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June 24, 2019

VIA ELECTRONIC SUBMISSION

Attorney General Wayne Stenehjem
Office of the Attorney General
Consumer Protection & Antitrust
1050 East Interstate Avenue, Suite 200
Bismarck, ND 58503-5574
Email: ndag@nd.gov

Re: Notification of Data Security Incident

Dear Attorney General Stenehjem:

We represent Ifficient, Inc. ("Ifficient") in connection with a recent data security incident, which is described in greater detail below. Ifficient is a technology-based marketing company headquartered in Denver, Colorado.

1. Nature of the security incident.

On May 7, 2019, Ifficient discovered that an unauthorized individual may have gained access to an Ifficient database. The database at issue may have contained individuals' names, addresses, phone numbers, email addresses, genders, and dates of birth. As soon as Ifficient discovered the potential incident, Ifficient conducted an investigation to determine what happened and whether personal information was impacted. Ifficient has no evidence that any of the data stored on the database was misused and notified potentially impacted individuals out of an abundance of caution.

2. Number of North Dakota residents affected.

Ifficient notified 12,627 North Dakota residents regarding this incident. Notification letters were mailed between June 17, 2019 and June 24, 2019. A sample copy of the letter is enclosed.

3. Steps taken relating to the incident.

Ifficient has taken steps in response to this incident to enhance the security of personal information in its possession – including hiring a security expert, encrypting certain data at rest, and implementing periodic infrastructure security audits, among other security enhancements – in an effort to prevent similar incidents from occurring in the future. In addition, Ifficient has offered affected individuals 12 months of complimentary cyber monitoring and fraud assistance through CyberScout, LLC.

4. Contact information.

Efficient remains dedicated to protecting the personal information in its control. If you have any questions or need additional information, please do not hesitate to contact me at (720) 292-2052, or by e-mail at Alyssa.Watzman@lewisbrisbois.com.

Best regards,

A handwritten signature in black ink that reads "Alyssa" followed by a stylized monogram "WA" and a long horizontal flourish.

Alyssa Watzman
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure

Name
Address
Address 2
City State Zip



<<Date>>

<<Name 1>> <<Name 2>>

<<Address 1>>

<<Address 2>>

<<City>>, <<State>> <<Zip>>

Subject: Notification of Data Security Incident

Dear <<Name1>> <<Name 2>>:

I am writing to inform you of a data security incident that may have affected your personal information. At Ifficient, we take the privacy and security of all personal information within our control very seriously. That is why we are providing you with information about this incident and about steps that you can take to help protect your personal information.

What Happened? On May 7, 2019, we learned that an unauthorized individual may have gained access to an Ifficient database. Upon receiving this information, we immediately began an investigation to determine what happened and whether personal information had been impacted. We also engaged cybersecurity experts to assist us in analyzing and fulfilling any resulting obligations.

We have no reason to believe that any of the information stored within the potentially impacted Ifficient database has been misused. Nonetheless, out of an abundance of caution, we are notifying you of this incident and providing you with information about steps that you can take to help protect your personal information.

What Information Was Involved? The potentially impacted Ifficient database contained your name, address, telephone number, email address, gender, and date of birth. As stated above, we are not aware of any evidence that this information has been misused.

What Are We Doing? As soon as we discovered this incident, we took the steps described above. We also worked to secure the potentially impacted Ifficient database and took additional steps to reduce the risk of a similar incident from occurring in the future. In addition, as a precautionary measure and to safeguard your information from any potential misuse, we are offering Cyber Monitoring services at no charge. The cyber monitoring will review the dark web and alert you if your personally identifiable information is found online. In addition, we are providing you with proactive fraud assistance to help with any questions that you might have or in event that you become a victim of fraud. These services will be provided by CyberScout, a company that specializes in identity theft education and resolution.

How do I enroll for the free services? To enroll in Cyber Monitoring services at no charge, please log on to <https://www.myidmanager.com> and follow the instructions provided. When prompted please provide the following unique code to receive services: <CODE HERE.>

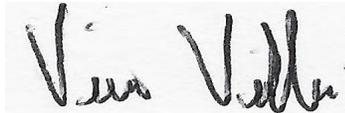
For guidance with the CyberScout services, or to obtain additional information about these services, please call the CyberScout help line at 888-312-6883 and supply the fraud specialist with your unique code. You will have until September 30, 2019 to enroll in the Cyber Monitoring service.

What You Can Do: We encourage you to enroll in the complimentary Cyber Monitoring service being offered. You can also follow the recommendations on the following pages to help protect your personal information.

For More Information: Further information about how to protect your personal information appears on the following page. If you have questions or need assistance, please do not hesitate to call 888-312-6883, Monday through Friday, 9:00 a.m. to 5:00 p.m. Mountain Time.

We sincerely regret any inconvenience or concern that this matter may cause you and remain dedicated to protecting all information in our systems.

Sincerely,

A handwritten signature in black ink that reads "Vince Villani". The signature is written in a cursive style with a large, prominent "V" at the beginning.

Vince Villani
Efficient

STEPS YOU CAN TAKE TO FURTHER PROTECT YOUR INFORMATION

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant and review your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You should also promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (the “FTC”).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can also contact one of the following three national credit reporting agencies:

Equifax P.O. Box 105851 Atlanta, GA 30348 1-800-525-6285 www.equifax.com	Experian P.O. Box 9532 Allen, TX 75013 1-888-397-3742 www.experian.com	TransUnion P.O. Box 1000 Chester, PA 19016 1-877-322-8228 www.transunion.com	Free Annual Report P.O. Box 105281 Atlanta, GA 30348 1-877-322-8228 www.annualcreditreport.com
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Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: Under U.S. law, you have the right to put a security freeze on your credit file at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. If you request a freeze online or by phone, the agency must place the freeze within one business day. If you request a lift of the freeze, the agency must lift it within one hour. You can also lift the freeze temporarily without a fee. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state. Residents of Maryland, North Carolina, and Rhode Island can obtain more information from their Attorneys General using the contact information below.

Federal Trade Commission 600 Pennsylvania Ave, NW Washington, DC 20580 consumer.ftc.gov, and www.ftc.gov/idtheft 1-877-438-4338	Maryland Attorney General 200 St. Paul Place Baltimore, MD 21202 oag.state.md.us 1-888-743-0023	North Carolina Attorney General 9001 Mail Service Center Raleigh, NC 27699 ncdoj.gov 1-877-566-7226	Rhode Island Attorney General 150 South Main Street Providence, RI 02903 http://www.riag.ri.gov 401-274-4400
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You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include knowing what is in your file; disputing incomplete or inaccurate information; and requiring consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.