

STATE OF NEW HAMPSHIRE  
DEPT OF JUSTICE  
2015 JUL 13 AM 11:55

July 10, 2015

Lindsay B. Nickle  
214.698.8093 (direct)  
Lindsay.Nickle@wilsonelser.com

Via US Postal Service

Attorney General Joseph Foster  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03302

Re: Data Security Incident

Dear Attorney General Foster:

We represent Alfa Specialty Insurance Corporation and Alfa Vision Insurance Corporation (“Alfa”), providers of auto insurance policies, with respect to a recent security incident involving the potential disclosure of certain personal information described in more detail below. Notification is being provided to impacted individuals.

**1. Nature of security incident.**

On May 4, 2015, Alfa learned that one of the computer servers at the Brentwood, Tennessee location inadvertently made personal information related to auto insurance policies accessible to the internet. Alfa secured the computer server, began an investigation to determine what information was at risk, and hired independent forensic experts to assist with the investigation. Based on the information learned through the investigation, the involved records appear to contain customer names, addresses, dates of birth, driver’s license numbers, and Social Security numbers.

**2. Number of New Hampshire residents affected.**

Five (5) New Hampshire residents were affected by the security incident. Notification letters to those individuals were mailed on July 10, 2015 via regular mail. A copy of the notification letter is included with this letter.

**3. Steps you have taken or plan to take relating to the incident.**

Alfa has taken steps to secure the computer server so that none of the involved personal information remains accessible to the internet and to remove information cached on the internet. In addition, Alfa has taken steps to evaluate its security measures in an effort to prevent this type of event from happening again. Alfa is also offering potentially impacted individuals with identity protection services through AllClear ID. Notification is also being provided to the credit reporting agencies.

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Bank of America Plaza, 901 Main Street, Suite 4800 • Dallas, TX 75202 • p 214.698.8000 • f 214.698.1101

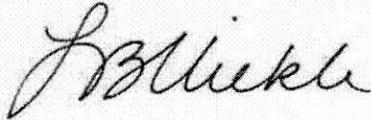
Albany • Baltimore • Boston • Chicago • Connecticut • Dallas • Denver • Garden City • Houston • Las Vegas • London • Los Angeles • Louisville • McLean  
Miami • New Jersey • New York • Orlando • Philadelphia • San Diego • San Francisco • Washington, DC • West Palm Beach • White Plains  
Affiliates: Berlin • Cologne • Frankfurt • Munich • Paris

**wilsonelser.com**

**4. Contact information.**

Alfa remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at [Lindsay.Nickle@wilsonelser.com](mailto:Lindsay.Nickle@wilsonelser.com) or (214) 698-8093.

Very truly yours,



Lindsay B. Nickle

Enclosure



Alfa Specialty Insurance Corporation  
Alfa Vision Insurance Corporation  
The Vision Insurance Group, LLC

Processing Center • P.O. BOX 141578 • Austin, TX 78714



00001  
JOHN Q. SAMPLE  
1234 MAIN STREET  
ANYTOWN US 12345-6789

July 10, 2015

Dear John Sample,

We are writing to inform you of an event which may affect the security of your personal information including your name and Social Security number. To be clear, none of your bank account, credit card, or other financial information was involved. While we are not aware of any attempted or actual misuse of your information, this notice is being provided so you may take steps to monitor your identity, financial accounts, and credit reports. This letter contains information about steps you can take to protect your information, and resources we are making available to help you.

On May 4, 2015, we became aware of a data security event involving one of the computer servers at our Brentwood, Tennessee location. This event inadvertently made your personal information related to an auto insurance policy accessible to the internet. We quickly secured the computer server, began an investigation to determine what information was at risk, and hired independent experts to assist us. The affected information may have included your name, address, date of birth, driver's license number, and Social Security number. We may have obtained this information in connection with auto insurance provided by Alfa Specialty Insurance Corporation or Alfa Vision Insurance Corporation in one of the following states: Arkansas, Georgia, Indiana, Kentucky, Missouri, Ohio, Tennessee, Texas, and Virginia.

As an added precaution, we have arranged to have AllClear ID protect your identity for 12 months at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next 12 months.

