MULLEN COUGHLIN LLC
ATTORNEYS AT LAW

Jeffrey J. Boogay
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426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

August 12, 2020

VIA U.S. MAIL

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

Re: Notice of Data Event

Dear Sir or Madam:

We represent Patriot Growth Insurance Services, LLC ("Patriot") located at 501 Office Center Drive, Suite 215, Ft. Washington, PA 19034 and are writing to notify your office of an incident that may affect the security of some personal information relating to one (1) New Hampshire resident. The investigation into this matter is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Patriot does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

Patriot is an insurance services firm that acquired Voluntary Benefit Specialists, LLC ("VBS") in January of 2019. VBS is a voluntary employee benefits consulting and brokerage firm for employers. In connection with providing these services, VBS receives certain personal information from employers in order to enroll employees in voluntary benefit plans being offered by the employer.

On January 7, 2020, VBS discovered suspicious activity in a VBS employee's email account. VBS immediately took steps to secure the employee's email account and launched an investigation. This investigation included working with a third-party forensic investigator to determine the nature and scope of the activity. On January 17, 2020, VBS' investigation determined that two (2) VBS employee email accounts had their account credentials used be an unknown actor(s) to gain

unauthorized access to each of the accounts. Although the investigation confirmed the unauthorized actor(s) gained access on separate occasions to one account between December 23, 2019 and January 13, 2020 and the second account between January 6, 2020 and January 7, 2020, VBS cannot rule out the possibility of the unauthorized actor(s) gaining access to any specific email or attachment in the affected accounts.

With the assistance of third-party forensics, on March 4, 2020, VBS completed a programmatic and manual review of the contents of the email accounts to determine the types of protected information contained in the emails and to which individuals the information relates, and immediately launched a review of its files to ascertain address information for the clients of the impacted individuals. The information that could have been subject to unauthorized access includes name, date of birth, Social Security number, medical information and/or insurance information. On or about May 26, 2020, VBS notified each impacted client of this incident and is providing notice to impacted individuals on its clients' behalf.

Notice to New Hampshire Resident

On or about August 12, 2020, VBS began providing written notice of this incident to affected individuals, which includes one (1) New Hampshire resident. Written notice is being provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon discovering the event, Patriot and VBS moved quickly to investigate and respond to the incident including resetting the affected email account passwords, assessing the security of VBS' systems, and notifying potentially affected clients and individuals. Patriot is also working to implement additional safeguards and training to its employees, including VBS employees.

While Patriot and VBS are not aware of any attempted or actual misuse of personal information, it is providing impacted individuals with access to credit monitoring and identity restoration services for twelve (12) months, through TransUnion, at no cost to these individuals.

Additionally, VBS is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4784.

Very truly yours,

Jeffrey J. Boogay of
MULLEN COUGHLIN LLC

JJB/ara

EXHIBIT A

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

<<MailID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

Dear <<Name 1>>:

Voluntary Benefit Specialists, LLC ("VBS") is writing to inform you of a recent event that may impact the security of some of your personal information. VBS received your information to assist <<Data Elements>> in the enrollment in a <<Data Elements>> voluntary benefits plan. While we are unaware of any actual or attempted misuse of your personal information, we are providing you with information about the incident, our response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

What Happened? On January 7, 2020 VBS discovered suspicious activity in a VBS employee's email account. We immediately took steps to secure the employee's email account and launched an investigation which included working with a third-party forensic investigator to determine the nature and scope of the activity. On January 17, 2020, the investigation determined that two (2) VBS employee email accounts had their account credentials being used by an unknown actor(s) to gain unauthorized access to each account. The investigation confirmed the unauthorized actor(s) gained access on separate occasions to one account between December 23, 2019 and January 13, 2020 and the second account between January 6, 2020 and January 7, 2020. During this limited timeframe, the unauthorized actor may have had access to certain emails and attachments within the accounts.

