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CLIENT/MATTER NUMBER
117351-0102

May 14, 2021

VIA E-MAIL: consumer@ag.iowa.gov

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

Re: Notification Pursuant to Iowa Code § 715C.2

Dear Attorney General Miller:

We are writing on behalf of our client, Insurance Technologies Corporation (“ITC”), to notify you of a breach of security involving the personal information of six hundred fifty-eight (658) individual insureds who reside in Iowa. ITC is submitting this notification on behalf of its insurance broker customers who opted in to have ITC send written notification to your Office in accordance with Iowa Code § 715C.2. The names of the customers on whose behalf ITC is submitting this notification and the total numbers of their potentially affected insureds who reside in Iowa, respectively, are attached hereto at Exhibit A. ITC notified the customers listed in Exhibit A on March 30, 2021.

NATURE OF THE INCIDENT

ITC provides insurance brokers with technology solutions including a software application called AgencyMatrix, which offers a cloud-based agency management system that allows brokers to effectively manage their business.

On February 27, 2021, an unauthorized third party gained access to the AgencyMatrix application and acquired certain personal information of insureds that was stored in that application. Upon learning of the issue, ITC immediately commenced an investigation through which it contained the incident on March 4, 2021. ITC also notified federal law enforcement and retained an independent forensics firm to assist with the investigation and analysis of the incident.

As part of its investigation, ITC determined that the personal information involved in this incident may have included individuals’ full names and Social Security numbers and/or driver’s license numbers, and possibly their dates of birth and/or usernames and passwords to the AgencyMatrix application. To date, ITC has no evidence that any of the information potentially involved in this incident has been misused.

AUSTIN
BOSTON
CHICAGO
DALLAS
DENVER

DETROIT
HOUSTON
JACKSONVILLE
LOS ANGELES
MADISON

MEXICO CITY
MIAMI
MILWAUKEE
NEW YORK
ORLANDO

SACRAMENTO
SAN DIEGO
SAN FRANCISCO
SILICON VALLEY
TALLAHASSEE

TAMPA
WASHINGTON, D.C.
BRUSSELS
TOKYO

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STEPS TAKEN RELATED TO THE INCIDENT

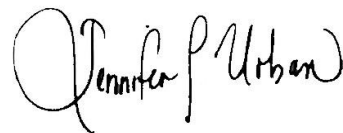
ITC provided substitute notice in USA Today on April 29, 2021. ITC began mailing notifications to the potentially affected Iowa residents on May 10, 2021 via U.S. Mail on behalf of its insurance broker customers who opted in for ITC to do so. A sample copy of the notice that was sent to those individuals is attached hereto at Exhibit B. In order to be fully transparent, we attached a sample copy of the notice that includes the most comprehensive description of personal information involved in this incident. With that said, not all of these data elements apply to the entire population of individuals affected. Thus, we sent the same version of this notice with different variations of data elements affected with respect to each Iowa resident.

Out of an abundance of caution, ITC provided the potentially affected Iowa residents whose Social Security numbers and/or driver's license numbers may have been involved in this incident with credit monitoring and identity protection services through TransUnion Interactive, a subsidiary of TransUnion®, at no charge for a period of twelve (12) months, and has also set up a dedicated support line that will be staffed to answer any questions individuals may have about this incident or the services available to them.

Shortly after discovering this issue, ITC reset all valid passwords to the AgencyMatrix application. In response to this incident, and as part of ITC's continuous commitment to enhance the security of its infrastructure, ITC has implemented additional security measures to help protect the privacy of the information stored on its systems. ITC continues to evaluate and modify its security measures, not only in response to this specific incident, but also in response to the ever-changing security landscape.

If you have any further inquiries concerning this notification, please do not hesitate to contact me.

Sincerely,



Jennifer L. Urban
Foley & Lardner LLP

Enclosures:

Exhibit A – List of ITC's Customers with Corresponding Numbers of Insureds Affected

Exhibit B – Sample Notification Letter



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Exhibit A

Insurance Broker	Total Number of Iowa Residents Affected
Friday Insurance Agency, Inc.	658



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Exhibit B

Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

<<Name 1>>
<<Name 2>>
<<Address 1>>
<<Address 2>>
<<Address 3>>
<<Address 4>>
<<Address 5>>
<<City>>, <<State>> <<Zip>>
<<Country>>

<<Date>>

NOTICE OF DATA BREACH

Dear <<Name 1>>:

WHAT HAPPENED?

At Insurance Technologies Corporation (“ITC”), we value and respect the privacy of your information, which is why, as a precautionary measure, we are writing to inform you of a recent security incident that potentially affects some of your personal information and share some steps that you can take to help protect yourself.

