BakerHostetler

Baker&Hostetler LLP

312 Walnut Street
Suite 3200
Cincinnati, OH 45202-4074

T 513.929.3400
F 513.929.0303
www.bakerlaw.com

Patrick H. Haggerty
direct dial: 513.929.3412
phaggerty@bakerlaw.com

February 9, 2024

VIA EMAIL (CONSUMER@AG.IOWA.GOV)

Consumer Protection Division
Security Breach Notifications
Office of the Attorney General of Iowa
1305 E. Walnut Street
Des Moines, IA 50319-0106

Re: Incident Notification

Dear Sir or Madam:

I am writing on behalf of my client, Trinity Universal Insurance Company and its subsidiaries ("the Company")[1], to notify you of a data security incident involving Hawaii residents.

On July 11, 2023, the Company discovered that a padlocked case ("lockbox") containing backup tapes of certain servers was missing from its Jacksonville, Florida office. The Company immediately launched an investigation and was able to determine that, sometime between July 7 and July 10, 2023, the lockbox went missing from the Jacksonville Office Mail Room Vestibule. The Company personnel searched the Jacksonville office for the lockbox and were unable to locate the missing lockbox. The Company notified law enforcement that the lockbox was missing. To date, the Company has been unable to locate the missing lockbox containing the backup tapes. There is no indication that the lockbox was stolen or that any of the information on the tapes has been accessed or misused.

[1] The subsidiaries include: Alpha Property & Casualty Insurance Company, Charter Indemnity Company, Response Insurance Company, Kemper Financial Indemnity Company, Response Worldwide Insurance Company, Warner Insurance Company, Response Worldwide Direct Auto Insurance Company, Financial Indemnity Company, Kemper Independence Insurance Company, Merastar Insurance Company, Unitrin County Mutual Insurance Company, Infinity County Mutual Insurance Company, Unitrin Advantage Insurance Company, Unitrin Auto and Home Insurance Company, Unitrin Direct Insurance Company, Unitrin Direct Property & Casualty Company, Unitrin Preferred Insurance Company, Unitrin Safeguard Insurance Company, and Valley Property & Casualty Insurance Company.

Nevertheless, the Company conducted a comprehensive review of the data that was contained on the backup tapes, which involved a time- and labor-intensive effort to reconstruct, search and review the data. While the review is ongoing, on January 10, 2024, the Company determined that the tapes contained personal information of 107 Iowa residents, including the individuals' name, address, driver's license number, Social Security number, financial account information and/or claims information such as health insurance and medical information.

On February 9, 2024, the Company began mailing notification letters via United States Postal Service First-Class mail to the individuals whose information has been identified to date, including 107 Iowa residents. The Company also provided substitute notice via nationwide media and a website posting. A sample copy of the notification letter is enclosed. The Company is offering individuals with a Social Security number and/or driver's license number involved a complimentary membership in credit monitoring and identity theft protection services. The Company has also established a toll-free call center to answer any inquiries from individuals.

To help prevent a similar incident in the future, the Company is continuing to review its cybersecurity program and has already made changes to its processes and procedures.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

Patrick H. Haggerty
Partner

Enclosure

TRINITY UNIVERSAL INSURANCE COMPANY

Secure Processing Center
P.O. Box 3826
Suwanee, GA 30024

<<Date>>

<<Name1>>
<<Name2>>
<<Address 1>>
<<Address 2>>
<<City>>, <<State>> <<Zip>>

Dear <<Name1>>:

Trinity Universal Insurance Company and its subsidiaries ("TUIC")[1] are writing to inform you of an incident that involved some of your information. This notice explains the incident, measures we have taken, and steps you may consider taking in response.

TUIC recently completed an investigation into an incident involving backup tapes that went missing from a TUIC office that was in the process of moving to another location. These backup tapes were contained in a padlocked case ("lockbox") and went missing sometime between July 7, 2023 and July 10, 2023. Immediately upon learning of the issue, we began an investigation and attempted to locate the lockbox, but were unsuccessful. We also notified law enforcement. We conducted a comprehensive review of the data that could have been contained on the backup tapes, which involved a time- and labor-intensive effort to reconstruct, search and review the data, and, on <<variable text 1>>, determined that a file contained your name and <<Data Elements>>.

