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ATTORNEYS AT LAW

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CONSUMER PROTECTION

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1275 Drummers Lane, Suite 302  
Wayne, PA 19087

February 25, 2020

**VIA FIRST-CLASS 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 Relation Insurance, Inc. d/b/a Relation Insurance Services of Georgia, ("Relation") located at 5825 Medlock Bridge Parkway, Suite 100, Johns Creek, Georgia, 30022, and are writing to notify your office of an incident that may affect the security of some personal information relating to approximately two (2) New Hampshire residents. This notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Relation 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**

Relation provides insurance broker services to its business partners. On August 15, 2019, Relation became aware of unusual activity in an employee's email account. Relation immediately secured the employee's email account and launched an investigation, with the assistance of a third-party computer forensics expert, to determine what may have happened and what information may have been affected. Relation's investigation determined that an unknown individual had access to the email account between August 14th and August 15th of 2019. Relation then undertook a comprehensive review of emails that were present in the account at the time of the incident to identify what personal information was stored within the emails and to whom that information relates. On October 16, 2019, Relation confirmed personal information was present in the email account and began review its files to determine which business partners were associated with this information. On December 13, 2019, Relation provided notice of this incident to its business partners. Relation then worked with its business partners to determine notice obligations. Due to the nature of the data within the email account, a large majority of the records did not contain easily identifiable contact information. Therefore, Relation engaged a vendor to obtain contact information for potentially impacted individuals via an advanced address review service. On February 20, 2020, the advanced address review service identified two (2) New Hampshire residents.

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The type of information in the account varied by potentially affected individual but included the following: first and last name and Social Security number.

#### **Notice to New Hampshire Residents**

On or about February 28, 2020, Relation will begin providing written notice of this incident to affected individuals, which includes approximately two (2) New Hampshire residents. 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 this incident, Relation moved quickly to investigate and respond to this event and assess the security of Relation's systems, including its employee email accounts. Relation also reviewed existing security policies and implemented additional security measures, including multi-factor authentication and additional employee training on data security. Relation reported this incident to law enforcement and is notifying appropriate state and federal regulators. Relation is also providing potentially impacted individuals with access to credit monitoring and identity protection services for one (1) year through Kroll.

Additionally, Relation is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud. Relation is also providing individuals with 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) 930-4815.

Very truly yours,



Michael J. Bonner of  
MULLEN COUGHLIN LLC

MJB/ken

# EXHIBIT A



**Relation Insurance Services**

9225 Indian Creek Parkway, Suite 700, Overland Park, Kansas 66210

<<Date>> (Format: Month Day, Year)

<<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>  
<<address\_1>>  
<<address\_2>>  
<<city>>, <<state\_province>> <<postal\_code>>  
<<country >>

Dear <<first\_name>> <<middle\_name>> <<last\_name>> <<suffix>>,

Relation Insurance, Inc. ("Relation"), an insurance broker, is providing you notice of a recent event that may impact the privacy of some of your personal information. Relation takes the protection of your information very seriously, and although we have no evidence of actual or attempted misuse of your information potentially affected by this incident, this letter provides details of the incident, our response, and resources available to you to help protect your personal information from possible misuse, should you feel it is appropriate to do so.

**What Happened?** On August 15, 2019, Relation became aware of unusual activity in an employee's email account. We immediately secured the employee's email account and launched an investigation, with the assistance of a third-party computer forensics expert, to determine what may have happened and what information may have been affected. Our investigation determined that an unknown individual had access to the email account between August 14th and August 15th of 2019. We then undertook a comprehensive review of emails that were present in the account at the time of the incident to identify what personal information was stored within the emails and to whom that information relates. On October 16, 2019, Relation confirmed personal information was present in the email account and began reviewing its files to determine which business partners were associated with this information. On December 13, 2019, Relation provided notice of this incident to the insurance providers with which it does business and worked to confirm notice obligations. Relation also engaged in an extensive review of its files to confirm address information. Although we are unaware of any actual or attempted misuse of your personal information, we are providing you this notification out of an abundance of caution because your information was present in the email account.

**What Information Was Involved?** The information present in the email account at the time of the incident may have included your first and last name and the following identifiers: <<b2b\_text\_3(impacted data)>>.

**What Are We Doing?** Information privacy and security are among our highest priorities. Relation has strict security measures in place to protect information in our care. Upon discovering this incident, we immediately took steps to confirm the security of our systems, including our employee email accounts. We reviewed existing security policies and implemented additional measures to further protect information, including enhanced email security. We also reported this incident to law enforcement. In an abundance of caution, we are notifying potentially impacted individuals, including you, so that you may take steps to best protect your information, should you feel it is appropriate to do so. Although we are unaware of any actual or attempted misuse of information as a result of this incident, we arranged to have Kroll protect your identity for one (1) year at no cost to you as an added precaution.

**What Can You Do?** 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. You may review the information contained in the attached "Steps You Can Take to Protect Your Information." You may also enroll to receive the identity protection services we are making available to you. There is no charge to you for the cost of this service; however, you will need to enroll yourself in this service.

**For More Information.** We recognize that you may have questions not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-844-902-2034 (toll free), Monday through Friday, 9:00 a.m. to 6:30 p.m., ET.

We sincerely regret any inconvenience this incident may cause you. Protecting your information is important to us, and Relation remains committed to safeguarding the information in our care.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward Nathan Page". The signature is written in a cursive, flowing style.

Edward Nathan Page  
President  
Relation Insurance, Inc.

## Steps You Can Take to Help Protect Your Information

### **Activate Your Identity Monitoring**

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one (1) year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit [enroll.idheadquarters.com](http://enroll.idheadquarters.com) to activate and take advantage of your identity monitoring services.

You have until <<date>> to activate your identity monitoring services.

Membership Number: <<Member ID>>

### **Monitor Accounts, Financial, and Medical Billing Statements**

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, medical bills, explanation of benefits (EOBs), and credit reports for suspicious charges or claims. Under U.S. law you are entitled to one (1) free credit report annually from each of the three (3) major credit reporting bureaus. To order your free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. You may also contact the three (3) 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**

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

[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

#### **TransUnion**

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

[www.transunion.com/credit-freeze](http://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](http://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.); and
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 one (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 (7) years. Should you wish 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](http://www.experian.com/fraud/center.html)

#### **TransUnion**

P.O. Box 2000  
Chester, PA 19106  
1-800-680-7289

[www.transunion.com/fraud-alerts](http://www.transunion.com/fraud-alerts)

#### **Equifax**

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

[www.equifax.com/personal/credit-report-services](http://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](http://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.



### **TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES**

You've been provided with access to the following services<sup>1</sup> from Kroll:

#### **Single Bureau Credit Monitoring**

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

#### **Fraud Consultation**

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

#### **Identity Theft Restoration**

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

<sup>1</sup> Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.