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RECEIVED

FEB 22 2022

CONSUMER PROTECTION

February 17, 2022

**VIA US MAIL**

Department of Justice  
Office of Attorney General  
33 Capitol Street  
Concord, NH 03301

Re: Notice of Data Incident

Dear Sir or Madam:

We represent Pekin Insurance ("Pekin"), a licensed provider of personal and business insurance. Pekin is located at 2505 Court Street, Pekin, IL 61558. We are writing to notify you on behalf of our clients of a data security incident that occurred at Pekin and potentially affected the personal information of residents of New Hampshire. This notice may be supplemented upon any further investigation. By providing this notice, Pekin does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the relevant state statute, or personal jurisdiction.

**Background:** Our clients first became aware of a potential data incident involving potential unauthorized access to a system Pekin's network on January 6, 2022. After investigation, Pekin Insurance determined that an unauthorized access was obtained through a compromise of an independent insurance agent's office and user credentials, including the login ID and password to the Pekin Insurance agent website. The unauthorized third party used the stolen login information to view driver information hosted on a third-party underwriting service. Review of system logs revealed that the logon activity to the application used started on December 4, 2021, and continued through January 6, 2022, when Pekin discovered and terminated access. On January 21, 2022, after a final review of the system logs and information, Pekin discovered that New Hampshire residents were affected. The personal information at issue for New Hampshire residents includes some combination of name, address, driver's license number, and/or date of birth.

In response to the breach, our clients have instituted a number of remedial measures, including partial masking of driver's license information and enhanced user authorization and verification measures. Additional security measures will be implemented including data masking, application monitoring, and risk-based two-factor authentication.

**Notice to New Hampshire Residents:** We have determined that the number of New Hampshire residents potentially affected by this security incident is five (5). Pekin will begin mailing notice to impacted individuals subsequent to the transmittal of this letter, no later than

February 18, 2022. Written notice to individuals is being provided in substantially the same form as the letter attached here. Please note that we reserve the right to update the draft letter.

**Other Steps Taken and To Be Taken:** Pekin is taking action to provide assistance to potentially affected individuals, even though it currently has no evidence of any misuse of or fraudulent activity relating to anyone's personal information as a result of this incident. Our clients are providing individuals whose personal information was potentially affected by this incident with access to credit monitoring services for 12 months through Sontiq at no cost to the individuals.

Additionally, Pekin is providing impacted individuals with identity theft protection and guidance on how to better protect against identity theft and fraud. These measures include advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Our clients are also providing individuals with information on how to place a fraud alert and security freeze on their credit file, information on protecting against fraud, 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 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 incident, please contact us at (312) 460-5608 or [jpriebe@seyfarth.com](mailto:jpriebe@seyfarth.com).

Very truly yours,

SEYFARTH SHAW LLP

Jason Priebe

JP:Typist Initials

Pekin Insurance  
P.O. Box 3923  
Syracuse, NY 13220



February 18, 2022

### Notice of Data Breach

Dear :

We are writing to provide you with information about a recent data incident involving Pekin Insurance (2505 Court Street, Pekin, IL 61558) that exposed some of your personally identifiable information. While we have no evidence that any of your personal information was compromised or misused in any manner, we are taking appropriate precautionary measures to address this incident and help alleviate concerns you may have.

#### What Happened?

An unauthorized party obtained login information belonging to an independent insurance agent, including the login ID and password to the Pekin Insurance agent website. The unauthorized third party used the stolen login information to view driver information hosted on an authorized third-party tool used by Pekin Insurance. This activity took place starting on December 4, 2021, and continued through January 6, 2022, when we discovered and terminated the unauthorized access. During our ongoing investigation of the incident, on January 21, 2022, we discovered that your personal information was potentially accessed by an unauthorized computer process.

#### What Information Was Involved?

We have conducted a thorough investigation to determine the personal information and individuals impacted. The exposed information for individuals included personally identifiable information (PII) with some combination of your name, address, driver's license number, and/or date of birth.

#### What We Are Doing?

We regret that this incident occurred and take the security of our information very seriously. Pekin Insurance has taken immediate steps to remove access from the unauthorized party and have contacted the independent agent office to change their login information to the Pekin agent website. Pekin Insurance is also implementing additional security safeguards such as data encryption and two-factor authentication.

We continue to monitor our system and login activity since our corrective actions have been implemented. We are also very aware of the concern an incident such as this can create. We are committed to helping those people who may have been impacted by this incident.