What Information Was Involved? On March 4, 2020, with the assistance of third-party forensics, VBS completed a programmatic and manual review of the contents of the email accounts to determine the types of protected information contained in the emails and to which individuals the information relates, and immediately launched a review of its files to ascertain address information for the impacted individuals. Our review confirmed that the following types of information were in the emails account and may have been accessible to the unauthorized actor: name, date of birth, Social Security number, medical information and/or insurance information. **To date, VBS has not received any reports of actual or attempted misuse of your information.**

What We Are Doing. The confidentiality, privacy, and security of information in our care is one of our highest priorities and we take this incident very seriously. When we discovered this incident, we immediately reset the account password and took steps to determine what personal data was at risk. We also confirmed the security of our employee email accounts and related systems. As part of our ongoing commitment to the security of personal information in our care, we are working to review our existing policies and procedures, to implement additional safeguards, and to provide additional training to our employees on data privacy and security. We notified your employer regarding this incident and we also will be notifying state regulators, as required.

As an added precaution, we are also offering you complimentary access to twelve (12) months of credit and identity monitoring, fraud consultation and identity theft restoration services through TransUnion. We encourage you to enroll in these services, as we are not able to act on your behalf to enroll you. Please review the instructions contained in the attached *Steps You Can Take to Protect Your Information* for additional information on these services.

What You Can Do. You may review the enclosed *Steps You Can Take to Protect Your Information*, which contains information on what you can do to better protect against the possibility of identity theft and fraud, should you feel it is appropriate to do so. You may also enroll to receive the free credit and identity monitoring services we are offering.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call VBS at our dedicated assistance line at 877-202-9095 between the hours of 6am to 6pm Pacific Time Monday through Friday. You may also write to VBS at 289 Farris Ave, Suite B, Las Vegas, Nevada 89183.

We sincerely regret any inconvenience or concern this incident has caused.

Sincerely,

Michael D Perna
President
Voluntary Benefit Specialists, LLC

STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

Enroll in Credit and Identity Monitoring

Activation Code: <<Activation Code>>

Complimentary One-Year *my*TrueIdentity Credit Monitoring Service

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*my*TrueIdentity) for one year provided by TransUnion Interactive, a subsidiary of TransUnion,® one of the three nationwide credit reporting companies.

How to Enroll: You can sign up online or via U.S. mail delivery

- To enroll in this service, go to the *my*TrueIdentity website at **www.MyTrueIdentity.com** and, in the space referenced as "Enter Activation Code," enter the 12-letter Activation Code **<<Activation Code>>** and follow the three steps to receive your credit monitoring service online within minutes.
- If you do not have access to the Internet and wish to enroll in a similar offline, paper-based credit monitoring service, via U.S. mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the six-digit telephone passcode **<<Pass Code>>** and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and **<<Deadline>>**. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH COMPLIMENTARY CREDIT MONITORING SERVICE:

- Once you are enrolled, you will be able to obtain one year of unlimited access to your TransUnion credit report and credit score.
- The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, changes of address, and more.
- The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised and up to $1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

Monitor Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. 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 directly to request a free copy of your credit report.

You have the 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. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report.

Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian	**TransUnion**	**Equifax**
P.O. Box 9554	P.O. Box 160	P.O. Box 105788
Allen, TX 75013	Woodlyn, PA 19094	Atlanta, GA 30348-5788
1-888-397-3742	1-888-909-8872	1-800-685-1111
www.experian.com/freeze/center.html	www.transunion.com/credit-freeze	www.equifax.com/personal/credit-report-services

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 either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

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 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 seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Experian	**TransUnion**	**Equifax**
P.O. Box 9554	P.O. Box 2000	P.O. Box 105069
Allen, TX 75013	Chester, PA 19016	Atlanta, GA 30348
1-888-397-3742	1-800-680-7289	1-888-766-0008
www.experian.com/fraud/center.html	www.transunion.com/fraud-victim-resource/place-fraud-alert	www.equifax.com/personal/credit-report-services

Additional Information

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

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); TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order 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 Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-410-528-8662, www.oag.state.md.us.

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6000, www.ncdoj.gov. You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

For New York residents, the Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; https://ag.ny.gov/.

VBS

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

<<MailID>>
<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

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www.experian.com/freeze/center.html	www.transunion.com/credit-freeze	www.equifax.com/personal/credit-report-services

As the information that may have been affected includes medical information and/or insurance information, you should contact your healthcare provider if you do not receive bills within a normal period of time in case someone has changed your billing address. You should also review the Explanation of Benefits forms you receive from your insurance company to check for irregularities. Additionally, you can contact your insurance company to notify them of possible medical identity theft or to request a new account number.

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.);
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For New York residents, the Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; https://ag.ny.gov/.