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August 1, 2023

Brenna Bird, Attorney General of Iowa
Consumer Protection Division
Hoover State Office Building
1305 E. Walnut Street
Des Moines, Iowa 50319-0106
consumer@ag.iowa.gov

Re: Notice of Security Incident Affecting Progressive Casualty Insurance Company and Its Affiliated Insurance Companies

Dear Attorney General Bird,

We write on behalf of Progressive Casualty Insurance Company and its affiliated insurance companies (collectively, “Progressive”) regarding a security incident involving a third-party service provider.

On May 19, 2023, we received written notification from one of our third-party service providers regarding an incident involving some of its call center representatives. We subsequently learned that some of the third-party service provider’s employees improperly shared their Progressive access credentials with unauthorized individuals who performed the employees’ call center job duties. This gave the unauthorized individuals access to certain personal information for some of our customers. Based on information from the third-party service provider, the earliest date of employment of any of the potentially involved employees by the third-party service provider was May 2021, but most were hired during or after the fall of 2022.

In response, Progressive blocked access to its systems by the unauthorized individuals identified by the third-party service provider, launched a comprehensive investigation and undertook an extensive analysis to determine what customer information the unauthorized individuals may have accessed. Once the third-party service provider became aware of the issue, it promptly notified Progressive and informed us that it took steps to block unauthorized access and conducted an extensive investigation. Law enforcement was notified. The third-party service provider informed us it has not identified any evidence at this time that would indicate that the unauthorized individuals used their positions or their work as part of an effort to commit identity theft. Progressive also is working with its third-party service providers to help protect against similar incidents in the future.

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Based on the investigations, Progressive determined that some individuals' personal information may have been visible to the unauthorized individual(s), including first and last name; date of birth; driver's license number; email address; and phone number. For a small percentage of individuals, Account Number, Routing Number, and Financial Institution Name and/or Credit/Debit Card Number, and Expiration Date may have been visible. For a much smaller group of individuals, Social Security Numbers may have been visible.

Although Progressive's data analysis is ongoing, on August 1, 2023 Progressive will begin mailing notifications to the individuals it has identified to date and offering them 24 months of Experian's credit monitoring and identity theft restoration services. Because our data analysis remains ongoing, we have not yet been able to determine the final number of state residents affected. To date, we have identified approximately 4,309 Iowa residents who may have been affected by the incident. As our analysis progresses, we will keep your office informed if we identify additional state residents.

An unaddressed copy of the individual letter is attached. Progressive has also established a call center to answer individuals' questions ((833)-312-0815).

Progressive remains committed to protecting its customers' personal information and assisting those who may have been affected by this incident. Progressive is providing notices to individuals pursuant to applicable state laws and regulations. By virtue of this notice, Progressive does not waive any rights and reserves all rights under such laws. Please do not hesitate to contact me if you have any questions regarding this letter.

Very truly yours,



Phyllis B. Sumner

Enclosure



Return Mail Processing
PO Box 999
Suwanee, GA 30024

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SAMPLE A. SAMPLE - L05

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



August 1, 2023

NOTICE OF SECURITY INCIDENT

Dear Sample A. Sample,

At Progressive, we take protecting your personal information very seriously and regret to inform you that a recent security incident may have affected the privacy of some of your information. We want you to understand what happened and the steps we've taken to address the situation. This letter includes instructions for enrolling in complimentary credit monitoring and identity restoration services and steps you can take to protect your personal information.

What Happened

To help handle the volume of customer calls Progressive receives, we use third-party call center providers at times. On May 19, 2023, we received written notification from one of our third-party service providers regarding an incident involving some of its call center representatives. We subsequently learned that some of the third-party service provider's employees improperly shared their Progressive access credentials with unauthorized individuals who performed the employees' call center job duties. This gave the unauthorized individuals access to certain personal information for some of our customers. Based on information from the third-party service provider, the earliest date of employment of any of the potentially involved employees by the third-party service provider was May 2021, but most were hired during or after the fall of 2022.

Upon discovery, Progressive launched a comprehensive investigation and extensive analysis to determine what customer information the unauthorized individuals may have accessed. The third-party service provider informed us that it also conducted an extensive investigation and notified law enforcement.

What Information Was Involved

Based on the investigations, we determined that some of your personal information may have been visible to the unauthorized individual(s), including your name, address, driver's license number, email address, phone number, [Extra1], [Extra2], [Extra3], and date of birth.

What We Are Doing

Once the third-party service provider became aware of the issue, it and Progressive promptly took steps to block the unauthorized access. Progressive also is working with its third-party service providers to help protect against similar incidents in the future.

The third-party service provider informed us it has not identified any evidence at this time that would indicate that the unauthorized individuals used their positions or their work as part of an effort to commit identity theft. However, we want you to feel secure. As a precaution and to help protect your identity, we have secured the services of Experian to provide credit and identity monitoring at no cost to you, as described in this letter.

What You Can Do

The “Additional Resources” section below describes additional steps you can take to help protect your information. It includes recommendations from 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.

On behalf of Progressive, we apologize for any inconvenience or concern this may have caused. We appreciate your business. If you have any questions concerning this incident, please contact 833-312-0815 from Monday through Friday 8 am - 10 pm CST, Saturday and Sunday 10 am - 7 pm CST (excluding major U.S. holidays).

