



MULLEN
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December 23, 2019

INTENDED FOR ADDRESSEE ONLY

VIA E-MAIL

Office of the Attorney General
Consumer Protection and Antitrust
Gateway Professional Center
1050 E Interstate Avenue Suite 200
Bismarck, ND 58503-5574
E-mail: ndag@nd.gov

Re: Notice of Data Event

Dear Sir or Madam:

We represent Veracity Insurance Solutions (“Veracity”) located at 260 S 2500 W #303, Pleasant Grove, UT 84062 and are writing to notify your office of an incident that may affect the security of personal information relating to certain individuals. The investigation into this matter is ongoing, and this notice may be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Veracity does not waive any rights or defenses regarding the applicability of North Dakota law or personal jurisdiction.

Nature of the Data Event

On September 19, 2019, Veracity became aware of unusual activity related to an employee’s email account. Veracity immediately launched an investigation, with the support of forensic investigators, to determine the nature and scope of the activity. On October 4, Veracity’s investigation determined that there was unauthorized access to the employee’s email account. Veracity undertook a lengthy and labor-intensive process to identify the personal information contained in the affected email account. Although Veracity has no evidence of misuse of the information as a result of this incident, we are providing notice in an abundance of caution to individuals whose information was present in the impacted email account.

The information contained in the impacted email account includes name, address, credit card number, expiration date, and CVV. The information contained in the affected email account varied for each individual.

Notice to North Dakota Resident

On or about December 23, 2019, Veracity provided written notice of this incident to all affected individuals, which includes one (1) North Dakota resident. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, Veracity moved quickly to investigate and respond to the incident, assess the security of Veracity systems, and notify potentially affected individuals. Veracity is also working to implement additional safeguards and training to its employees. Veracity is providing access to credit monitoring services for one (1) year, through Kroll, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Veracity is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Veracity is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4766.

Very truly yours,



Brian F. Fox of
MULLEN COUGHLIN LLC

EXHIBIT A



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country >>

Re: Notice of Data Privacy Event

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>,

Veracity Insurance Solutions (“Veracity”) writes to notify you of an incident that may affect the security of some of your personal information. We take this incident very seriously, and this letter provides details of the incident, our response, and steps you may take to help protect against the possible misuse of your information, should you feel it appropriate to do so.

What Happened? On September 19, 2019, Veracity became aware of unusual activity related to an employee’s email account. Veracity immediately launched an investigation, with the support of forensic investigators, to determine the nature and scope of the activity. On October 4, 2019, Veracity’s investigation determined that there was unauthorized access to the employee’s email account. Veracity undertook a lengthy and labor-intensive process to identify the personal information contained in the affected email account. Although Veracity has no evidence of actual misuse of the information as a result of this incident, we are notifying you in an abundance of caution because your information was present in the impacted email account.

What Information Was Involved? On November 27, 2019, Veracity determined that the following information related to you was in the affected email account at the time of the incident: name and <<b2b_text_1(Impacted Data)>>.

What We Are Doing. Information privacy and security are among our highest priorities. Upon discovery, we immediately commenced an investigation to confirm the nature and scope of the incident. We are taking steps to implement additional safeguards and review policies and procedures relating to data privacy and security. We are notifying regulators of this incident, as required.

While we have no evidence of access to your personal information, Veracity is providing you with access to twelve (12) months of credit monitoring and identity protection services from Kroll at no cost to you. A description of services and instructions on how to enroll can be found within the enclosed *Steps You Can Take to Help Protect Your Personal Information*. Please note that you must complete the enrollment process yourself, as we are not permitted to enroll you in these services on your behalf.

What You Can Do. You may review the information contained in the enclosed *Steps You Can Take to Help Protect Your Personal Information* for guidance on how to protect your personal information. You may also enroll to receive the complimentary credit monitoring and identity protection services through Kroll. We also encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity.

For More Information We understand you may have questions about this incident that are not addressed in this letter. To ensure your questions are answered in a timely manner, we established a dedicated assistance line at 1-???-???-???? which can be reached Monday through Friday from 9:00 a.m. to 6:30 p.m. Eastern Time, excluding major U.S. national holidays.

Veracity takes the privacy and security of the personal information in our care very seriously. We sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julie', written in a cursive style.

Julie Sheffield
Vice President of Operations
Veracity Insurance Solutions

Steps You Can Take to Help Protect Your Personal Information

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit IDMonitoringURL to activate and take advantage of your identity monitoring services.

You have until Date to activate your identity monitoring services.

Membership Number: Member ID

Additional information describing your services is included with this letter.

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the 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. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Equifax Security Freeze

P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
www.freeze.equifax.com

Experian Security Freeze

P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze

TransUnion Credit Freeze

P.O. Box 2000
Chester, PA 19016
1-888-909-8872
www.transunion.com/credit-freeze

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver's license or ID card, military identification, etc.);
7. 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.

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your file at no cost. An initial fraud alert is a 1-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. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Equifax Fraud Alert

P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
www.equifax.com/personal/credit-report-services

TransUnion Fraud Alert

P.O. Box 2000
Chester, PA 19016
1-800-680-7289
<https://www.transunion.com/fraud-alerts>

Experian Fraud Alert

P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/center.html

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, 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 Fair Credit Reporting Act, 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 violators. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-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, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. [There are XXX Rhode Island residents impacted by this incident.](#)



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services¹ from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who can help you determine if it's an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator can dig deep to uncover the scope of the identity theft, and then work to resolve it.

¹ Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.