ITC provides your insurance broker with technology solutions including a software application called AgencyMatrix, which offers a cloud-based agency management system that allows your broker to effectively manage their business. On February 27, 2021, an unauthorized third party gained access to our AgencyMatrix application and acquired certain personal information of yours that was stored in that application. Upon learning of the issue, we immediately commenced an investigation through which we contained the incident on March 4, 2021. We also notified federal law enforcement and retained an independent forensics firm to assist with the investigation and analysis of the incident.

WHAT INFORMATION WAS INVOLVED?

As part of our investigation, we determined that the personal information involved in this incident may have included your full name, Social Security number, and driver’s license number, and possibly your date of birth and/or username and password to the AgencyMatrix application. To date, we have no evidence to suggest that any other personally identifiable information of yours was involved in this incident.

WHAT WE ARE DOING

Please know that we take this situation very seriously. The privacy and security of personal information is of utmost importance to us. In light of this incident, and as part of our continuous commitment to enhance the security of our infrastructure, we have implemented additional security measures to help protect the privacy of the information stored on our systems. We continue to evaluate and modify our security measures, not only in response to this specific incident, but also in response to the ever-changing security landscape.

WHAT YOU CAN DO

Shortly after discovering this issue, we reset all valid passwords to the AgencyMatrix application. As best practice, we recommend that you change all passwords that may have been identical or similar to the password(s) used to access the AgencyMatrix application. We also recommend creating strong passwords for all of your online accounts, changing them frequently, and refraining from using the same password for multiple websites.

Although we have no evidence of actual misuse of any of your information, we are notifying you out of an abundance of caution. To help relieve concerns and restore confidence following this incident, we have arranged for you to enroll, at no cost to you, in a comprehensive credit monitoring and identity protection service for one (1) year provided by TransUnion Interactive, a subsidiary of TransUnion®, one of the three nationwide credit reporting companies. You may sign up for this service by following the instructions attached to this notice.

Please also review the enclosed “Other Important Information” document included with this letter for further steps you can take to protect your information, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file.

FOR MORE INFORMATION

For further information and assistance, please call our dedicated incident response line at [TELEPHONE NUMBER] between [TIME] a.m. - [TIME] p.m. Central Time, Monday through Friday.

Sincerely,

Insurance Technologies Corporation

OTHER IMPORTANT INFORMATION

We recommend that you remain vigilant for incidents of fraud and identity theft by reviewing your account statements and monitoring your credit reports for unauthorized activity. If you discover any suspicious or unusual activity on your accounts, you should promptly notify the financial institution or company with which your account is maintained.

Free Credit Report. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the nationwide credit reporting agencies. To order your annual free credit report please visit www.annualcreditreport.com or call toll free at **1-877-322-8228**. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's (FTC) website at www.consumer.ftc.gov) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. Contact information for the national credit reporting agencies for the purpose of requesting a copy of your credit report and other general inquiries is provided below:

- **Equifax**, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- **Experian**, PO Box 2104, Allen, TX 75013, www.experian.com, 1-888-397-3742
- **TransUnion**, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-888-4213
- **Innovis**, PO Box 1689, Pittsburgh, PA 15230-1689, www.innovis.com, 1-800-540-2505

Fraud Alert. You have the right to place an initial or extended "fraud alert" on your file at no cost by contacting any of the nationwide credit reporting agencies. Contact information for the national credit reporting agencies for the purposes of placing a fraud alert on your file is provided below. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert displayed on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. For this reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. If you are a victim of identity theft and have filed an identity theft report with law enforcement, you may want to consider placing an extended fraud alert, which lasts for 7 years, on your credit file.

- **Equifax**, PO Box 105069, Atlanta, GA 30348-5069, www.equifax.com/personal/credit-report-services/credit-fraud-alerts, 1-800-525-6285
- **Experian**, PO Box 9554, Allen, TX 75013, www.experian.com/fraud/center.html, 1-888-397-3742
- **TransUnion**, PO Box 2000, Chester, PA 19016, www.transunion.com/fraud-alerts, 1-800-680-7289
- **Innovis Consumer Assistance**, PO Box 26, Pittsburgh, PA 15230-0026, <https://www.innovis.com/personal/fraudActiveDutyAlerts>, 1-800-540-2505

Security Freeze. You have the right to place, lift, or remove a "security freeze" on your credit report, free of charge. 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. Under federal law, you cannot be charged to place, lift, or remove a security freeze.

