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CONSUMER PROTECTION

Ryan Loughlin
Office: 267-930-4786
Fax: 267-930-4771
Email: rloughlin@mullen.law

1275 Drummers Lane, Suite 302
Wayne, PA 19087

December 6, 2017

VIA U.S. MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Attorney General MacDonald:

We represent The Horton Group, Inc. ("Horton"), 10320 Orland Parkway, Orland Park, IL 60467, and write to notify your office, on behalf of Horton and certain Horton clients, of an incident that may affect the security of personal information relating to approximately one (1) New Hampshire resident. The investigation into this event is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Horton does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Nature of the Data Event

Horton provides insurance and employee benefit services to its clients. On August 22, 2017, Horton received reports of unusual activity in an employee's email account. Horton immediately launched an investigation and ultimately learned that it was the victim of email phishing attacks that prompted certain employees to provide their credentials to an unauthorized actor or actors. The investigation included working with third-party forensic investigators to determine the full nature and scope of the event. Based upon available forensic evidence, it appears the impacted email accounts may have been accessible to an unauthorized actor(s) between June 2 and September 13, 2017. Through the investigation, Horton determined that personal information for certain individuals was present in impacted email accounts. Horton then worked diligently to determine which records may be impacted and to which of its clients the data related. This process involved a manual and programmatic review of the impacted accounts to determine the precise data present in the affected emails. This review concluded on October 28, 2017. Horton then worked with its business partners to obtain address information in order to provide written notice on behalf of its business partners as requested.

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The investigation determined that the following information for a certain New Hampshire resident was present in the impacted account: name and Social Security number. To date, the investigation has found no evidence of any actual or attempted misuse of personal information present in the impacted email accounts.

Notice to New Hampshire Resident

On or around December 6, 2017 Horton will begin providing written notice of this incident to potentially affected individuals affiliated with certain Horton clients, which includes approximately one (1) New Hampshire resident. Written notice will be provided in substantially the same form as the letter attached here as *Exhibit A*.

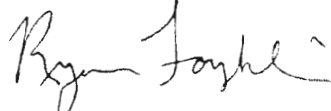
Other Steps Taken and To Be Taken

Upon discovering unusual activity affiliated with certain employee email boxes, Horton immediately launched an investigation to determine the nature and scope of this incident, as well as determine what data may potentially be affected. The investigation included working with third-party forensic experts. Horton provided notice to all clients whose employee data was present in the affected emails and will be providing written notice to those individuals affiliated with clients whose data was present in the impacted emails and who requested Horton assist in the notification to their impacted employees. This notice will include an offer of complimentary access to one (1) year of credit and identity monitoring services, including identity restoration services, through ID Experts, and the contact information for a dedicated call center for potentially affected individuals to contact with questions or concerns regarding this incident. Additionally, Horton is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud, including 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 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. Horton will also be providing notice of this event to other entities as may be required under the applicable state laws.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at 267-930-4786.

Very truly yours,



Ryan Loughlin of
MULLEN COUGHLIN LLC

EXHIBIT A

HORTON

C/O ID Experts
P.O. Box 10444
Dublin, OH 43017-4044

<<First Name>> <<Last Name>>
<<Address>>
<<City>>, <<State>> <<Zip>>

Date

Re: Notice of Data Breach

Dear <<First Name>> <<Last Name>>,

We write to inform you of a data privacy incident that may affect the security of some 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 your personal information, should you feel it is appropriate to do so. We have your data because we either provide insurance and employee benefit services to <<CLIENT>> or provided quotes for insurance and employee benefits to <<CLIENT>>.

What Happened? On August 22, 2017, The Horton Group (“Horton”) received reports of unusual activity in an employee’s email account. Horton immediately launched an investigation and ultimately learned that our company was the victim of email phishing attacks that prompted certain employees to provide their credentials to an unauthorized actor or actors. The investigation into this incident included working with third-party forensic investigators to determine the full nature and scope of the event. The investigation determined that personal information for certain individuals was present in impacted email accounts. Based upon available forensic evidence, it appears the impacted email accounts may have been accessible to an unauthorized actor(s) between June 2 and September 13, 2017. **To date, we have no evidence of any actual or attempted misuse of personal information present in the impacted email accounts.**

What Information Was Involved? Horton worked diligently to determine which records may be impacted and to what clients those records relate. This process involved a manual and programmatic review of the impacted accounts to determine the precise data present in the affected emails. This review concluded on October 28, 2017. Our investigation has determined that the information present in the impacted email account includes your name and <<Data Elements>>.

