

BakerHostetler

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MAR 26 2018

CONSUMER PROTECTION

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March 23, 2018

VIA OVERNIGHT MAIL

Attorney General Joseph Foster
Office of the Attorney General
33 Capitol St.
Concord, NH 03301

Re: Incident Notification

Dear Attorney General Foster:

I am writing on behalf of our client, the NFP Property & Casualty Services, Inc. (“NFP”) and its subsidiaries,¹ to notify you of a security incident involving three (3) New Hampshire residents.

On March 13, 2018, NFP learned that an employee received a phishing email that same day that was designed to appear as if it came from a company executive. The employee believed the email to be legitimate and on that same day replied to the message and attached certain employees’ 2017 IRS Form W-2s, which included the name, address, earnings information, and Social Security number of certain employees and former employees of NFP and its subsidiaries. No consumer/client information was disclosed with this incident.

On March 23, 2018, NFP will begin mailing written notifications to potentially affected individuals, including three (3) New Hampshire residents who are being notified of the incident in writing in accordance with N.H. Rev. Stat. Ann. § 359-C:20 in substantially the same form as the enclosed letter. NFP also provided preliminary email notification to potentially impacted individuals for whom it had an email address on March 14, 2018.

NFP is offering the potentially affected individuals a complimentary three-year membership in credit monitoring and identity theft protection services from Experian’s® IdentityWorksSM Credit 3B. NFP is reimbursing employees for any costs associated with

¹ NFP acquired the following companies, which had employees or former employees impacted by this incident: City Securities, Inc.; Hole In One USA; and International Insurance Group, Inc.

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Denver
Houston Los Angeles New York Orlando Philadelphia Seattle Washington, DC

Attorney General Joseph Foster

March 23, 2018

Page 2

instituting, temporarily lifting, or removing a credit freeze. NFP is also providing a telephone number for potentially affected individuals to call with any questions they may have.

To help prevent something like this from happening again, NFP will make appropriate changes to its systems and processes, and will provide additional education and training for its employees.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,



Patrick H. Haggerty

Partner

Enclosure



Return Mail Processing Center
PO Box 6336
Portland, OR 97228-6336

<<Mail ID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
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<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

Dear <<Name 1>>:

NFP Property & Casualty Services, Inc. and its subsidiaries are committed to maintaining the privacy and security of our employees' personal information. We are writing to inform you of an incident that involved some of your personal information. This letter describes the incident, some measures we have and will be taking, and some steps you can take.

On March 13, 2018, we learned that one of our employees received a phishing email that same day that was designed to appear as if it came from a company executive. Believing the email to be legitimate, the employee replied to the message and attached certain employees' 2017 IRS Form W-2s, which included your name, address, earnings information, and Social Security number.

We recognize this issue can be frustrating and we are taking steps to help protect you. We are offering you a complimentary three-year membership of Experian's® IdentityWorksSM. This product helps detect possible misuse of your personal information and provides you with identity protection support focused on immediate identification and resolution of identity theft. IdentityWorksSM is completely free and enrolling in this program will not hurt your credit score. Unfortunately, due to privacy laws we cannot enroll you in the product. **For more information on IdentityWorksSM, including instructions on how to activate your complimentary three-year membership, please see below. Identity Restoration assistance is immediately available to you.**

- **Enroll by:** <<Enrollment Deadline>> (Your code will not work after this date)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- **Provide** your activation code: <<code>>. This code is unique and personal, please do not forward on.

To help prevent something like this from happening again, we are reviewing the incident and will make appropriate changes to our systems or processes, including additional educational and training for our employees. We also notified law enforcement, the IRS and state taxing authorities of the incident. The IRS has indicated that they will monitor affected employees' returns for the purposes of attempting to prevent fraudulent tax refunds from being paid out.

We have attached FAQs for your reference and encourage you to review them. The FAQs include information on additional steps you can take as a result of this incident, including guidance on addressing tax-related identity theft and implementing a credit freeze. We will reimburse employees for any costs associated with instituting, temporarily lifting, or removing a credit freeze. If you are considering implementing a security freeze, please sign up for the Experian's® IdentityWorksSM first to avoid any disruption with that service.

