300-1986; <http://atg.sd.gov/>

Tennessee Tennessee Office of the Attorney General; 615-741-1671; <http://www.tn.gov/attorneygeneral>

Texas Texas Office of the Attorney General; 1-800-621-0508; <https://www.texasattorneygeneral.gov/>

Utah Utah Office of the Attorney General; 1-800-244-4636; <https://attorneygeneral.utah.gov/>

U.S. Virgin Islands V.I. Department of Licensing and Consumer Affairs; 340-773-2226; <http://www.dlca.vi.gov/>

Vermont Vermont Office of the Attorney General; 1-800-649-2424; <http://ago.vermont.gov/>

Virginia Virginia Office of the Attorney General; 1-800-552-9963; <http://www.oag.state.va.us/>

Washington Washington Office of the Attorney General; 1-800-551-4636; <http://www.atg.wa.gov/>

West Virginia Office of the Attorney General; 1-800-368-8808; <http://www.ago.wv.gov/>

Wisconsin Wisconsin Department of Justice; 1-800-998-0700; <https://www.doj.state.wi.us/>

Wyoming Office of the Attorney General; 1-800-438-5799; <http://ag.wyo.gov/cpu>

District of Columbia DC Office of the Attorney General and Public Advocacy; 202-442-9828; <http://oag.dc.gov>