**AllClear SECURE:** The team at AllClear ID is ready and standing by if you need identity repair assistance. This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-731-6019 and a dedicated investigator will do the work to recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

**AllClear PRO:** This service offers additional layers of protection including credit monitoring and a \$1 million identity theft insurance policy. To use the PRO service, you will need to provide your personal information to AllClear ID. **You may sign up online at [enroll.allclearid.com](http://enroll.allclearid.com) or by phone by calling 1-855-731-6019 using the following redemption code: Redemption Code.**

Please note: Additional steps may be required by you in order to activate your phone alerts.

We have established a confidential assistance line to respond to any questions you have about this event or this letter. Please call 1-855-731-6019 Monday through Saturday from 8:00 a.m.–8:00 p.m., Central



01-02-1-00

Time, with any questions or concerns. For your protection, if someone contacts you about this event and asks for your personal information, do not provide any information and call the assistance line.

We take the privacy and security of your information very seriously, and sincerely regret any concern or inconvenience this may cause you. Please know that the protection and security of your personal information is our priority.

Sincerely,

A handwritten signature in black ink, appearing to be 'John C. Pace', written in a cursive style.

John C. Pace  
President

## U.S. State Notification Requirements

### For residents of Hawaii, Michigan, Missouri, Virginia, Vermont, and North Carolina:

It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

### For residents of Illinois, Iowa, Maryland, Missouri, North Carolina, Oregon, and West Virginia:

It is required by state laws to inform you that you may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report by contacting any one or more of the following national consumer reporting agencies:

#### **Equifax**

P.O. Box 105851  
Atlanta, GA 30348  
1-800-685-1111  
[www.equifax.com](http://www.equifax.com)

#### **Experian**

P.O. Box 2002  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com](http://www.experian.com)

#### **TransUnion**

P.O. Box 6790  
Fullerton, CA 92834  
1-800-916-8800  
[www.transunion.com](http://www.transunion.com)

You may also obtain a free copy of your credit report online at [www.annualcreditreport.com](http://www.annualcreditreport.com), by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at [www.annualcreditreport.com](http://www.annualcreditreport.com)) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

### For residents of Iowa:

State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

### For residents of Oregon:

State laws advise you to report any suspected identity theft to law enforcement, as well as the Federal Trade Commission.

### For residents of Maryland, Illinois, and North Carolina:

You can obtain information from the Maryland and North Carolina Offices of the Attorneys General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

#### **Maryland Office of the Attorney General**

Consumer Protection Division  
200 St. Paul Place  
Baltimore, MD 21202  
1-888-743-0023  
[www.oag.state.md.us](http://www.oag.state.md.us)

#### **North Carolina Office of the Attorney General**

Consumer Protection Division  
9001 Mail Service Center  
Raleigh, NC 27699-9001  
1-877-566-7226  
[www.ncdoj.com](http://www.ncdoj.com)

#### **Federal Trade Commission Consumer Response Center**

600 Pennsylvania Avenue, NW  
Washington, DC 20580  
1-877-IDTHEFT (438-4338)  
[www.ftc.gov/bcp/edu/microsites/idtheft](http://www.ftc.gov/bcp/edu/microsites/idtheft)

### For residents of Massachusetts:

It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft.

### For residents of all states:

**Fraud Alerts:** You can place fraud alerts with the three credit bureaus at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. The contact information for all three credit bureaus is below:

**Monitoring:** You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

**Security Freeze:** You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to send a request to each consumer reporting agency by certified mail, overnight mail, or regular stamped mail. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. The consumer reporting agency may charge a fee of up to \$5.00 to place a freeze or lift or remove a freeze, but is free if you are a victim of identity theft or the spouse of a victim of identity theft, and you have submitted a valid police report relating to the identity theft incident to the consumer reporting agency. You may obtain a security freeze by contacting any one or more of the following national consumer reporting agencies:

#### **Equifax Security Freeze**

P.O. Box 105788  
Atlanta, GA 30348  
[www.equifax.com](http://www.equifax.com)

#### **Experian Security Freeze**

P.O. Box 9554  
Allen, TX 75013  
<http://www.experian.com/freeze>

#### **TransUnion (FVAD)**

P.O. Box 2000  
Chester, PA 19022  
[www.transunion.com](http://www.transunion.com)

More information can also be obtained by contacting the Federal Trade Commission listed above.



