



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED
AUG 04 2022
CONSUMER PROTECTION

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75 S. Clinton Avenue, Suite 510
Rochester, NY 14604

August 1, 2022

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 Digital Insurance LLC d/b/a OneDigital ("OneDigital") located at 200 Galleria Parkway, Suite 1950, Atlanta, GA 30339, an insurance brokerage firm whose customers include 2Life Communities ("2Life") located at 30 Wallingford Road, Brighton, MA 02135. OneDigital is writing to notify your office of an incident that may affect the security of certain personal information received from 2Life and relating to three (3) New Hampshire residents. By providing this notice, OneDigital 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 Wednesday, June 8, 2022, OneDigital became aware of potential unauthorized access to OneDigital's environment. In response, OneDigital engaged privacy counsel Mullen Coughlin LLC, and worked with third-party computer forensic specialists through counsel to determine the nature and scope of any potential unauthorized activity, and to determine if any legally protected information was potentially impacted.

The bulk of the impacted information did not relate to OneDigital, but instead belonged to a limited number of OneDigital's business customers located largely in Massachusetts. On June 22, 2022, OneDigital reached out to its business customers to gather current address information for notification purposes.

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On Wednesday, July 13, 2022, 2Life provided address information for purposes of notification. A national change of address search was run, which confirmed on July 21, 2022 the addresses and states of residence for impacted individuals, including three (3) New Hampshire residents. On Wednesday, July 27, 2022, 2Life requested that OneDigital provide notification to certain state regulators, including your office, on its behalf.

This event has had no impact on any OneDigital operations, and OneDigital has found no sign of any ransomware or other malware within its network environment. Further, OneDigital is not aware of any public disclosure or misuse of potentially impacted information.

Notice to New Hampshire Residents

On or about July 29, 2022, OneDigital provided written notice of this incident to three (3) New Hampshire residents on behalf of 2Life. 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 discovering the event, OneDigital moved quickly to investigate and respond to the incident, assess the security of OneDigital systems, and identify potentially affected individuals. OneDigital is also working to implement additional safeguards and training to its employees. Further, OneDigital notified federal law enforcement regarding the event.

Additionally, OneDigital is providing access to credit monitoring services for two (2) years through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals. OneDigital is also providing impacted 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. OneDigital is 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 review 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.

OneDigital is also providing written notice of this incident to certain state and federal regulators on behalf of 2Life.

Office of the New Hampshire 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) 930-4741.

Very truly yours,

James Paulino of
MULLEN COUGHLIN LLC

JMP/ams
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 999
Suwanee, GA 30024

July 29, 2022

611150*****SNGLP

SAMPLE A. SAMPLE - 2life

APT ABC

123 ANY ST

ANYTOWN, US 12345-6789



Re: Notice of Data Security Event/Breach

Dear Sample A. Sample:

Benemax, a division of Digital Insurance, LLC dba OneDigital ("OneDigital"), a business associate of your current or former employer, is writing to inform you, on behalf of [Company], of an incident that may affect the security of your personal information. We take this incident very seriously and are providing you with information and access to resources so that you can protect yourself against the possibility of misuse of your personal information, should you feel it appropriate to do so.

What Happened? On June 8, 2022, OneDigital became aware of potential suspicious activity relating to individual information within OneDigital's environment. We immediately began an investigation to confirm the security of our network and to determine the nature and scope of this event. With the assistance of third-party forensic investigators, we learned that OneDigital was the victim of unauthorized access to OneDigital systems and data by an unauthorized third party. OneDigital, with the assistance of third-party forensic specialists, confirmed the security of its environment and initiated a comprehensive review to identify any individuals whose information was contained in the impacted systems and potentially affected by the incident. On June 16, 2022, OneDigital concluded its extensive review of the potentially impacted data and then began working with [Company] to determine contact information and notify potentially impacted individuals.

What Information Was Involved? Our investigation determined that at the time of the event, your name and [Extra1], [Extra2], [Extra3], [Extra4], [Extra5], [Extra6], [Extra7], [Extra8], [Extra9], and [Extra10] were stored within the potentially impacted data, which information we processed on behalf of [Company]. To date, OneDigital has not received any reports of fraudulent misuse of any information potentially impacted by this event and continues to monitor for any reports of misuse.

What We Are Doing. OneDigital is committed to, and takes very seriously, its responsibility to protect all data entrusted to us by [Company]. We are continuously taking steps to enhance data security protections. As part of our incident response, we changed user account passwords to prevent further unauthorized access and disciplined employees who were not following proper protocol. We have also continued ongoing efforts to enhance security controls and to implement additional controls to help protect our systems from unauthorized access.

As an added precaution, we are offering you access to 24 months of free credit/identity monitoring and identity restoration services through Experian. Instructions for enrolling in the credit monitoring services, as well additional information on how to better protect against identity theft or fraud, are included in the attached *Steps You Can Take to Help Protect Personal Information*.

What You Can Do. You can review the attached *Steps You Can Take to Help Protect Personal Information*. You can also enroll to receive the free credit/identity monitoring and identity restoration services being offered to you.

For More Information. If you have questions or concerns that are not addressed in this notice letter, you may call the dedicated assistance line we have established regarding this incident. Please call (833) 468-0630 toll-free Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number B058102.

We sincerely regret the inconvenience and concern this incident causes for you. We remain committed to safeguarding information in our care and will continue to take proactive steps to enhance data security.

Sincerely,

OneDigital Corporate Privacy Officer