In response to the incident, we are providing you with free access to the following services:

Representatives are available for 90 days from the date of this letter, to assist you with questions regarding this incident, between the hours of 8:00 am to 8:00 pm Eastern time, Monday through Friday, except holidays. Please call the help line 1-800-351-0128 and supply the fraud specialist with your unique code listed below. To extend these services, enrollment in the monitoring services described below is required.

\* Services marked with an "\*" require an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

Additionally, we are providing you with access to **Single Bureau Credit Monitoring\*** services at no charge. These services provide you with alerts for twelve months from the date of enrollment when changes occur to your credit file. This notification is sent to you the same day that the change or update takes place with the bureau. In addition, we are providing you with proactive fraud assistance to help with any questions that you might have or in the event you become a victim of identity theft. These services will be provided by Cyberscout, a company specializing in fraud assistance and remediation services.

**How do I enroll for the free services?**

To enroll in Credit Monitoring\* services at no charge, please log on to <https://www.myidmanager.com> and follow the instructions provided. When prompted please provide the following unique code to receive services: **kzouary2ape** For you to receive the monitoring services described above, you must enroll within 90 days from the date of this letter.

**What You Can Do**

Supplemental information is attached to this letter, including the Steps You Can Take to Protect Your Information as guidance on further protecting your personal data. You can also obtain information about fraud alerts and security freezes from the FTC and the credit reporting agencies listed below:

<b>Experian (1-888-397-3742)</b> P.O. Box 4500 Allen, TX 75013 <a href="http://www.experian.com">www.experian.com</a>	<b>Equifax (1-800-525-6285)</b> P.O. Box 740241 Atlanta, GA 30374 <a href="http://www.equifax.com">www.equifax.com</a>	<b>TransUnion (1-800-680-7289)</b> P.O. Box 2000 Chester, PA 19016 <a href="http://www.transunion.com">www.transunion.com</a>
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**Should you wish to obtain a credit report and monitor it on your own:**

- **You may obtain free copies of your credit report and monitor them upon receipt for any suspicious activity. You can obtain your free copies by going to the following website: [www.annualcreditreport.com](http://www.annualcreditreport.com) or by calling them toll-free at 1-877-322-8228. (Hearing impaired consumers can access their TDD service at 1-877-730-4204.**
- **Upon receipt of your credit report, we recommend that you review it carefully for any suspicious activity.**

You can also obtain more information from the Federal Trade Commission (FTC) about identity theft and ways to protect yourself. The FTC has an identity theft hotline: 877-438-4338; TTY: 1-866-653-4261; 600 Pennsylvania Avenue, NW, Washington, DC 20580. They also provide information on-line at [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft).

At Pekin Insurance, we take our responsibilities to protect your personal information very seriously. We apologize for any inconvenience.

Sincerely,



RON MITCHELL  
Vice President – Chief Underwriting Officer  
Pekin Insurance Company

\* Services marked with an “\*” require an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

## Steps You Can Take to Protect Your Information

### *Review Your Account Statements and Notify Law Enforcement of Suspicious Activity*

As a precautionary measure, we recommend that you remain vigilant by closely reviewing your account statements and credit reports. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained.

Additionally, you should report any fraudulent activity or suspected incidence of identity theft to proper law enforcement authorities, including local law enforcement to file a police report, the Attorney General, or the FTC. To file a complaint with the FTC, go to [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft) or call 1-877-ID-THEFT (877-438-4338). Complaints filed with the FTC will be added to the FTC's Identity Theft Data Clearinghouse, which is a database made available to law enforcement agencies.

### *Copy of Credit Report*

You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com> or calling 877-322-8228. Or you can elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies is provided below.

### *Fraud Alert*

You may also consider placing a fraud alert on your credit report. An initial fraud alert is free and will remain on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies using the information below:

Equifax  
1-800-525-6285  
[www.equifax.com](http://www.equifax.com)  
P.O. Box 740241  
Atlanta, GA 30374

Experian  
(888) 397-3742  
[www.experian.com](http://www.experian.com)  
P.O. Box 9532  
Allen, TX 75013

TransUnion  
(800) 680-7289  
[www.transunion.com](http://www.transunion.com)  
P.O. Box 2000  
Chester, PA 19022

### *Additional Free Resources on Identity Theft*

A copy of *Take Charge: Fighting Back Against Identity Theft*, a comprehensive guide from the FTC to help you guard against and deal with identity theft, can be found on the FTC's website at <http://www.ftc.gov/bcp/edu/pubs/consumer/idtheft/idtheft04.shtm>.

\* Services marked with an "\*" require an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.