



VIA ELECTRONIC MAIL

May 12, 2021

North Dakota Office of the Attorney General

Dear Sir or Madam:

Pursuant to N.D.C.C. §51-30-02, American Family Mutual Insurance Company, S.I. (NAIC #19275) hereby provides notice to the Office of the Attorney General of the unauthorized access of personal information of North Dakota consumers.

American Family Mutual Insurance Company, S.I., American Standard Insurance Company of Wisconsin, American Family Insurance Company, and American Standard Insurance Company of Ohio (“American Family” or “we”) provide online automobile insurance quotes to consumers through the amfam.com website. To make the quoting process easier for consumers, an American Family third-party supplier prefills certain information in the online quoting form (such as driver’s license number) after a consumer enters personal information into the form.

On March 18, 2021, American Family was notified by our prefill supplier of a spike in activity on the amfam.com quoting platform between March 1, 2021 and March 7, 2021. We suspected that the spike was associated with unauthorized automated bot activity (“Incident”). In response, our Cyber-Fusion Center immediately contained the Incident by taking the platform offline on March 19, 2021. Subsequent investigation and monitoring identified excessive quote prefill orders dating back to February 6, 2021.

With respect to remediation measures, in addition to taking prefill capabilities offline, we implemented server-side masking of driver’s license numbers and dates of birth. Further, IP addresses and known attacker form submission patterns were blocked at both the firewall and Application Programming Interface (“API”) gateway, and recaptcha was implemented on the primary quoting platform for amfam.com. We are also in the process of deploying web application firewall and API security capabilities as additional control measures.

A total of approximately 283,734 unique driver’s license numbers were returned in the prefill information for all quotes that were generated during the Incident. Of that number, approximately 572 were North Dakota driver’s license numbers. These totals include driver’s license numbers that were returned in the prefill information for both valid consumer quotes where the information was provided to the actual consumer as well as fraudulent quotes where the information was accessible to the bots that generated the quotes.

Consumer notifications will be sent to affected North Dakota residents on May 13, 2021 via U.S. mail. A specimen copy of the consumer notice is enclosed with this letter. As noted above, the number of potentially affected driver’s license numbers we are reporting to you includes actual



1-800-MY AMFAM (692-6326) | amfam.com

consumers who legitimately requested quotes during the Incident. Given our historical quote volume on the amfam.com platform, we know that a percentage of the quote requests submitted during the Incident were legitimate. However, due to the complexity in verifying the validity of each quote request submitted during the Incident and our desire to ensure that everyone who could potentially have been affected by the Incident is notified, we have decided to notify all individuals whose driver's license numbers were returned in the quote prefill information during the Incident.

In addition to the remedial steps we have taken, we are offering consumers receiving the notification letter one year of credit monitoring and resolution services through CyberScout.

If you need further information about this incident, please contact Judy Zelhofer, Assistant General Counsel, at 608.242.4100 extension 36731 or jzelhofe@amfam.com.

Sincerely,

A handwritten signature in black ink, appearing to read "L. K. R.", positioned above the printed name.

Lauren Powell
Corporate Legal Vice President

Enc.

<Return Name>
<Return Address>
<City> <State> <Zip>



<FirstName> <LastName>
<Address1>
<Address2>
<City><State><Zip>

May 13, 2021

NOTICE OF DATA BREACH

We are writing to inform you of a recent data security incident involving an online auto insurance quoting platform of American Family Mutual Insurance Company, S.I. (American Family). You may have been affected by an unauthorized attempt to obtain your personal data through this quoting platform.

This letter will provide you with information about the incident and a no-cost service that American Family is making available to you to help monitor potential misuse of your personal data.

What Happened

We believe unauthorized parties may have used an automated bot process to obtain your driver's license number by entering personal information (such as your name and address) they acquired from unknown sources into the American Family quoting platform.

We are notifying you because you may have been affected by this incident. If you did not request an insurance quote using the American Family quoting platform between February 6, 2021 and March 19, 2021, the unauthorized parties may have requested a quote in your name and may have obtained your driver's license number. If, however, you did request a quote from the American Family quoting platform between February 6, 2021 and March 19, 2021, you are not impacted by this incident.

What Information Was Involved

To the extent you were affected by this incident, unauthorized parties may have obtained your driver's license number.

We have reason to believe this data may be used to fraudulently apply for unemployment benefits in your name. Please carefully review any written communications you receive from your state's unemployment agency, especially if you have not applied for unemployment benefits. If you suspect that your data has been used to fraudulently apply for unemployment benefits, you should contact the relevant state unemployment agency immediately.

What We Are Doing

We identified the unauthorized activity and immediately took action to address it. We blocked the activity and worked to notify potentially affected consumers. We take our responsibility to safeguard personal information seriously and we have enhanced our security controls to help prevent this type of incident from reoccurring.

