

RECEIVED

SEP 23 2021

CONSUMER PROTECTION

9/20/2021

Office of the Attorney General  
Consumer Protection & Antitrust Bureau  
33 Capitol Street  
Concord, NH 03301

RE: Notice of Data Event

Dear NH Attorney General:

Rawson & Sons Insurance Agency LLC uses an agency management software and service called QQCatalyst, which is provided by Vertafore. Vertafore takes seriously the responsibility to protect personal information.

On November 30, 2020, Vertafore discovered a configuration error in its insurance agency management product, QQCatalyst. Immediately upon becoming aware of the issue, Vertafore fixed the configuration error and secured the potentially affected files. Vertafore has also been investigating the extent to which data may have been impacted and identifying customers and individuals for notification. These investigations take time, and while Vertafore has been moving quickly, they took time to provide providing accurate information. Vertafore has reported the matter to U.S. federal law enforcement.

As a result of the configuration error, there was unauthorized access to reports and forms generated using QQCatalyst. Other files uploaded to QQCatalyst, including insurance applications and quotes, were accessible to the public, though Vertafore could not determine whether these files were actually accessed by unauthorized parties. The configuration error existed between 2012 and December 2020.

The information impacted could include the following kinds of information: names, addresses, birthdates, and driver's license numbers. In some cases, Social Security numbers, credit card numbers and bank account information may have been impacted if stored in QQCatalyst. Vertafore engaged a leading security firm to search for evidence indicating potential misuse of the information in connection with this event and did not find any.

On or around 8/1/2021, our 45 NH residents were notified about the event. It should be noted that the security expert hired to investigate the breach did not determine that our clients' information was accessed or used maliciously. Regardless, as the information was open to the public, we thought it was ethically the right thing to notify everyone about the event. Vertafore is offering each individual one year of free credit monitoring and identity restoration services through Kroll. Individuals have 90 days to register. A sample individual notice is included in this correspondence.

Vertafore maintains information security policies, procedures, practices and controls. They continually monitor our network and systems for unusual activity and are working to further enhance security so they can stay ahead of this type of activity.

Sincerely,

Elizabeth Rawson  
Managing Partner  
Rawson & Sons Insurance Agency LLC  
51 Union Street, Suite 209  
Worcester, MA 01608  
[liz@rawsoninsurance.com](mailto:liz@rawsoninsurance.com)  
[www.rawsoninsurance.com](http://www.rawsoninsurance.com)



## Important Legal Notice

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

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

### Notice of Data Breach

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

<<b2b\_text\_1(AgencyName)>> uses an agency management software and service called QQCatalyst, which is provided by Vertafore. Vertafore takes seriously the responsibility to protect your personal information. As such, we are writing to inform you about a configuration error at Vertafore impacting some of your personal information.

#### What Happened?

On November 30, 2020, Vertafore discovered a configuration error in its insurance agency management product, QQCatalyst. As a result, there was unauthorized access to reports and forms generated using QQCatalyst. Other files uploaded to QQCatalyst, including insurance applications and quotes, were accessible to the public, though we cannot determine whether these files were actually accessed by unauthorized parties.

Immediately upon becoming aware of the issue, Vertafore fixed the configuration error and secured the potentially affected files. Vertafore has also been investigating the extent to which data may have been impacted and identifying customers and individuals for notification. These investigations take time, and while we have been moving quickly, we have taken time to be sure we're providing accurate information. Vertafore has reported the matter to U.S. federal law enforcement.

#### What Information Was Involved?

The information impacted could include the following kinds of information: names, addresses, birth dates, and driver's license numbers. In some cases, Social Security numbers, credit card numbers, and bank account information may have been impacted if <<b2b\_text\_1(AgencyName)>> stored that information in QQCatalyst.

#### What We Are Doing.

Vertafore engaged a leading security firm to search for evidence indicating potential misuse of the information in connection with this event and did not identify any.

Out of an abundance of caution, Vertafore is offering you one year of free credit and identity monitoring services in recognition that these services offer valuable protection in other contexts beyond this event. More information about these services, including how to activate them, is attached to this notice.

While we continually monitor our network and systems for unusual activity, Vertafore, like any other company, is not immune from this type of event. We maintain information security policies, procedures, practices, and controls, and we are working to further enhance our security tools, policies, and procedures, as well as our security governance and staffing.

**What You Can Do.**

In addition to taking advantage of the free credit and identity monitoring service, it is always a good idea to remain vigilant against threats of identity theft or fraud. You can do this by regularly reviewing and monitoring your account statements and credit history for any signs of unauthorized transactions or activity. If you ever suspect that you are the victim of identity theft or fraud, you can contact your local police.

It is also always a good idea to be alert for "phishing" emails or phone calls by someone who acts like they know you or are a company that you may do business with and requests sensitive information over email, such as passwords, Social Security numbers, or financial account information.

More information about protecting against identity theft is attached to this notice.

**For More Information.**

We have set up a call center with additional information about this event, our response, and these services. The call center can be reached by calling 1-855-537-2082 between the hours of 8 a.m. - 5:30 p.m. CT Monday through Friday. We sincerely regret any inconvenience this may cause.

