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August 30, 2021

VIA E-MAIL

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

Re: Notice of Data Security Incident

Dear Attorney General MacDonald:

We represent SourceOne Insurance Group (“SourceOne”), an insurance agency located in Fort Wayne, Indiana. This letter is being submitted because the personal information of one (1) New Hampshire resident may have been affected by a recent data security incident experienced by SourceOne. The incident may have involved unauthorized access to one resident’s name and Social Security number.

On May 11, 2021, SourceOne detected unusual activity in a SourceOne employee email account after suspicious emails were observed originating from the user’s account to some of her contacts. Upon discovering this activity, SourceOne immediately notified its information technology service provider, who reset the user’s password, as well as passwords for all other users in the email tenant. SourceOne also launched an investigation with the assistance of a leading, independent forensics firm engaged to determine what happened and whether sensitive information was accessed or acquired without authorization. As a result of this investigation, SourceOne learned that certain SourceOne employee email accounts had been accessed without authorization between approximately April 20 and May 11, 2021. SourceOne then conducted a comprehensive review of the contents of the accounts and, on July 15, 2021, substantially completed this process and learned that the impacted SourceOne employee email accounts contained personal information belonging to certain individuals. On August 3, 2021, SourceOne notified its employer-clients of the incident and subsequently began taking additional steps to identify address information. Through this process, SourceOne determined that personal information belonging to one (1) New Hampshire resident was contained in the affected accounts. SourceOne then worked diligently to provide notification.

SourceOne notified one (1) potentially affected New Hampshire resident of this incident via the attached sample letter, or a substantially similar version, on August 30, 2021. In so doing, SourceOne offered twelve (12) months of complimentary credit monitoring and identity theft restoration services through IDX, a global leader in risk mitigation and response. These services

include: credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services.

Please contact me should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Kevin Yoegel". The signature is written in a cursive style with a clear, legible font.

Kevin W. Yoegel of
LEWIS BRISBOIS BISGAARD & SMITH LLP

Encl: Sample Consumer Notification Letter



10300 SW Greenburg Rd.
Suite 570
Portland, OR 97223

To Enroll, Please Call:
1-833-903-3648
Or Visit:
<https://app.idx.us/account-creation/protect>
Enrollment Code:
<<XXXXXXXXXX>>

<<First Name>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip>>

August 26, 2021

Re: Notice of Data Security Incident

Dear <<FirstName>> <<LastName>>,

We are writing to inform you of a data security incident experienced by SourceOne Insurance Group (“SourceOne”), that may have affected your personal information.¹ As explained below, we recently learned that an unauthorized individual gained access to certain SourceOne employee email accounts that contained some of your personal information. We are writing to notify you of this incident, to offer you complimentary identity monitoring and protection services, and to inform you about steps that can be taken to help protect your personal information.

What Happened? On May 11, 2021, we detected unusual activity relating to a SourceOne employee email account. Upon discovering this activity, we took steps to secure our email system and launched an investigation with the assistance of a leading digital forensics firm to determine what happened and whether personal information may have been accessed or acquired without authorization. Through this investigation, we learned that certain SourceOne employee email accounts had been accessed without authorization between approximately April 20 and May 11, 2021. We then conducted a comprehensive review of the contents of the accounts and, on or around July 15, 2021, learned that the impacted SourceOne employee email accounts contained some of your personal information. We then worked diligently to identify up-to-date address information to notify you. Please note that this unauthorized access was limited to information transmitted via email and did not affect any other information systems.

What Information Was Involved? The information involved may have included your <<variable text>>.

What We Are Doing. As soon as we discovered this incident, we took the measures referenced above and took steps to help prevent a similar incident from occurring in the future. In addition, we reported this matter to the Federal Bureau of Investigation and will provide whatever assistance is necessary to hold the perpetrator(s) of this incident accountable. Finally, we are now offering you complimentary identity protection services through IDX, a data security and recovery services expert. We do not know if your information will be used, but out of an abundance of caution, we are offering you the option to have credit coverage through our company at no charge for one year. Your complimentary one-year enrollment in IDX identity protection includes: credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. Additional information about these services is included with this letter.

