



January 15, 2020

By Certified Mail Return Receipt Requested

Office of the New Hampshire Attorney General
Consumer Protection & Antitrust Bureau
33 Capitol Street
Concord, NH 03301

RECEIVED

JAN 24 2020

CONSUMER PROTECTION

Re: Legal Notice of Potential Information Security Incident

Dear Sir or Madam:

Legalinc Corporate Services Inc. ("Legalinc", "we", "us") was recently contacted by a security consultant claiming he had found a vulnerability in our database used to store customer business formation documents. It is possible that the security consultant used this vulnerability to gain access to a limited number of files, which contained personal information about our business clients' customers including first and last name, address, and Social Security number.

We took immediate steps to address this incident, including launching an internal investigation, remediating the vulnerability, and retaining an independent forensic investigation firm to assist in the investigation and response. We are also taking additional steps to strengthen and enhance the security of information in our care, including conducting a comprehensive review of information security policies and procedures to help prevent similar events.

We have reviewed the information at issue in this incident and notified relevant business clients that use Legalinc to provide business formation and corporate filing services for their individual customers. Our client, Rocket Lawyer Incorporated ("Rocket Lawyer"), is in the process of notifying its potentially affected individual customers. We understand that approximately five (5) New Hampshire residents related to Rocket Lawyer are being notified of this event. While we cannot confirm whether any specific personal information may have been acquired due to this event, and have no evidence that any information has been or will be misused, out of an abundance of caution, Rocket Lawyer is providing notice to potentially affected individuals.

Legalinc has helped to arrange for an offer of complimentary credit and identity monitoring services, and to identify steps individuals can take to help protect themselves from identity theft. A copy of a sample notice letter that we believe to be substantially similar to the letters being sent to the potentially affected residents of your state by Rocket Lawyer is included for your reference.

If you have any questions or need further information regarding this incident, please contact me at erik@legalinc.com.

Sincerely,

A handwritten signature in black ink, appearing to be "Erik Treutlein". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Erik Treutlein
President

[DATE]

[NAME]

[ADDRESS]

Dear [NAME]:

Notice of Data Breach

We are writing to let you know about a potential security incident involving personal information that you provided when you formed your business. [COMPANY] uses Legalinc Corporate Service Inc. (“Legalinc”) to provide business formation and registered agent services to our customers. While we cannot confirm what specific information of yours was actually affected (if any), out of an abundance of caution, we’d like to call your attention to some steps you can take to help protect yourself. We know that even the potential exposure of data can be troubling, and we are truly sorry for any concern this may cause.

What Happened

In December 2019, Legalinc was contacted by a security consultant that claimed he had found a vulnerability in the database used to store customer business formation documents. It is possible that the security consultant used this vulnerability to gain access to a limited number of files, which contained personal information about certain individuals.

What Information Was Involved

The information stored in Legalinc’s database varies by individual, but may include first and last name, address, government-issued ID, and Social Security number. **At this time, we are not aware of any fraud connected to this incident or to your information.**

What is Legalinc Doing

Legalinc took immediate steps to address this incident, including launching an internal investigation, remediating the vulnerability, and retaining an independent forensic investigation firm to assist in the investigation and response. Legalinc has also taken additional steps to strengthen and enhance the security of its database, including conducting a comprehensive review of information security policies and procedures to help prevent similar events.

To help you protect your identity, Legalinc is offering one year of complimentary identity protection services from a leading identity monitoring services company. These services help detect possible misuse of your personal information and provide identity protection support focused on immediate identification and resolution of identity theft. For more information about these services and how to complete the enrollment process, please refer to the enrollment instructions included with this letter.

