

[REDACTED]

From: Mirza, Sadia <Sadia.Mirza@troutman.com>
Sent: Friday, September 4, 2020 3:32 AM
To: DOJ: Consumer Protection Bureau <DOJ-CPB@doj.nh.gov>
Subject: Notice of Data Incident

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

To Whom It May Concern:

I am writing on behalf of my client, Interactive Data, LLC, located at 2650 N. Military Trail, Suite 300, Boca Raton, Florida 33431 ("IDI") regarding a recent data incident.

The incident potentially impacted two (2) New Hampshire residents. Notice of the incident will be sent to such residents via US mail on or about September 4, 2020 and a dedicated call center will be set up for consumers to call should they have any questions or concerns. A template copy of the notice is attached for reference. We will also be submitting notice of this incident via US mail to the Consumer Protection Bureau, Office of the Attorney General, located at 33 Capitol Street, Concord, NH 03301.

Incident

IDI provides informational products that contain personal data to financial institutions, insurance companies, law enforcement agencies, and other organizations for investigative, compliance and other purposes through IDI's online investigative product, idiCORE™. Prior to providing access to idiCORE, we diligently credential applicants, including by conducting third-party site visits of the applicant's business.

On July 29, 2020, we discovered that a credentialed idiCORE account may have been used improperly between July 23, 2020 and July 29, 2020. Once we learned of the suspected misuse, we immediately commenced an investigation and terminated the account. Through our efforts, we found that searches by this credentialed account may have included personal information belonging to certain individuals. While this incident may not constitute a "breach" within the meaning of the applicable statute, we are notifying you out of an abundance of caution.

Potentially Impacted Information

The information potentially involved included name, Social Security number and other information relating to individuals, such as possible current and former addresses, e-mail address, telephone number, date of birth, possible motor vehicle information, criminal history information, property

ownership information, bankruptcy information, lien information, judgment information, employment history information and information about possible relatives and associates.

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Remedial Steps

Upon learning of this incident, we immediately suspended the account in question and launched an investigation to determine the nature and scope of the incident. We then terminated the account entirely and have taken certain administrative and technical precautions to address the circumstances of this incident from occurring again. To help protect consumers' identity, IDI is providing consumers online credit monitoring services for a period of 24 months at no charge. Such services shall be provided by Equifax, one of the three nationwide credit reporting companies. A description of the credit monitoring service is included in the attached template notice.

Should you have any questions or concerns about this matter, please do not hesitate to contact me using the contact information provided below.

Sincerely,

Sadia Mirza

Sadia Mirza, CIPP/US, CIPM

Associate

troutman pepper

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Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Name 1>>

<<Name 2>>

<<Address 1>>

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<<Address 3>>

<<Address 4>>

<<Address 5>>

<<City>><<State>><<Zip>>

<<Date>>

<<Country>>

Re: Important Security Notification

Dear <<Name 1>>:

On behalf of Interactive Data, LLC, located at 2650 N. Military Trail, Suite 300, Boca Raton, Florida 33431 ("IDI"), we are writing to inform you about a recent incident which may have involved the potential exposure of some of your personal information.

WHAT HAPPENED?

IDI provides informational products that contain personal data to financial institutions, insurance companies, law enforcement agencies, and other organizations for investigative, compliance and other purposes through IDI's online investigative product, idiCORE™. Prior to providing access to idiCORE, we diligently credential applicants, including by conducting third-party site visits of the applicant's business.

On July 29, 2020, we discovered that a credentialed idiCORE account may have been used improperly between July 23, 2020 and July 29, 2020. Once we learned of the suspected misuse, we immediately commenced an investigation and terminated the account. Through our efforts, we found a search by this account which included personal information about you. It is for this reason that we are providing you notice.

WHAT INFORMATION WAS INVOLVED?

The information potentially involved may have included your name, Social Security number and other information, such as possible current and former addresses, e-mail address, telephone number, date of birth, possible motor vehicle information, criminal history information, property ownership information, bankruptcy information, lien information, judgment information, employment history information and information about possible relatives and associates.

WHAT ARE WE DOING?

Upon learning of this incident, we immediately suspended the account in question and launched an investigation to determine the nature and scope of the incident. We then terminated the account entirely and have taken certain administrative and technical precautions to address the circumstances of this incident from occurring again.

To help protect your identity, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (Equifax Credit Watch™ Gold with WebDetect) for two years provided by Equifax, of one of the three nationwide credit reporting companies. A description of this product is provided in the attached material, which also contains instructions about how to enroll (including your personal activation code). You must complete the enrollment process by December 31, 2020. We strongly recommend you consider enrolling in this product, at our expense, and review the additional material enclosed with this letter.

