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June 8, 2020

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

Re: Potential Data Incident at Henriott Group

Dear Attorney General MacDonald:

We represent Henriott Group ("Henriott"), an insurance agency, located in Lafayette, Indiana, with respect to a potential data incident that is described in more detail below. Henriott takes the security and privacy of the information in its control seriously, and took steps to prevent a similar incident from reoccurring in the future.

1. **Nature of the incident**

On December 12, 2019, Henriott discovered that an unknown individual gained access to an employee's email account. Henriott launched a four-part intensive investigation lead by a cybersecurity and computer forensic firm, as well as a consulting firm expert in data mining and information retrieval solutions. The four-part investigation determined that the incident occurred through a phishing campaign, and that only one email account was compromised. Furthermore, it was determined that the threat actor was connected to the subject email account and potentially active for no more than forty five (45) minutes. The content of the affected email account was closely analyzed to determine whether and to what extent it contained any personally identifiable information ("PII"), and the specific PII that it contained. The names of the affected individuals was correlated with the specific individuals' PII contained in the subject email account. And finally, the addresses of the individuals was determined for notification purposes.

2. **Number of New Hampshire residents affected**

One (1) New Hampshire resident was potentially affected. Only the residents' first name, last name, and driver license number is known to be potentially accessed.

Notice was made on June 03, 2020.

3. **Steps taken.**

Henriott takes the security of the information within its control very seriously.

Henriott upgraded its email subscription to Office 365 that provides more security features. Notably, it includes the ability to implement multi-factor authentication ("MFA"), mobile device management, and geo-fencing. MFA was scheduled to be implemented on May 01, 2020.

Out of an abundance of caution, Henriott also moved is line-of-business management systems to the cloud.

It should be underscored that Henriott previously implemented certain data and cyber security programs. Notably, it conducted phishing email training, and implemented a phishing training solution that sends innocuous phishing messages to employees, and reports on employees that clicked links in those innocuous messages. The results of that program are reviewed monthly by Kelley Henriott and other executives, and re-training is provided to employees as necessary. Henriott's phishing training solution is provided by Cincinnati Financial Services. (It previously procured a similar solution from its MSP. That solution was authored by Sophos.)

It should also be underscored that Henriott continues to perform quarterly risk assessments. Every quarter, Henriott's MSP scans the network any discoverable vulnerabilities using Rapid Fire. For example, the system identifies what hardware assets are not current on security patches. The scanning system includes a HIPAA module that searches for personally identifiable information in order to help management assess whether it is stored in authorized places, for example. Risk Assessment Reports are reviewed by the MSP; the MSP advises executive level directors of the assessment results and any recommended action items. Henriott has a process to review, authorize, and implement those actionable items.

4. Contact information.

Henriott remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at Anjali.Das@WilsonElser.com or 312-821-6164.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP

Anjali C. Das