Sincerely,

The Progressive Group of Insurance Companies

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for 24 months.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for 24 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 24-month membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** November 30, 2023 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code: ABCDEFGHI**

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 833-312-0815 by November 30, 2023. Be prepared to provide engagement number B100109 as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

ADDITIONAL RESOURCES

Order Your Free Credit Report: To order your free annual credit report, visit www.annualcreditreport.com, call toll-free at (877) 322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's (FTC) website at www.ftc.gov and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

The three credit bureaus (Equifax, Experian, and TransUnion) provide free annual credit reports only through the website, toll-free number, or request form. You may also purchase a copy of your credit report by contacting any of the credit reporting agencies below:

Equifax	www.equifax.com	(800) 685-1111
Experian	www.experian.com	(888) 397-3742
TransUnion	www.transunion.com	(800) 916-8800

Upon receiving your credit report, review it carefully. Errors may be a warning sign of possible identity theft. Here are a few tips of what to look for:

- Look for accounts you did not open.
- Look in the "inquiries" section for names of creditors from whom you have not requested credit. Some companies bill under names other than their store or commercial names; the credit bureau will be able to tell if this is the case.
- Look in the "personal information" section for any inaccuracies in information (such as home address and Social Security Number).

If you see anything you do not understand, call the credit bureau at the telephone number on the report. You should notify the credit bureaus of any inaccuracies in your report, whether due to error or fraud, as soon as possible so the information can be investigated and, if found to be in error, corrected. If there are accounts or charges you did not authorize, immediately notify the appropriate credit bureau by telephone and in writing. Information that cannot be explained should also be reported to your local police or sheriff's office because it may signal criminal activity.

We encourage you to take advantage of these protections and remain vigilant for incidents of fraud and identity theft, including regularly reviewing and monitoring your credit reports and account statements.

Federal Trade Commission and State Attorneys General Offices: If you detect any unauthorized transactions in any of your financial accounts, promptly notify the appropriate payment card company or financial institution. If you detect any incidence of identity theft or fraud, promptly report the matter to your local law enforcement authorities (from whom you can obtain a police report), state Attorney General, and the Federal Trade Commission (FTC). You can contact the FTC to learn more about how to protect yourself from becoming a victim of identity theft by using the contact information below:

Federal Trade Commission Bureau of Consumer Protection
600 Pennsylvania Avenue NW Washington, DC 20580
(877) IDTHEFT (438-4338)
www.ftc.gov/idtheft

For Colorado and Georgia residents: You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

For District of Columbia residents: The District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; 202-727-3400; and oag.dc.gov.

For Maryland residents: The Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

For New Mexico residents: Consumers have rights pursuant to the Fair Credit Reporting Act (FCRA), such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their 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 consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their rights pursuant to the FCRA by visiting www.consumerfinance.gov/f/201504_cfpb_summary_yourrights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For New York residents: The Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <https://ag.ny.gov/>.

For North Carolina residents: You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov, 1-877-566-7226.

Reporting of identity theft and obtaining a police report:

For Iowa residents: You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

For Rhode Island residents:

File or Obtain a Police Report: For security incidents generally, you have the right to file or obtain a copy of a police report.

Attorney General: You may obtain information about avoiding identity theft at:

Office of the State of Rhode Island Attorney General
 150 South Main Street
 Providence, Rhode Island 02903
 (401) 274-4400
www.riag.ri.gov

Placing a Security Freeze

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. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit.

You can place, temporarily lift, or permanently remove a security freeze on your credit report online, by phone, or by mail. You will need to provide certain personal information, such as address, date of birth, and Social Security number to request a security freeze and may be provided 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. Information on how to place a security freeze with the credit reporting agencies is also contained in the links below:

- <https://www.equifax.com/personal/credit-report-services/>
- <https://www.experian.com/freeze/center.html>
- <https://www.transunion.com/credit-freeze>

As of June 30, 2023, the reporting agencies allow you to place a credit freeze through the online, physical mail and phone numbers and request that you provide the information listed below. Where possible, please consult the websites listed above for the most up-to-date instructions.

Reporting Agency	Online	Physical Mail	Phone Number
Equifax	<p>Freeze request may be submitted via your myEquifax account, which you can create here:</p> <p>https://my.equifax.com/consumer-registration/UCSC/#/personal-info</p>	<p>Mail the Equifax Freeze Request Form to:</p> <p>Equifax Information Services LLC</p> <p>P.O. Box 105788</p> <p>Atlanta, GA 30348-5788</p> <p>Form may be found here: https://assets.equifax.com/assets/personal/Security_Freeze_Request_Form.pdf</p>	888-298-0045

<p>Experian</p>	<p>Freeze request may be submitted here:</p> <p>https://www.experian.com/nca/online/freeze</p>	<p>Mail the request to:</p> <p>Experian Security Freeze, P.O. Box 9554, Allen, TX 75013</p> <p>Request must include:</p> <ul style="list-style-type: none"> • Full Name • Social security number • Complete address for last 2 years • Date of birth • One copy of a government issued identification card, such as a driver's license, state ID card, etc. • One copy of a utility bill, bank or insurance statement, etc. 	<p>888-397-3742</p>
<p>TransUnion</p>	<p>Freeze request may be submitted via your TransUnion account, which you can create here:</p> <p>https://service.transunion.com/dss/orderStep1_form.page?</p>	<p>Mail the request to:</p> <p>TransUnion P.O. Box 160 Woodlyn, PA 19094</p> <p>Request must include:</p> <ul style="list-style-type: none"> • Full Name • Social security number • Complete address 	<p>888-909-8872</p>

Fees associated with placing, temporarily lifting, or permanently removing a security freeze no longer apply at nationwide consumer reporting agencies.

Placing a Fraud Alert

To protect yourself from possible identity theft, you have the right to place an initial or extended fraud alert on your credit file at no cost. An initial fraud alert is a one-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. You may obtain additional information from the FTC and the credit reporting agencies listed above about placing a fraud alert and/or security freeze on your credit report.