

ALSTON & BIRD

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RECEIVED

APR 01 2021

CONSUMER PROTECTION

Kimberly K. Peretti

Direct Dial: 202-239-3720

Email: kimberly.peretti@alston.com

March 31, 2021

CONFIDENTIAL
VIA OVERNIGHT DELIVERY

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

Re: Notice of Data Breach

To the Office of the New Hampshire Attorney General:

We are writing on behalf of our client, Liberty Mutual Group, Inc., to notify you of a series of data security events involving a fraudulent campaign to obtain personal information. A copy of the draft notifications that we are planning to send to approximately 81 New Hampshire residents by first class mail in accordance with notification requirements under state law is attached to this letter.

On January 21 and January 22, 2021, Liberty Mutual discovered unusual quoting activity on two of its auto-quoting websites, GetCertainly.com and LibertyMutual.com, respectively, as a result of unauthorized third parties attempting to fraudulently obtain driver's license numbers. As part of the activity, an unauthorized third party would enter a name and date of birth they had already obtained from another, unknown source, into the quoting websites. Once an individual's information was entered on the website, a third-party pre-fill service populated the GetCertainly.com website with an unmasked driver's license number and populated the LibertyMutual.com website with a masked driver's license number. Although the driver's license number was masked on the LibertyMutual.com website, the unauthorized party used software developer tools to unmask the driver's license number pulled from the pre-fill service. This pattern of activity occurred January 21, 2021 on GetCertainly.com, and between November 21, 2020 and January 22, 2021 on LibertyMutual.com. Once detected, the websites were immediately taken offline, and full driver's license numbers are no longer provided as part of the website quoting process.

Addresses needed to notify the owners of the driver's license numbers impacted by the above noted unauthorized activity were not immediately determinable, and Liberty Mutual is working quickly to identify and validate addresses for affected individuals in order to provide written

Alston & Bird LLP

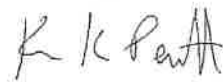
www.alston.com

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notification to New Hampshire residents whose driver's license numbers may have been involved. As a result, please note that the number of affected New Hampshire residents is approximate and subject to the address validation efforts that are underway. We will provide an update to this notice at the time that residents are notified. Liberty Mutual has arranged to provide free credit monitoring services for one year to the individuals whose driver's license number may have been involved.

If you have any questions regarding this incident or if you desire further information or assistance, please email me at Kimberly.Peretti@alston.com or call my direct line at (202) 239-3720.

Sincerely,

A handwritten signature in black ink, appearing to read "K K Peretti". The signature is written in a cursive, somewhat stylized font.

Kimberly K. Peretti

Enclosure

ALL CONSUMERS & CUSTOMERS - DRAFT

<Return Name>
<Return Address>
<City> <State> <Zip>



<FirstName> <LastName>
<Address1>
<Address2>
<City><State><Zip>

April XX, 2021

Re: Notice of Data Breach

Dear <FirstName> <LastName>:

We are writing to tell you that you could have been impacted by recent unauthorized access to your personal information.

What Happened?

We recently learned that an unauthorized third party used our public websites LibertyMutual.com and GetCertainly.com to submit fraudulent requests for auto insurance using names, addresses and/or dates of birth obtained from another, unknown source. On January 21, 2021 and January 22, 2021, we discovered an unusual pattern of activity on GetCertainly.com and LibertyMutual.com in which an unauthorized third party may have misused our online auto insurance quote application to access your driver's license number. Upon learning of this activity, we took immediate steps to prevent access to this personal information and worked to identify the potentially affected individuals. This activity occurred between November 21, 2020 and January 22, 2021.

What Information Was Involved?

Based on our investigation, it appears your driver's license number may have been exposed during this incident.

What We Are Doing?

As soon as we discovered this suspicious activity, we immediately removed the ability to view driver's license numbers during an online quote. We have reported this incident to the authorities and are assisting their investigation to prevent future fraudulent activity.

We are offering you **[INSERT NUMBER]** months of complimentary credit monitoring and identity theft protection services through Cyberscout, a company specializing in fraud assistance and remediation services. To activate these services, please follow the instructions included the attached *Additional Important Information*. We cannot enroll in the services for you, but are here to help if you have any questions.

What You Can Do.

We encourage you to carefully check your account statements and credit reports and to promptly report suspected identity theft. The complimentary credit monitoring services we are offering will help you identify fraudulent activity.

For More Information.

For information about additional steps you can take to protect against unauthorized use of your personal information including fraud alerts and security freezes, please see the enclosed *Additional Important Information*.

If you have further questions about this incident, please call 866-721-3783 toll-free from 8:00 AM to 5:00 PM Eastern Time, Monday through Friday. You may also write to us at Liberty Mutual Group, Inc., 175 Berkeley Street, Boston, MA 02116.

We take this matter and your privacy very seriously. We sincerely apologize for any inconvenience or concern that this incident may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim MacPhee".

Jim MacPhee
President & Chief Operating Officer, U.S. Retail Markets

Additional important information.