What You Can Do

Although we are not aware of any misuse of information arising from this incident, here are precautionary steps you can take to help protect yourself:

- **Activate the Complimentary Identity Protection Services.** As outlined above, Legalinc is offering one year of identity theft protection and credit monitoring services at no charge to you. For more information about these services and instructions on completing the enrollment process, please refer to the “Information about Identity Theft Protection” reference guide attached to this letter. Please make sure you complete the enrollment process by **April 12, 2020** to receive these complimentary services.
- **Check Credit Reports and Financial Accounts.** You can carefully check your credit reports for accounts that you did not open or for inquiries from creditors you did not initiate. If you see something you don’t understand or aren’t familiar with, call the credit agency immediately. If you find any suspicious activity on your credit reports, contact the local police or sheriff’s office, and file a police report for identity theft and obtain a copy of it. You may need to give copies of the police report to creditors to clear up your records. You can also review your financial account statements to determine if there are any discrepancies or unusual activity listed. If you see anything you do not understand, you should call the financial institution immediately.
- **Consult the Identity Theft Protection Guide.** Finally, please review the “Information about Identity Theft Protection” reference guide, included here, which describes additional steps that you may wish to take to help protect yourself, including recommendations by the Federal Trade Commission regarding identity theft protection and details on placing a fraud alert or a security freeze on your credit file.

For More Information

For more information about this incident, or if you have additional questions or concerns, please call 833-991-1556 between the hours of 9 a.m. and 9 p.m. Eastern time, Monday through Friday (except major holiday), or email privacy@legalinc.com. Again, we sincerely regret that this incident occurred and deeply apologize for any concern it may cause.

Sincerely,

[COMPANY]

Information about Identity Theft Protection

To help protect your identity, Legalinc is offering a complimentary membership to Experian's® IdentityWorks®. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft. Included with this service are fraud resolution services that provide an Experian Fraud Resolution agent to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition). While this Fraud Resolution assistance is immediately available to you without any further action on your part, you can also activate the fraud detection tools available through enrolling in IdentityWorks® at no cost to you. To enroll in these services, visit: www.experianidworks.com/3bcredit by **April 12, 2020**, and use the following activation code: **[ACTIVATION CODE]**. You may also enroll over the phone by calling **877.288.8057** between the hours of 9:00 AM and 9:00 PM (Eastern Time), Monday through Friday and 11:00 AM and 8:00 PM Saturday (excluding holidays). Please provide the following engagement number as proof of eligibility: **[ENGAGEMENT NUMBER]**.

Once you enroll in IdentityWorks, you will have access to the following features:

- **Experian credit report at signup:** See what information is associated with your credit file.
- **Active Surveillance Alerts:** Monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Fraud Resolution:** Identity Theft Resolution agents are immediately available to help you address credit and non-credit related fraud.
- **ExtendCARE:** You receive the same high-level of Fraud Resolution support even after your IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance¹:** Provides coverage for certain costs and unauthorized electronic fund transfers

There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information.

Review Accounts and Credit Reports: You can regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed at the bottom of this page.

You should remain vigilant with respect to reviewing your account statements and credit reports, and you should promptly report any suspicious activity or suspected identity theft to the proper law enforcement authorities, including local law enforcement, your state's attorney general, and/or the Federal Trade Commission ("FTC"). You may contact the FTC or your state's regulatory authority to obtain additional information about avoiding and protection against identity theft: Federal Trade Commission, Consumer Response Center 600 Pennsylvania Avenue, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft.

¹ Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). 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.

For residents of Maryland: You may also obtain information about preventing and avoiding identity theft from the Maryland Office of the Attorney General: Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us.

For residents of New York: You may also obtain information about preventing and avoiding identity theft from the New York Attorney General's Office: Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov/internet/privacy-and-identity-theft>.

For residents of North Carolina: You may also obtain information about preventing and avoiding identity theft from North Carolina Attorney General's Office: North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, www.ncdoj.gov.

For residents of Rhode Island: You may also obtain information about preventing and avoiding identity theft from the Rhode Island Office of the Attorney General: Rhode Island Office of the Attorney General, Consumer Protection Unit, 150 South Main Street, Providence, RI 02903, 401-274-4400, <http://www.riag.ri.gov>.

Security Freezes and Fraud Alerts: You have a right to place a security freeze on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit.