WHAT YOU CAN DO.

1. **Sign Up for Credit Monitoring.** We encourage you to take advantage of the complimentary credit monitoring services we are providing. As noted above, a description of the credit monitoring services is provided in the attached material.
2. **Monitor Account Statements and Free Credit Reports.** You should remain vigilant for incidents of financial fraud and identity theft by regularly reviewing your account statements and monitoring free credit reports.
3. **Contact the Federal Trade Commission, Law Enforcement and Credit Bureaus.** To report incidents of identity theft or to learn about steps you can take to protect yourself from identity theft, you may contact the Federal Trade Commission (“FTC”), your state’s Attorney General’s office, or law enforcement. To learn more, you can go to the FTC’s websites at www.IdentityTheft.gov and www.ftc.gov/idtheft; call the FTC at (877) IDTHEFT (438-4338); or write to: FTC Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

You may contact the nationwide credit reporting agencies at:

Equifax
(800) 525-6285
P.O. Box 740241
Atlanta, GA 30374-0241
www.equifax.com

Experian
(888) 397-3742
P.O. Box 9701
Allen, TX 75013
www.experian.com

TransUnion
(800) 916-8800
Fraud Victim Assistance
Division
P.O. Box 2000
Chester, PA 19022
www.transunion.com

4. **Obtain Free Copy of Credit Reports.** You may also periodically obtain credit reports from each nationwide credit reporting agency. If you discover information on your credit report arising from a fraudulent transaction, you should request that the credit reporting agency delete that information from your credit report file. In addition, under the Fair Credit Reporting Act (“FCRA”), you are entitled to one free copy of your credit report every 12 months from each of the three nationwide credit reporting agencies. You may obtain a free copy of your credit report by going to www.AnnualCreditReport.com or by calling (877) 322-8228.
5. **Additional Rights Under the FCRA.** You have rights pursuant to the FCRA, 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 FCRA, 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 violators. You may have additional rights under the FCRA not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant

to the FCRA. We encourage you to review your rights pursuant to the FCRA by visiting <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

6. Request Fraud Alerts and Security Freezes. You may obtain additional information from the FTC and the credit reporting agencies about fraud alerts and security freezes. You can add a fraud alert to your credit report file to help protect your credit information. A fraud alert can make it more difficult for someone to get credit in your name because it tells creditors to follow certain procedures to protect you, but it also may delay your ability to obtain credit. You may place a fraud alert in your file by calling just one of the three nationwide credit reporting agencies listed above. As soon as that agency processes your fraud alert, it will notify the other two agencies, which then must also place fraud alerts in your file.

In addition, you can contact the nationwide credit reporting agencies at the following numbers to place a security freeze at no cost to you:

Equifax	Experian	TransUnion
(800) 349-9960	(888) 397-3742	(888) 909-8872

Placing a security freeze prohibits the agency from releasing any information about your credit report without your written authorization. Security freezes must be placed separately at each of the three nationwide credit reporting agencies. When requesting a security freeze, you may need to provide the following information:

- Your full name, with middle initial as well as Jr., Sr., II, etc.
- Social Security number
- Date of birth
- Current address and all addresses for the past two years
- Proof of current address, such as a current utility bill or telephone bill
- Legible copy of a government-issued identification card, such as a state driver's license, state identification card, or military identification.

After receiving your request, each agency will send you a confirmation letter containing a unique PIN or password that you will need to lift or remove the freeze. You should keep the PIN or password in a safe place.

7. Additional Information for Certain States. Please review the last page of this letter for additional information for certain states.

FOR MORE INFORMATION

We regret any inconvenience or concern this incident may cause you. Please do not hesitate to contact our support agents if you have any questions or concerns by calling (888) 490-0455. Our support agents are available Monday through Friday, from 9:00 a.m. to 9:00 p.m. Eastern Time, excluding U.S. holidays.

Sincerely,



Derek Dubner
Chief Executive Officer

ADDITIONAL INFORMATION FOR CERTAIN STATES

For residents of Iowa: To report suspected incidents of identity theft, you may contact local law enforcement or the Iowa Attorney General's Office. You can contact the Iowa Attorney General at: Office of the Attorney General, 1305 E. Walnut Street, Des Moines, IA 50319, (515) 281-5164, <http://www.iowaattorneygeneral.gov/>.