## **AllClear Secure Terms of Use**

If you become a victim of fraud using your personal information without authorization, AllClear ID will help recover your financial losses and restore your identity. Benefits include:

- 12 months of coverage with no enrollment required;
- No cost to you – ever. AllClear Secure is paid for by the participating Company.

### **Services Provided**

If you suspect identity theft, simply call AllClear ID to file a claim. AllClear ID will provide appropriate and necessary remediation services ("Services") to help restore the compromised accounts and your identity to the state prior to the incident of fraud. Services are determined at the sole discretion of AllClear ID and are subject to the terms and conditions found on the AllClear ID website. AllClear Secure is not an insurance policy, and AllClear ID will not make payments or reimbursements to you for any financial loss, liabilities or expenses you incur.

### **Coverage Period**

Service is automatically available to you with no enrollment required for 12 months from the date of the breach incident notification you received from Company (the "Coverage Period"). Fraud events that occurred prior to your Coverage Period are not covered by AllClear Secure services.

### **Eligibility Requirements**

To be eligible for Services under AllClear Secure coverage, you must fully comply, without limitations, with your obligations under the terms herein, you must be a citizen or legal resident eighteen (18) years of age or older and have a valid U.S. Social Security number. Minors under eighteen (18) years of age may be eligible, but must be sponsored by a parent or guardian. The Services cover only you and your personal financial and medical accounts that are directly associated with your valid U.S. Social Security number, including but not limited to credit card, bank, or other financial accounts and/or medical accounts.

### **How to File a Claim**

If you become a victim of fraud covered by the AllClear Secure services (an "Event"), you must:

- notify AllClear ID by calling 1.855.434.8077 to report the fraud prior to expiration of your Coverage Period;
- provide proof of eligibility for AllClear Secure by providing the redemption code on the notification letter you received from the sponsor Company;
- fully cooperate and be truthful with AllClear ID about the Event and agree to execute any documents AllClear ID may reasonably require; and
- fully cooperate with AllClear ID in any remediation process, including, but not limited to, providing AllClear ID with copies of all available investigation files or reports from any institution, including, but not limited to, credit institutions or law enforcement agencies, relating to the alleged theft.

### **Coverage Under AllClear Secure Does Not Apply to the Following:**

Any expense, damage or loss:

- due to
  - any transactions on your financial accounts made by authorized users, even if acting without your knowledge, or
  - any act of theft, deceit, collusion, dishonesty or criminal act by you or any person acting in concert with you, or by any of your authorized representatives, whether acting alone or in collusion with you or others (collectively, your "Misrepresentation");
- incurred by you from an Event that did not occur during your coverage period; or
- in connection with an Event that you fail to report to AllClear ID prior to the expiration of your AllClear Secure coverage period.

### **Other Exclusions:**

- AllClear ID will not pay or be obligated for any costs or expenses other than as described herein, including without limitation, fees of any service providers not retained by AllClear ID; AllClear ID reserves the right to investigate any asserted claim to determine its validity.
- AllClear ID is not an insurance company, and AllClear Secure is not an insurance policy; AllClear ID will not make payments or reimbursements to you for any loss or liability you may incur.
- AllClear ID is not a credit repair organization, is not a credit counseling service, and does not promise to help you improve your credit history or rating beyond resolving incidents of fraud.
- AllClear ID reserves the right to reasonably investigate any asserted claim to determine its validity. All recipients of Secure coverage are expected to protect their personal information in a reasonable way at all times. Accordingly, recipients will not deliberately or recklessly disclose or publish their Social Security number or any other personal information to those who would reasonably be expected to improperly use or disclose that Personal Information.

### **Opt-out Policy**

If for any reason you wish to have your information removed from the eligibility database for AllClear Secure, please contact AllClear ID:

<b>E-mail</b> support@allclearid.com	<b>Mail</b> AllClear ID, Inc. 823 Congress Avenue Suite 300 Austin, Texas 78701	<b>Phone</b> 1.855.434.8077
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