A security freeze does not apply to a person or entity, or its affiliates, or collection agencies acting on behalf of the person or entity, with which you have an existing account that requests information in your credit report for the purposes of reviewing or collecting the account. Reviewing the account includes activities related to account maintenance, monitoring, credit line increases, and account upgrades and enhancements. Please contact the three major credit reporting companies as specified below to find out more information about placing a security freeze on your credit report.

As an alternative to a security freeze, you have the right to place an initial or extended fraud alert on your credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting 7 years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies at the addresses or toll-free numbers listed at the bottom of this page.

Additional Information for New Mexico Residents: The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. Here is a summary of your major rights under the FCRA:

- You have the right to be told if information in your file has been used against you;
- You have the right to receive a copy of your credit report and the right to ask for a credit score;
- You have the right to dispute incomplete or inaccurate information;
- You have the right to dispute inaccurate, incomplete, or unverifiable information;
- You have the right to have outdated negative information removed from your credit file;
- You have the right to limit access to your credit file;

- You have the right to limit “prescreened” offers of credit and insurance you get based on information in your credit report;
- You have the right to seek damages from violators; and
- You have the right to place a “security freeze” on your credit report.

New Mexico Consumers Have the Right to Obtain a Security Freeze or Submit a Declaration of Removal. You may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

The security freeze will prohibit a consumer reporting agency from releasing any information in your credit report without your express authorization or approval. The security freeze is designed to prevent credit, loans and services from being approved in your name without your consent. When you place a security freeze on your credit report, you will be provided with a personal identification number, password or similar device to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report to a specific party or parties or for a specific period of time after the freeze is in place. To remove the freeze or to provide authorization for the temporary release of your credit report, you must contact the consumer reporting agency and may need to provide the following:

- (1) the unique personal identification number, password or similar device provided by the consumer reporting agency;
- (2) proper identification to verify your identity; and
- (3) information regarding the third party or parties who are to receive the credit report or the period of time for which the credit report may be released to users of the credit report.

A consumer reporting agency that receives a request from a consumer to lift temporarily a freeze on a credit report shall comply with the request no later than three business days after receiving the request. As of September 1, 2008, a consumer reporting agency shall comply with the request within fifteen minutes of receiving the request by a secure electronic method or by telephone.

A security freeze does not apply in all circumstances, such as where you have an existing account relationship and a copy of your credit report is requested by your existing creditor or its agents for certain types of account review, collection, fraud control or similar activities; for use in setting or adjusting an insurance rate or claim or insurance underwriting; for certain governmental purposes; and for purposes of prescreening as defined in the federal Fair Credit Reporting Act.

If you are actively seeking a new credit, loan, utility, telephone or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze, either completely if you are shopping around or specifically for a certain creditor, with enough advance notice before you apply for new credit for the lifting to take effect. You should contact a consumer reporting agency and request it to lift the freeze at least three business days before applying. As of September 1, 2008, if you contact a consumer reporting agency by a secure electronic method or by telephone, the consumer reporting agency should lift the freeze within fifteen minutes. You have a right to bring a civil action against a consumer reporting agency that violates your rights under the Fair Credit Reporting and Identity Security Act.

For more information, including information about additional rights, you can visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>, <https://www.consumerfinance.gov/learnmore/>, or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

You can obtain more information about fraud alerts and credit freezes by contacting the FTC or one of the national credit reporting agencies listed below.

National Credit Reporting Agencies Contact Information

Equifax (www.equifax.com)

General Contact:

P.O. Box 740241
Atlanta, GA 30374
800-685-1111

Fraud Alerts:

P.O. Box 740256, Atlanta, GA 30374

Credit Freezes:

P.O. Box 105788, Atlanta, GA 30348

Experian (www.experian.com)

General Contact:

P.O. Box 2002
Allen, TX 75013
888-397-3742

Fraud Alerts and Security Freezes:

P.O. Box 9554, Allen, TX 75013

TransUnion (www.transunion.com)

General Contact, Fraud Alerts and Security Freezes:

P.O. Box 2000, Chester, PA 19022
888-909-8872