Sincerely,

Vertafore Privacy Team

## HOW TO ACTIVATE FREE 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 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 <https://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>>

You have been provided with access to the following services 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 will be able to help you determine if it is 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 will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

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.

## ADDITIONAL INFORMATION

To protect against possible fraud, identity theft or other financial loss, you should always remain vigilant, review your account statements and monitor your credit reports. Provided below are the names and contact information for the three major U.S. credit bureaus and additional information about steps you can take to obtain a free credit report and place a fraud alert or security freeze on your credit report. If you believe you are a victim of fraud or identity theft, you can contact your local law enforcement agency, your state's attorney general, or the Federal Trade Commission. Please know that contacting us will not expedite any remediation of suspicious activity.

### INFORMATION ON OBTAINING A FREE CREDIT REPORT

U.S. residents are entitled under U.S. law to one free credit report annually from each of the three major credit bureaus. To order your free credit reports, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll-free at +1 (877) 322-8228.

### INFORMATION ON IMPLEMENTING A FRAUD ALERT OR SECURITY FREEZE

You may contact the three major credit bureaus at the addresses below to place a fraud alert on your credit report. A fraud alert indicates to anyone requesting your credit file that you suspect you are a possible victim of fraud. A fraud alert does not affect your ability to get a loan or credit. Instead, it alerts a business that your personal information might have been compromised and requires that business to verify your identity before issuing you credit. Although this may cause some short delay if you are the one applying for the credit, it might protect against someone else obtaining credit in your name.

A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit, mortgages, employment, housing or other services.

A credit reporting agency may not charge you to place, temporarily lift, or permanently remove a security freeze. To place a fraud alert or security freeze on your credit report, you must contact the three credit bureaus below:

<b>Equifax:</b> Consumer Fraud Division P.O. Box 740256 Atlanta, GA 30374 +1 (800) 525-6285 <a href="http://www.equifax.com">www.equifax.com</a>	<b>Experian:</b> Credit Fraud Center P.O. Box 9554 Allen, TX 75013 +1 (888) 397-3742 <a href="http://www.experian.com">www.experian.com</a>	<b>TransUnion:</b> TransUnion LLC P.O. Box 2000 Chester, PA 19016-2000 +1 (800) 680-7289 <a href="http://www.transunion.com">www.transunion.com</a>
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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, the addresses where you have lived over those prior five years;
5. Proof of current address such as a current utility bill or telephone bill; and
6. A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, etc.).

You may also contact the U.S. Federal Trade Commission ("FTC") for further information on fraud alerts, security freezes, and how to protect yourself from identity theft. The FTC can be contacted at 400 7th St. SW, Washington, DC 20024; telephone +1 (877) 382-4357; or [www.consumer.gov/idtheft](http://www.consumer.gov/idtheft).

You may also contact the U.S. Federal Trade Commission ("FTC") for further information on fraud alerts, security freezes, and how to protect yourself from identity theft. The FTC can be contacted at 400 7th St. SW, Washington, DC 20024; telephone +1 (877) 382-4357; or [www.consumer.gov/idtheft](http://www.consumer.gov/idtheft).

#### ADDITIONAL RESOURCES

Your state attorney general may also have advice on preventing identity theft, and you should report instances of known or suspected identity theft to law enforcement, your state attorney general, or the FTC.

**California Residents:** Visit the California Office of Privacy Protection (<https://oag.ca.gov/privacy>) for additional information on protection against identity theft.

**Iowa Residents:** The Attorney General can be contacted at Office of Attorney General of Iowa, Hoover State Office Building, 1305 E. Walnut Street, Des Moines, Iowa 50319, +1 (515) 281-5164, [www.iowaattorneygeneral.gov](http://www.iowaattorneygeneral.gov).

**Kentucky Residents:** The Attorney General can be contacted at Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601, [www.ag.ky.gov](http://www.ag.ky.gov), Telephone: +1 (502) 696-5300.

**Maryland Residents:** The Attorney General can be contacted at Office of Attorney General, 200 St. Paul Place, Baltimore, Maryland 21202; +1 (888) 743-0023; or [www.marylandattorneygeneral.gov](http://www.marylandattorneygeneral.gov).

**Massachusetts Residents:** Under Massachusetts law, you have the right to obtain any police report filed in connection to the incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

**North Carolina Residents:** The Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001; +1 (919) 716-6400; or [www.ncdoj.gov](http://www.ncdoj.gov).

**New Mexico Residents:** You have rights under the federal Fair Credit Reporting Act (FCRA), which governs the collection and use of information pertaining to you by consumer reporting agencies. For more information about your rights under the FCRA, please visit [www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf](http://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf) or [www.ftc.gov](http://www.ftc.gov).

**Oregon Residents:** The Attorney General can be contacted at Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, +1 (877) 877-9332 (toll-free in Oregon), +1 (503) 378-4400, or [www.doj.state.or.us](http://www.doj.state.or.us).

**Rhode Island Residents:** The Attorney General can be contacted at 150 South Main Street, Providence, Rhode Island 02903; +1 (401) 274-4400; or [www.riag.ri.gov](http://www.riag.ri.gov). You may also file a police report by contacting local or state law enforcement agencies.