



Alyssa R. Watzman  
1700 Lincoln Street, Suite 4000  
Denver, Colorado 80203  
Alyssa.Watzman@lewisbrisbois.com  
Direct: 720.292.2052

May 24, 2019

File No. 28399.320

**VIA EMAIL**

Attorney General Gordon MacDonald  
Office of the Attorney General  
Consumer Protection Bureau  
33 Capitol Street  
Concord, NH 03301  
E-Mail: DOJ-CPB@doj.nh.gov

Re: Notice of Data Security Incident

Dear Attorney General MacDonald:

We represent Huggins Insurance ("Huggins"), located in Salem, Oregon, in connection with a recent data security incident that may have involved the personal information of two New Hampshire residents. Huggins has notified the affected individuals.

On January 16, 2019, Huggins learned that there had been unauthorized access to an employee's email account. Huggins immediately secured all employee accounts and began an investigation, which included engaging a forensics firm to determine what happened and whether personal information had been accessed without authorization. The forensics firm later informed Huggins that a second email account had been accessed without authorization. On April 3, 2019, Huggins learned that messages and attachments contained within the impacted accounts included personal information for individuals, some of whom were health plan participants. Huggins then worked with the health plans with which it had business associate agreements to confirm that the affected individuals were plan participants. Huggins also notified the Federal Bureau of Investigation (FBI) and all three credit reporting agencies. Huggins then worked to gather address information for all affected individuals. On May 24, 2019, Huggins notified the affected individuals of the incident and offered them complimentary credit monitoring services.

May 24, 2019  
Page 2

Please feel free to contact me should you require additional information.

Sincerely,



Alyssa R. Watzman of  
LEWIS BRISBOIS BISGAARD & SMITH LLP

Encl: Consumer Notification Letter

DEA:ARW



C/O ID Experts  
PO Box 4219  
Everett WA 98204

ENDORSE



CARE OF  
NAME  
ADDRESS1  
ADDRESS2  
CSZ  
COUNTRY

2Dcode  
SEQ

BREAK

To Enroll, Please Call:  
1-800-254-7328  
Or Visit:  
<https://ide.myidcare.com/huggins>  
Enrollment Code: <<XXXXXXXXXX>>

May 24, 2019

Subject: Notice of Data Breach

Dear <<First Name>> <<Last Name>>:

We are writing to inform you of a data security incident that may have affected your personal information. Huggins Insurance (“Huggins”) is an insurance broker through which you or your employer may have purchased insurance services. The privacy and security of your personal information is extremely important to Huggins. That is why we are writing to inform you about this incident, offer you complimentary credit monitoring and identity protection services, and provide you with information relating to steps that can be taken to help protect your information.

**What Happened?** On January 16, 2019, Huggins learned that an unauthorized individual had gained access to an employee’s email account. Upon discovering this information, Huggins immediately took steps to secure all employee email accounts and began an investigation. In doing so, Huggins engaged an independent forensics firm to determine what happened and whether personal information had been accessed or acquired without authorization. The forensics firm later informed Huggins that a second email account had been accessed without authorization. On April 3, 2019, the forensics firm informed Huggins that messages and attachments contained within the impacted email accounts included some of your information.

Huggins has no evidence to suggest that your personal information has been misused. Nonetheless, out of an abundance of caution, we are writing to inform you of the incident and to provide you with access to complimentary credit monitoring and identity protection services.

**What Information Was Involved?** The information impacted in connection with this incident may have included the following: names, Social Security numbers, driver’s license numbers, state identification card numbers, health insurance policy numbers, credit or debit card numbers, financial account numbers, and medical information.

**What Are We Doing?** As soon as Huggins discovered the incident, we took the steps described above. We are also providing you with information about steps that you can take to help protect your personal information. As an added precaution, we are offering you complimentary credit monitoring and identity protection services through ID Experts for one year. ID Experts is a global leader in risk mitigation and response and has extensive experience helping individuals who have sustained an unintentional exposure of personal information. We take the security of all information that we store in our systems very seriously and have taken steps to enhance the security of the Huggins digital environment and all personal information in our possession in order to prevent similar incidents from occurring in the future.

**What You Can Do:** You can follow the recommendations on the following page to protect your personal information. We recommend that you review your credit report and consider placing a security freeze on your credit file. You can also enroll in the free credit and identity monitoring services, known as MyIDCare, that are being offered for 12 months at no cost through ID Experts. You can also contact ID Experts with any questions and to enroll in free services by calling 1-800-254-7328 or going to <http://ide.myidcare.com/huggins> and using the enrollment code provided above. MyIDCare experts are available Monday through Friday from 5:00 a.m. to 5:00 p.m. Pacific. Please note the deadline to enroll is August 24, 2019. 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. Your services start on the date of this notice and can be used at any time during the next 12 months.

**For More Information:** Further information about how to protect your personal information appears on the following page. If you have questions or need assistance, please call ID Experts at 1-800-254-7328 from 5:00 a.m. until 5:00 p.m. Pacific Time, Monday Through Friday. Please have your enrollment code ready.

We take your trust in us and this matter very seriously and we deeply regret any worry or inconvenience that this may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read "Dawn Bostwick". The signature is fluid and cursive, with a horizontal line extending to the right.

Dawn Bostwick  
Account Manager & Partner  
Huggins Insurance

## STEPS YOU CAN TAKE TO FURTHER PROTECT YOUR INFORMATION

**Review Your Account Statements and Notify Law Enforcement of Suspicious Activity:** As a precautionary measure, we recommend that you remain vigilant and review your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You should also promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (the "FTC").

**Copy of Credit Report:** You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can also contact one of the following three national credit reporting agencies:

**Equifax**

P.O. Box 105851  
Atlanta, GA 30348  
1-800-525-6285  
[www.equifax.com](http://www.equifax.com)

**Experian**

P.O. Box 9532  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com](http://www.experian.com)

**TransUnion**

P.O. Box 1000  
Chester, PA 19016  
1-877-322-8228  
[www.transunion.com](http://www.transunion.com)

**Free Annual Report**

P.O. Box 105281  
Atlanta, GA 30348  
1-877-322-8228  
[www.annualcreditreport.com](http://www.annualcreditreport.com)

**Fraud Alert:** You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

**Security Freeze:** In some U.S. states, you have the right to put a security freeze on your credit file. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. There should be no fees associated with placing or removing a security freeze. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

**Additional Free Resources:** You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

**Federal Trade Commission**

600 Pennsylvania Ave, NW  
Washington, DC 20580  
[consumer.ftc.gov](http://consumer.ftc.gov), and  
[www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)  
1-877-438-4338

**You also have certain rights under the Fair Credit Reporting Act (FCRA):** These rights include knowing what is in your file; disputing incomplete or inaccurate information; and requiring consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>