What You Can Do. Please read the recommendations included with this letter which you can follow to help protect your personal information. You can also enroll in the IDX identity protection services being provided to you, at no cost, through IDX. To enroll, please visit the IDX website at <https://app.idx.us/account-creation/protect> and provide your enrollment code located at the top of this page. Please note that the deadline to enroll is November 26, 2021. Additional

¹ SourceOne offers insurance solutions for individuals and businesses, and may have been in possession of some of your personal information in connection therewith.

information describing the IDX identity protection services, along with other recommendations to protect your personal information, is included with this letter.

For More Information. Please accept our sincere apologies for any worry or inconvenience that this may cause you. If you have any questions, please call 1-833-903-3648 Monday through Friday from 9 am to 9 pm Eastern Time, or please visit the IDX website at <https://app.idx.us/account-creation/protect> for assistance or for any additional questions you may have. Please have your enrollment code ready.

Sincerely,

A handwritten signature in black ink that reads "Joy DenHouter". The signature is written in a cursive style with a large, stylized initial "J".

Joy DenHouter
Co-Owner
SourceOne Insurance Group

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 also can contact one of the following three national credit reporting agencies:

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| TransUnion P.O. Box 1000 Chester, PA 19016 1-800-916-8800 www.transunion.com | Experian P.O. Box 2002 Allen, TX 75013 1-888-397-3742 www.experian.com | Equifax P.O. Box 740241 Atlanta, GA 30374 1-866-349-5191 www.equifax.com | Free Annual Report P.O. Box 105281 Atlanta, GA 30348 1-877-322-8228 annualcreditreport.com |
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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: Under U.S. law, you have the right to put a security freeze on your credit file for up to one year at no cost. 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. 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 fraud alerts, security freezes, and 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.

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| Federal Trade Commission 600 Pennsylvania Ave, NW Washington, DC 20580 consumer.ftc.gov , and www.ftc.gov/idtheft 1-877-438-4338 | Maryland Attorney General 200 St. Paul Place Baltimore, MD 21202 oag.state.md.us 1-888-743-0023 | New York Attorney General Bureau of Internet and Technology Resources 28 Liberty Street New York, NY 10005 1-212-416-8433 |
| North Carolina Attorney General 9001 Mail Service Center Raleigh, NC 27699 ncdoj.gov 1-877-566-7226 | Rhode Island Attorney General 150 South Main Street Providence, RI 02903 http://www.riag.ri.gov 1-401-274-4400 | Washington D.C. Attorney General 441 4th Street, NW Washington, DC 20001 oag.dc.gov 1-202-727-3400 |

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



One-Year Enrollment in IDX Identity Protection

Website and Enrollment. Please visit <https://app.idx.us/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code included with this letter.

Activate the credit monitoring provided as part of your IDX membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

Telephone. Contact IDX at **1-833-903-3648** to speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

This IDX enrollment will include one-year enrollment into:

SINGLE BUREAU CREDIT MONITORING - Monitoring of credit bureau for changes to the member's credit file such as new credit inquires, new accounts opened, delinquent payments, improvements in the member's credit report, bankruptcies, court judgments and tax liens, new addresses, new employers, and other activities that affect the member's credit record.

CYBERSCAN™ - Dark Web monitoring of underground websites, chat rooms, and malware, 24/7, to identify trading or selling of personal information like SSNs, bank accounts, email addresses, medical ID numbers, driver's license numbers, passport numbers, credit and debit cards, phone numbers, and other unique identifiers.

IDENTITY THEFT INSURANCE - Identity theft insurance will reimburse members for expenses associated with restoring their identity should they become a victim of identity theft. If a member's identity is compromised, the policy provides coverage for up to \$1,000,000, with no deductible, from an A.M. Best "A-rated" carrier. Coverage is subject to the terms, limits, and/or exclusions of the policy.

FULLY-MANAGED IDENTITY RECOVERY - IDX fully-managed recovery service provides restoration for identity theft issues such as (but not limited to): account creation, criminal identity theft, medical identity theft, account takeover, rental application, tax fraud, benefits fraud, and utility creation. This service includes a complete triage process for affected individuals who report suspicious activity, a personally assigned IDX Specialist to fully manage restoration of each case, and expert guidance for those with questions about identity theft and protective measures.