We deeply regret any concern or inconvenience this matter may cause you. The following NFP representatives are available should you have questions or wish to further discuss this incident:

- **David Horn** (Chief Privacy Officer/Legal, 512-697-6508) (dhorn@nfp.com)
- **Mark Grosvenor** (Technology, 512-697-6650) (mgrosvenor@nfp.com)
- **Mary Steed** (Human Resources, 512-697-6910) (msted@nfp.com)

We have also set up a call center which may be reached at 855-372-0947, Monday through Friday, from 9:00 a.m. to 9:00 p.m. Eastern Time.

Sincerely,

A handwritten signature in black ink, appearing to read "Ed O'Malley". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Ed O'Malley
EVP, Head of Insurance Brokerage and Consulting

ADDITIONAL DETAILS REGARDING YOUR 36-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

- **Enroll by:** <<Enrollment Deadline>> (Your code will not work after this date)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- **Provide** your activation code: <<Code>>

If you have questions about the product, need assistance with identity restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-288-8057. Be prepared to provide engagement number <<Engagement Number>> as proof of eligibility for the identity restoration services by Experian.

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

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

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

**Activate your membership today at <https://www.experianidworks.com/3bcredit>
or call 877-288-8057 to register with the activation code above.**

What you can do to protect your information: 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.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** 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.

MORE INFORMATION ON WAYS TO PROTECT YOURSELF

Even if you choose not to take advantage of this free credit monitoring, we recommend that you remain vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
Experian, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
TransUnion, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

If you are a resident of Connecticut, Maryland, or North Carolina, you may contact and obtain information from your state attorney general at:

Connecticut Attorney General's Office, 55 Elm Street, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag

Maryland Attorney General's Office, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us, 1-888-743-0023 (toll free when calling within Maryland)
(410) 576-6300 (for calls originating outside Maryland)

North Carolina Attorney General, 9001 Mail Service Center, Raleigh, NC 27699, www.ncdoj.gov, 1-919-716-6400 or toll free at 1-877-566-7226

Fraud Alerts: There are two types of fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least 90 days. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies.

Credit Freezes: You may have the right to put a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. In addition, you may incur fees to place, lift and/or remove a credit freeze. Credit freeze laws vary from state to state. The cost of placing, temporarily lifting, and removing a credit freeze also varies by state, generally \$5 to \$20 per action at each credit reporting company. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information.

To place a security freeze on your credit report, you must send a written request to each of the three major reporting agencies by regular, certified, or overnight mail at the addresses below:

Equifax Security Freeze, PO Box 105788, Atlanta, GA 30348, www.equifax.com
Experian Security Freeze, PO Box 9554, Allen, TX 75013, www.experian.com
TransUnion Security Freeze, PO Box 2000, Chester, PA 19016, www.transunion.com

In order 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, provide 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, include a copy of the police report, investigative report, or complaint to a law enforcement agency concerning identity theft

The credit reporting agencies have three (3) business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with a unique personal identification number ("PIN") or password or both that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, you must call or send a written request to the credit reporting agencies by mail and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze as well as the identity of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have three (3) business days after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must send a written request to each of the three credit bureaus by mail and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have three (3) business days after receiving your request to remove the security freeze.

Fair Credit Reporting Act: You also have rights under the federal Fair Credit Reporting Act, which promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. The FTC has published a list of the primary rights created by the FCRA (<https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>), and that article refers individuals seeking more information to visit www.ftc.gov/credit. The FTC's list of FCRA rights includes:

- You have the right to receive a copy of your credit report. The copy of your report must contain all the information in your file at the time of your request.
- Each of the nationwide credit reporting companies – Equifax, Experian, and TransUnion – is required to provide you with a free copy of your credit report, at your request, once every 12 months.
- You are also entitled to a free report if a company takes adverse action against you, like denying your application for credit, insurance, or employment, and you ask for your report within 60 days of receiving notice of the action. The notice will give you the name, address, and phone number of the credit reporting company. You're also entitled to one free report a year if you're unemployed and plan to look for a job within 60 days; if you're on welfare; or if your report is inaccurate because of fraud, including identity theft.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- 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. And you must give your consent for reports to be provided to employers.
- You may limit "prescreened" offers of credit and insurance you get based on information in your credit report.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.