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File No. 28399.271

VIA E-MAIL

Gordon MacDonald, Attorney General
Consumer Protection and Antitrust Bureau
Office of the Attorney General
33 Capitol Street
Concord, NH 03301
E-Mail: DOJ-CPB@doj.nh.gov

Re: Notice of Data Security Incident

Dear Attorney General MacDonald:

I represent Solera National Bank (“Solera”), located in Lakewood, Colorado. This letter is being sent pursuant to N.H. Rev. Stat. §§359-C:19-21, because on June 5, 2018, Solera determined the personal information of approximately one (1) New Hampshire resident may have been affected by a data security incident. The incident may have involved unauthorized access to residents’ names, addresses, Social Security numbers, driver’s license, state-issued identification card or other government identification card numbers, passport numbers, financial account numbers, and other information necessary to open an account.

On April 18, 2018, Solera learned that an employee email account was accessed without authorization. Upon discovering the incident, Solera immediately took measures to disable any unauthorized access to Solera employee email accounts. Solera also launched an investigation, and engaged a digital forensics firm to help determine what occurred and whether personal information was accessed without authorization. On May 4, 2018 the forensics investigation determined that an additional email account was affected. Since that time, Solera has worked diligently to identify any individuals whose personal information may have been accessible in the affected email accounts. On June 5, 2018, Solera was able to identify the potentially affected individuals.

Solera is in the process of notifying the affected New Hampshire resident via the attached letter. Solera is offering twelve (12) months of complementary credit monitoring and identity monitoring services to the affected resident through Kroll. Please contact me should you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read 'L. Nickle', is positioned above the typed name.

Lindsay B. Nickle of
LEWIS BRISBOIS BISGAARD & SMITH LLP

Encl.: Consumer Notification Letter



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

<<MemberFirstName>> <<MemberMiddleName>> <<MemberLastName>> <<Suffix>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<ZipCode>>

Re: Notice of Data Breach

Dear <<MemberFirstName>> <<MemberLastName>>,

We are writing to inform you of a data security incident that may have involved your personal information. At Solera National Bank (“Solera”), we take the privacy and security of your information very seriously, and appreciate your trust in us. This letter contains information about steps you can take to protect yourself and about resources we are making available to help you.

What Happened? On April 18, 2018, Solera learned that an employee email account was accessed without authorization. Upon discovering the incident, we immediately took measures to disable any unauthorized access to Solera employee email accounts. We also launched an investigation and engaged a digital forensics firm to help us determine what happened and whether personal information was accessed without authorization. On May 4, 2018 the forensics investigation determined that an additional email account was affected. Since that time, we have worked diligently to identify any individuals whose personal information may have been affected by this incident. Our investigation indicates that some customers’ personal information may have been accessible.

We would like to emphasize that this incident did not affect our core data systems, and only the email accounts discussed above were involved. If you provided us your information via our secure file upload function, and not directly in an email, it is unlikely that your information was impacted.

What Information Was Involved? If you provided us with confidential data via email and you are receiving this letter, it is possible that your name, address, Social Security number, driver’s license, state-issued identification card or other government identification card number, passport number, financial account number, and other information necessary to open an account may have been impacted.

What You Can Do and What We Are Doing: At this time, we are unaware of the misuse of any information involved in this incident. However, out of an abundance of caution, we have secured the services of Kroll to provide identity monitoring at no cost to you for one 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, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit <<IDMonitoringURL>> to activate and take advantage of your identity monitoring services.

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

Membership Number: <<Member ID>>

To receive credit services by mail instead of online, please call 1-???-???-???.

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. Additional information describing your services is included with this letter. Also, please review the recommendations included with this letter about steps you can take to protect your personal information.

In addition to the steps discussed above, we are taking measures to further safeguard personal information and minimize the likelihood that an event like this could occur in the future by increasing our email security and conducting security training for our staff.

For More Information: We sincerely regret any inconvenience or concern this matter may cause you. If you have questions or need assistance, please call 1-???-???-???? from 7:00 A.M. to 4:00 P.M. MT, Monday through Friday.

Sincerely,

A handwritten signature in black ink that reads "David P. Melton". The signature is written in a cursive style with a large initial "D" and "M".

David P. Melton

SVP OPERATIONS

Solera National Bank

STEPS YOU CAN TAKE TO FURTHER 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 reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

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/>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print this form at <https://www.annualcreditreport.com/cra/requestformfinal.pdf>. You also can contact one of the following three national credit reporting agencies:

TransUnion	Experian	Equifax	Free Annual Report
P.O. Box 1000	P.O. Box 9532	P.O. Box 105851	P.O. Box 105281
Chester, PA 19016	Allen, TX 75013	Atlanta, GA 30348	Atlanta, GA 30348
1-877-322-8228	1-888-397-3742	1-800-525-6285	1-877-322-8228
www.transunion.com	www.experian.com	www.equifax.com	annualcreditreport.com

Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay 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 identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: In some U.S. states, you have the right to put a security freeze on your credit file. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. If you request a security freeze from a consumer reporting agency there may be a fee up to \$10 to place, lift or remove the security freeze. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy **of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.**

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state. Residents of Maryland, North Carolina, and Rhode Island can obtain more information from their Attorneys General using the contact information below.

Federal Trade Commission	Maryland Attorney General	North Carolina Attorney General	Rhode Island Attorney General
600 Pennsylvania Ave, NW	200 St. Paul Place	9001 Mail Service Center	150 South Main Street
Washington, DC 20580	Baltimore, MD 21202	Raleigh, NC 27699	Providence, RI 02903
consumer.ftc.gov , and	oag.state.md.us	ncdoj.gov	http://www.riag.ri.gov
www.ftc.gov/idtheft	1-888-743-0023	1-877-566-7226	401-274-4400
1-877-438-4338			

You also have certain rights under the Fair Credit Reporting Act (FCRA), including the right to know what is in your file, to dispute incomplete or inaccurate information, and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, and your rights pursuant to the FCRA, please visit http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services¹ 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.

\$1 Million Identity Fraud Loss Reimbursement

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

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.

¹ Kroll's activation website is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari. 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.