Although there is no indication that the lockbox was stolen or that any of the information on the tapes has been accessed or misused, we wanted to notify you of this incident. We encourage you to remain vigilant by reviewing your financial account statements and credit reports for any unauthorized activity. If you see charges or activity that you did not authorize, please contact the relevant financial institution or credit bureau immediately. We are offering a complimentary one-year membership to Identity Defense Complete. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on identification and resolution of identity theft. For more information on the product, including instructions on how to activate your complimentary one-year membership, as well as some additional steps you can take to protect your personal information, please see the additional information provided in this letter.

We apologize for the inconvenience or concern this incident may cause. We will continue to review our cybersecurity program and have already made changes to our processes and procedures. If you have questions, please call 1-888-542-8828, Monday through Friday from 8:00 am – 8:00 pm Central (excluding major U.S. holidays).

Sincerely,

Trinity Universal Insurance Company

[1] The subsidiaries include: Alpha Property & Casualty Insurance Company, Charter Indemnity Company, Response Insurance Company, Kemper Financial Indemnity Company, Response Worldwide Insurance Company, Warner Insurance Company, Response Worldwide Direct Auto Insurance Company, Financial Indemnity Company, Kemper Independence Insurance Company, Merastar Insurance Company, Unitrin County Mutual Insurance Company, Infinity County Mutual Insurance Company, Unitrin Advantage Insurance Company, Unitrin Auto and Home Insurance Company, Unitrin Direct Insurance Company, Unitrin Direct Property & Casualty Company, Unitrin Preferred Insurance Company, Unitrin Safeguard Insurance Company, and Valley Property & Casualty Insurance Company.

Identity Defense

Enter your Activation Code: <<Activation Code>>
Enrollment Deadline: <<Enroll Deadline>>
Service Term: <<Term Length>>*

Identity Defense Complete

Key Features

- 1-Bureau Credit Monitoring
- Monthly Credit Score and Tracker (VantageScore 3.0)
- Real-Time Authentication Alerts
- High-Risk Transaction Monitoring
- Address Change Monitoring
- Dark Web Monitoring
- Wallet Protection
- Security Freeze Assist
- $1 Million Identity Theft Insurance**

Enrollment Instructions

To enroll in Identity Defense, visit https://app.identitydefense.com/enrollment/activate/kempid

1. Enter your unique Activation Code <<Activation Code>>
   Enter your Activation Code and click 'Redeem Code'.
2. Create Your Account
   Enter your email address, create your password, and click 'Create Account'.
3. Register
   Enter your legal name, home address, phone number, date of birth, Social Security Number, and click 'Complete Account'.
4. Complete Activation
   Click 'Continue to Dashboard' to finish enrolling.

The deadline to enroll is <<Enroll Deadline>>. After <<Enroll Deadline>>, the enrollment process will close, and your Identity Defense code will no longer be active. **If you do not enroll by <<Enroll Deadline>>, you will not be able to take advantage of Identity Defense, so please enroll before the deadline.**

If you need assistance with the enrollment process or have questions regarding Identity Defense, please call Identity Defense directly at 1.866.622.9303.

*Service Term begins on the date of enrollment, provided that the enrollment takes place during the approved enrollment period.
**Identity Theft Insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions, and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 1000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.identitytheft.gov

Fraud Alerts and Credit or Security Freezes:

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name.

That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 160, Woodlyn, PA 19094, www.transunion.com
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com

You'll need to supply your name, address, date of birth, Social Security number and other personal information.

After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

Additional Information for Residents of the Following States:

New York: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, http://www.dos.ny.gov/consumerprotection; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, https://ag.ny.gov

North Carolina: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov

Rhode Island: This incident involves <<RI #>> individuals in Rhode Island. Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: *Rhode Island Attorney General's Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov

West Virginia: You have the right to ask that nationwide consumer reporting agencies place "fraud alerts" in your file to let potential creditors and others know that you may be a victim of identity theft, as described above. You also have a right to place a security freeze on your credit report, as described above.

A Summary of Your Rights Under the Fair Credit Reporting Act: The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information.
- Consumer reporting agencies may not report outdated negative information.
- Access to your file is limited.
- You must give your consent for reports to be provided to employers.
- You may limit "prescreened" offers of credit and insurance you get based on information in your credit report.
- You have a 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.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.