What We Are Doing. We take the security of personal information in our care very seriously. We are working diligently to educate our employees about phishing scams and to ensure the ongoing security of our networks. We have made <<CLIENT>> aware of this incident, and will be notifying other entities as may be required under the applicable state laws.

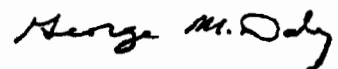
As an added precaution, we are also offering you access to one (1) year of credit monitoring and identity theft restoration services through ID Experts at no cost to you. The cost of this service will be paid for by Horton. We encourage you to enroll in these services, as we are not able to act on your behalf to enroll you in the credit monitoring service.

What You Can Do. Please review the enclosed “Steps You Can Take to Protect Your Information.” You can also enroll to receive the free credit monitoring and identity theft protection services we are offering.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at (888) 684-4961, Monday through Friday between 8 a.m. and 8 p.m. Eastern.

Again, Horton takes the privacy and security of the personal information in our care seriously. We sincerely regret any inconvenience or concern this incident has caused you.

Sincerely,

A handwritten signature in black ink that reads "George M. Daly". The signature is written in a cursive style with a large, prominent "G" and "D".

George Daly
Chief Operating Officer
The Horton Group

STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

Enroll in Credit Monitoring

Your Access Code: <<CODE>>

While, we have no evidence of any actual or attempted misuse of personal information present in the impacted email accounts, in an abundance of caution, we are offering you access to one (1) year of credit monitoring and identity theft restoration services through ID Experts at no cost to you. Information on how to enroll in the credit monitoring and identity theft protection services can be found below:

- 1. Website and Enrollment.* Go to <https://ide.myidcare.com/thehortongroup> and follow the instructions for enrollment using your Access Code provided above. Once you have completed your enrollment, you will receive a welcome letter by email (or by mail if you do not provide an email address when you sign up). The welcome letter will direct you to the exclusive ID Experts' Member Website where you will find other valuable educational information.
- 2. Activate the Credit Monitoring* provided as part of your membership with ID Experts. Credit monitoring is included in the membership, but you must personally activate it for it to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, ID Experts will be able to assist you.
- 3. Telephone.* Contact ID Experts at (888) 684-4961 to gain additional information about the membership and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

If you discover any suspicious activity in your accounts or your credit reports and have enrolled with ID Experts, notify them immediately by calling or by visiting their Member website and filing a theft report.

If you file a theft report with ID Experts, you will be contacted by a member of the Recovery Department who will help you determine the cause of the suspicious activity. Should you fall victim to identity theft, you will be assigned an ID Experts Recovery Advocate who will work on your behalf to identify, stop, and reverse the damage quickly.

Please Note: Minors, under the age of 18, should not have a credit history established and are under the age to secure credit. Therefore, credit monitoring may not be applicable at this time. All other services provided in the membership will apply. No one is allowed to place a fraud alert on your credit report except you, please follow the instructions below to place the alert.

Monitor Your Accounts

Credit Reports. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

Fraud Alerts. At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below:

Equifax
P.O. Box 105069
Atlanta, GA 30348
800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19106
800-680-7289
www.transunion.com

Security Freeze. You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft and you provide the credit bureau with a valid police report, it cannot charge you to place, lift, or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. Fees vary based on where you live, but commonly range from \$3 to \$15. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. In order to request a security freeze, you will need to supply your full name, address, date of birth, Social Security number, current address, all addresses for up to five previous years, email address, a copy of your state identification card or driver's license, and a copy of a utility bill, bank or insurance statement, or other statement proving residence. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
www.freeze.equifax.com

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/

TransUnion
P.O. Box 2000
Chester, PA 19016
1-888-909-8872
[www.transunion.com/
credit-freeze/place-credit-freeze](http://www.transunion.com/credit-freeze/place-credit-freeze)

Additional Information. You can further educate yourself regarding identity theft, security freezes, fraud alerts, and the steps you can take to protect yourself against identity theft and fraud by contacting the Federal Trade Commission or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission encourages those who discover that their information has been misused to file a complaint with them. Instances of known or suspected identity theft should be reported to law enforcement, the Federal Trade Commission, and your state Attorney General. This notice has not been delayed as the result of a law enforcement investigation.

For Maryland residents, the Maryland Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and www.oag.state.md.us. The Horton Group, Inc. is located at 10320 Orland Parkway, Orland Park, IL 60467.

For North Carolina residents, the North Carolina Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at www.riag.ri.gov. A total of [NUMBER] Rhode Island residents are potentially impacted by this incident. You have the right to file and obtain a police report if you ever experience identity theft or fraud. Please note that, in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim.

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 agencies 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 a 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, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.