You must place your request for a freeze separately with each of the consumer reporting agencies. To place a security freeze on your credit report, you may do so by contacting each of the consumer reporting agencies through the contact information below:

- **Equifax**, PO Box 105788, Atlanta, GA 30348-5788, www.equifax.com/personal/credit-report-services/credit-freeze, 1-800-298-0045
- **Experian**, PO Box 9554, Allen, TX 75013, www.experian.com/freeze/center.html, 1-888-397-3742
- **TransUnion**, PO Box 160, Woodlyn, PA 19094, www.transunion.com/credit-freeze, 1-888-909-8872
- **Innovis**, PO Box 26, Pittsburgh, PA 15230-0026, www.innovis.com/personal/securityFreeze, 1-800-540-2505

In order to request a security freeze, you will need to provide some or all of the following information to the credit reporting agency, depending on whether you do so online, by phone, or by mail (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. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

The credit reporting agencies have 1 business day after receiving your request by toll-free telephone or secure electronic means, or up to 3 business days after receiving your request by mail, to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within 5 business days and may provide you with a unique personal identification number (PIN) or password (or both) that can be used by you to authorize the removal or lifting of the security freeze. It is important to maintain this PIN/password in a secure place, as you will need it to lift or remove the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, or to lift a security freeze for a specified period of time, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit

reporting agency, or by sending a written request via regular, certified, or overnight mail to the credit reporting agencies and include proper identification (name, address, and Social Security number) and the PIN or password provided to you when you placed the security freeze as well as the identity of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have 1 business day after receiving your request by toll-free telephone or secure electronic means, or 3 business days after receiving your request by mail, to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must submit a request through a toll-free telephone number, a secure electronic means maintained by a credit reporting agency, or by sending a written request via regular, certified, or overnight mail to each of the credit bureaus and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have 1 business day after receiving your request by toll-free telephone or secure electronic means, or 3 business days after receiving your request by mail, to remove the security freeze.

Federal Trade Commission and State Attorneys General Offices. 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 FTC, proper law enforcement authorities and/or your state attorney general. You may also contact these agencies for information on how to prevent or avoid identity theft and to obtain additional information about fraud alerts and security freezes. You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (438-4338).

- **For California Residents:** You may also wish to review the information provided by the California Attorney General at <https://oag.ca.gov/idtheft>.
- **For Iowa Residents:** You are advised to report suspected incidents of identity theft to law enforcement or the Iowa Attorney General's Office at Office of the Attorney General of Iowa, Consumer Protection Division, Hoover State Office Building, 1305 East Walnut Street, Des Moines, IA 50319, www.iowaattorneygeneral.gov, Telephone: 1-515-281-5926 or 1-888-777-4590.
- **For Maryland Residents:** You may obtain information about avoiding identity theft from the Maryland Attorney General's Office: Office of the Attorney General of Maryland, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, <https://www.marylandattorneygeneral.gov/Pages/IdentityTheft/default.aspx>, Telephone: 1-410-576-6491 or 1-888-743-0023.
- **For New Mexico Residents:** You have rights pursuant to the Fair Credit Reporting Act ("FCRA"), such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the FCRA, the 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 credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the FCRA not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the FCRA. We encourage you to review your rights pursuant to the FCRA by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response 30-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.
- **For New York Residents:** You may obtain additional information about security breach response and identity theft prevention and protection from the New York State Office of the Attorney General at <https://ag.ny.gov/> or by calling 1-800-771-7755; the New York State Police at <http://troopers.ny.gov/> or by calling 1-518-457-6721; and/or the New York Department of State at <https://www.dos.ny.gov> or by calling 1-800-697-1220.
- **For North Carolina Residents:** You may obtain additional information about preventing identity theft provided by the North Carolina Attorney General at <https://ncdoj.gov/protecting-consumers/identity-theft/>, by calling 1-877-566-7226, or writing to 9001 Mail Service Center, Raleigh, NC 27699.
- **For Oregon Residents:** You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General at <https://doj.state.or.us>, by calling (877) 877-9392, or writing to Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096.
- **For Rhode Island Residents:** You may contact the Rhode Island Attorney General at <http://www.riag.ri.gov>, by calling 401-274-4400, or by writing to 150 South Main Street, Providence, RI 02903. The total number of Rhode Island resident(s) potentially impacted by this incident is currently unknown. You have the right to file and obtain a copy of any police report. You also have the right to request a security freeze as described above.

Enroll in Credit Monitoring/Identity Restoration Services. As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*myTrueIdentity*) for one year provided by TransUnion Interactive, a subsidiary of TransUnion® one of the three nationwide credit reporting companies. You may sign up for this service online or via U.S. mail delivery.

- To enroll in this service, go to the *myTrueIdentity* website at www.MyTrueIdentity.com and, in the space referenced as "Enter Activation Code," enter the 12-letter Activation Code <<Insert Unique 12-letter Activation Code>> and follow the three steps to receive your credit monitoring service online within minutes.

- If you do not have access to the Internet and wish to enroll in a similar offline, paper-based credit monitoring service, via U.S. mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the six-digit telephone passcode <<**Insert static 6-digit Telephone Pass Code**>> and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.
- You can sign up for the online or offline credit monitoring service anytime between now and <<**Enrollment Deadline**>>. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH COMPLIMENTARY CREDIT MONITORING SERVICE:

- Once you are enrolled, you will be able to obtain one year of unlimited access to your TransUnion credit report and credit score.
- The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, changes of address, and more.
- The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)