Enroll in Credit Monitoring

We are providing you through Cyberscout access to **Single Bureau Credit Monitoring/Single Bureau Credit Report/Single Bureau Credit Score/Cyber Monitoring** services at no charge. You will receive alerts when changes occur to your Experian credit file for [INSERT NUMBER] months from the date of enrollment. If any fraud results in a financial loss, you will have access to a \$1,000,000 insurance reimbursement policy through Cyberscout. Any change to your account will be sent to you the same day that the change or update takes place with the credit bureau. Cyber monitoring will look out for your personal data on the dark web and alert you if your personal information is found online. You will also be alerted to any potentially fraudulent unemployment claims.

To enroll in Credit Monitoring services at no charge, please log on to **<https://secure.identityforce.com/benefit/liberty>** and follow the instructions. When prompted, please provide this unique code to receive services: **<CODE HERE.>** To receive the monitoring services, **you must enroll within 90 days** from the date of this letter.

The enrollment requires an internet connection and an email account, and services may not be available to minors under the age of 18 years of age. When signing up for monitoring services, you may be asked to verify personal information for our own protection to confirm your identity.

Free Credit Reports

Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. We recommend periodically obtaining credit reports from each nationwide credit reporting agency. 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 listed below directly to request a free copy of your credit report. When you get your credit report, review it carefully. Look for accounts you did not open. Look in the "inquiries" section for names of creditors from whom you have not requested credit. Some companies bill under names other than their store or commercial names; the credit bureau will be able to tell if this is the case. Look in the "personal information" section for any inaccuracies in information (such as home address and Social Security number).

If you see anything you do not understand, call the credit bureau at the telephone number on the report. Errors may be a warning sign of possible identity theft. You should notify the credit bureaus of any inaccuracies in your report, whether due to error or fraud, as soon as possible so the information can be investigated and corrected. If there are accounts or charges you did not authorize, immediately notify the appropriate credit bureau by telephone and in writing. Information that cannot be explained should also be reported to your local police or sheriff's office because it may signal criminal activity.

Security Freezes

You have the right to place a "security freeze" on your credit report. This 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, 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 future requests or applications you make for a new loan, credit, mortgage, or any other account involving credit. By federal law, you cannot be charged to place or lift a security freeze on your credit report. If you want to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian

P.O. Box 9554
Allen, TX 75013
1-888-397-3742

www.experian.com/freeze/center.html

TransUnion

P.O. Box 160
Woodlyn, PA 19094
1-888-909-8872

www.transunion.com/credit-freeze

Equifax

P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111

www.equifax.com/personal/credit-report-services

To request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, the addresses where you have lived over the prior five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, etc.);
7. If you are a victim of identity theft, a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

Fraud Alerts

As an alternative to a security freeze, you have the right to place an initial or extended "fraud alert" on your file at no cost. An initial fraud alert is a 1-year alert that is placed on your credit file. When a fraud alert appears on your credit file, a business is required to take steps to verify your 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 seven years. If you want to place a fraud alert, please contact any one of the agencies listed below:

Experian

P.O. Box 9554
Allen, TX 75013
1-888-397-3742

www.experian.com/fraud/center.html

TransUnion

P.O. Box 2000
Chester, PA 19016
1-800-680-7289

www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax

P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008

www.equifax.com/personal/credit-report-services

You can also learn about identity theft prevention, fraud alerts, security freezes, and steps you can take to protect yourself by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

Contact the Federal Trade Commission and Law Enforcement

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 also encourages those whose information has been misused to file a complaint with them. You can find information on how to file a complaint using the contact information listed above.

You have the right to file a police report if you ever experience identity theft or fraud. To file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For Residents of the District of Columbia

You may contact the D.C. Attorney General's Office to obtain information about steps to take to avoid identity theft:

D.C. Attorney General's Office, Office of Consumer Protection, 400 6th Street, NW, Washington DC 20001, 1-202-442-9828, www.oag.dc.gov.

For Residents of Iowa

You may contact law enforcement or the Iowa Attorney General's office to report suspected incidents of identity theft. The Iowa Attorney General's Office can be reached at:

Iowa Attorney General's Office, Director of Consumer Protection Division, 1305 E. Walnut Street, Des Moines, IA 50319, 1-515-281-5926, www.iowaattorneygeneral.gov

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, <http://www.marylandattorneygeneral.gov/>.

For Residents of New Mexico

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 provide all of 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;
- (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; and

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 pre-screening 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 Residents of New York

You may also obtain information about security breach response and identity theft prevention and protection from the New York Attorney General's Office:

Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, www.ag.ny.gov.

For Residents of North Carolina

You may also obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office:

North Carolina Attorney General's Office, Consumer Protection Division
9001 Mail Service Center, Raleigh, NC 27699-9001, 1-919-716-6000, www.ncdoj.gov

For Residents of Oregon

State laws advise you to report any suspected identity theft to law enforcement, as well as the Federal Trade Commission. Contact information for the Oregon Department of Justice is as follows:

Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301, 1-877-877-9392, www.doj.state.or.us

STATE OF NH
DEPT OF JUSTICE
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