For residents of Maryland: You may obtain information about avoiding identity theft from the FTC or the Maryland Attorney General's Office. These offices can be reached at:

Federal Trade Commission Consumer Response Center 600 Pennsylvania Avenue, NW Washington, DC 20580 (877) IDTHEFT (438-4338) http://www.ftc.gov/idtheft/	Office of the Attorney General Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202 (888) 743-0023 www.oag.state.md.us
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For residents of North Carolina: You may obtain information about preventing identity theft from the FTC or the North Carolina Attorney General's Office. These offices can be reached at:

Federal Trade Commission Consumer Response Center 600 Pennsylvania Avenue, NW Washington, DC 20580 (877) IDTHEFT (438-4338) www.consumer.gov/idtheft	North Carolina Department of Justice Attorney General Josh Stein 9001 Mail Service Center Raleigh, NC 27699-9001 (919) 716-6400 http://www.ncdoj.com
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For residents of New York: You may obtain security breach response information and identity theft and protection information from the FTC, the Department of State, Division of Consumer Protection, and the New York Attorney General's Office. These offices can be reached at:

Federal Trade Commission Consumer Response Center (877) IDTHEFT (438-4338) www.consumer.gov/idtheft	Department of State Division of Consumer Protection (800) 697-1220 https://www.dos.ny.gov/consumerprotection	Office of the Attorney General (800) 771-7755 https://ag.ny.gov/
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For residents of Oregon: You may report suspected identity theft to law enforcement, including You may report suspected identity theft to law enforcement, including the Oregon Attorney General and the FTC. These offices can be reached at:

Federal Trade Commission Consumer Response Center 600 Pennsylvania Avenue, NW Washington, DC 20580 (877) IDTHEFT (438-4338) http://www.ftc.gov/idtheft/	Oregon Department of Justice 1162 Court St. NE Salem, Oregon 97301 (877) 877-9392 https://www.doj.state.or.us/
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For residents of Rhode Island: You have the right to file or obtain a police report (should one be filed) and request a free security freeze, free of charge, as described above. Placing a security freeze may require that you provide certain personal information (e.g., name, Social Security number, date of birth, and address) and proper identification (such as a copy of a government-issued ID card and a bill or statement) prior to honoring your request for a security freeze. You may also contact the Attorney General's office at: Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, (401) 274-4400, <http://www.riag.ri.gov/>.



Activation Code: **INSERT Credit Monitoring Code**

About the Equifax Credit Watch™ Gold with WebDetect identity theft protection product

Equifax Credit Watch Gold with WebDetect will provide you with an “early warning system” to changes to your credit file. Note: You must be over age 18 with a credit file in order to take advantage of the product.

Equifax Credit Watch provides you with the following key features and benefits:

- Comprehensive credit file monitoring and automated alerts of key changes to your **Equifax** credit report
- Wireless alerts and customizable alerts available (available online only)
- Access to your Equifax Credit Report™
- Ability to receive alerts if your Social Security Number or credit card numbers are found on Internet trading sites via WebDetect¹
- Up to \$25,000 in identity theft insurance with \$0 deductible, at no additional cost to you²
- Live agent Customer Service 7 days a week from 8 a.m. to 3 a.m. to assist you in understanding the content of your Equifax credit information, to provide personalized identity theft victim assistance, and help initiate an investigation of inaccurate information
- 90-day Fraud Alert placement with automatic renewal functionality³ (available online only)

How to Enroll: To sign up online for **online delivery** go to: www.myservices.equifax.com/goldscan

1. **Welcome Page:** Enter the Activation Code provided at the top of this page in the “Activation Code” box and click the “Submit” button.
2. **Register:** Complete the form with your contact information (name, gender, home address, date of birth, Social Security Number and telephone number) and click the “Continue” button.
3. **Create Account:** Complete the form with your email address, create a Username and Password, check the box to accept the Terms of Use and click the “Continue” button.
4. **Verify ID:** The system will then ask you up to four security questions to verify your identity. Please answer the questions and click the “Submit Order” button.
5. **Order Confirmation:** This page shows you your completed enrollment. Please click the “View My Product” button to access the product features.

¹ WebDetect will scan for your Social Security number (if you choose to) and up to 10 major credit/debit card numbers you provide. WebDetect scans thousands of internet sites where consumers' personal information is suspected of being bought and sold and is constantly adding new sites to those it searches. However, the Internet addresses of these suspected internet trading sites are not published and frequently change, so there is no guarantee that WebDetect is able to locate and search every possible internet site where consumers' personal information is at risk of being traded.

² Identity Theft Insurance underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions. This product is not intended for minors (under 18 years of age).

³ The Automatic Fraud Alert feature made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.