To help protect you, we are offering you **Single Bureau Credit Monitoring*** services free of charge. These services from Cyberscout, an independent outside firm, will provide you with alerts for twelve months from the date of enrollment whenever changes occur to your Experian credit file. The alert is sent to you the same day that the change or update takes place with the credit bureau. To enroll in these services, please log on to <https://secure.identityforce.com/benefit/amfam> and follow the online instructions. When prompted, please provide the following unique code to receive services:

<CODE HERE>

Important – You must register your account and activate your monitoring services within 90 days from the date of this letter, otherwise your ability to access the services will expire.

There was no delay in providing you this notification as a result of a law enforcement investigation.

What You Can Do

If you wish to monitor your own credit report for 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 agencies: Equifax, Experian and TransUnion. To order your annual free credit report please visit www.annualcreditreport.com or call toll free at (877) 322-8228.

Additional information on identify theft protection is also provided in the enclosed pages entitled “Information About Identity Theft Protection.”

For More Information

We take the security and privacy of your information very seriously and apologize for any inconvenience this incident may have caused. If you have any questions or concerns regarding this matter, please contact Cyberscout at 1-855-535-1805, from 9:00 am to 9:00 pm Eastern time Monday through Friday.

Sincerely,

Chris Szafranski

Privacy Director

American Family Mutual Insurance Company, S.I.

* Services require an internet connection and email account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

Information about Identity Theft Protection

Review Accounts and Credit Reports:

It is recommended that you remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring your credit report for 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 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.

Carefully review your account statements and credit reports, and promptly report any suspicious activity or suspected identity theft to the proper law enforcement authorities, including local law enforcement, your state's attorney general, and/or the Federal Trade Commission ("FTC"). You may contact the FTC or your state's regulatory authority to obtain additional information about avoiding and protection against identity theft: Federal Trade Commission, Consumer Response Center 600 Pennsylvania Avenue, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft.

You may also obtain information about preventing and avoiding identity theft from the Attorney General.

For residents of Maryland: Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us.

For residents of North Carolina: North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, www.ncdoj.gov.

For residents of Rhode Island: Rhode Island Office of the Attorney General, Consumer Protection Unit, 150 South Main Street, Providence, RI 02903, 401-274-4400, <http://www.riag.ri.gov>.

For residents of District of Columbia: District of Columbia Office of the Attorney General, 400 6th Street, NW, Washington, DC 20001, 202-727-3400, <https://oag.dc.gov/>.

For residents New York: New York Department of State Division of Consumer Protection: <http://dos.ny.gov/consumer-protection> and NYS Attorney General at: <http://www.ag.ny.gov/home.html>.

For other states: Information on how to contact your state attorney general may be found at www.naag.org/naag/attorneys-general/whos-my-ag.php.

If you are a resident of Massachusetts or Rhode Island, note that pursuant to those states' laws, you have a right to obtain a police report relating to this incident, and if you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

Additional Information for New Mexico Residents: Here is a summary of your major rights under the FCRA:

- You have the right to be told if information in your file has been used against you;
- You have the right to receive a copy of your credit report and the right to ask for a credit score;
- You have the right to dispute incomplete or inaccurate information;
- You have the right to dispute inaccurate, incomplete, or unverifiable information;
- You have the right to have outdated negative information removed from your credit file;
- You have the right to limit access to your credit file;
- You have the right to limit "prescreened" offers of credit and insurance you get based on information in your credit report;
- You have the right to seek damages from violators; and
- You have the right to place a "security freeze" on your credit report.

Credit Freezes:

You have a right to place a freeze on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. There is no fee for a credit freeze. The 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 credit freeze to control 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.

A credit freeze does not apply to a person or entity, or its affiliates, or collection agencies acting on behalf of the person or entity, with which you have an existing account that requests information in your credit report for the purposes of reviewing or collecting the account. Reviewing the account includes activities related to account maintenance, monitoring, credit line increases, and account upgrades and enhancements.

You must separately place a credit freeze on your credit file at each credit reporting agency. Please contact the three major credit reporting companies as specified below to find out more information about placing a freeze on your credit report. If you request a credit freeze online or by phone, the credit reporting agencies have one (1) business day after receiving your request to place the freeze on your credit file report. If you request a lift of the credit freeze online or by phone, then the credit reporting agency must lift the freeze within one (1) hour. If you request a credit freeze or lift of a credit freeze by mail, then the credit agency must place or lift the credit freeze no later than three (3) business days after receiving your request.

To request a credit 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 years, provide the addresses where you have lived over the prior five years
5. Proof of current address such as currently utility bill or telephone bill
6. Other personal information as required by the applicable credit reporting agency

Fraud Alerts:

As an alternative to a credit freeze, 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 (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 (7) years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies at the addresses or toll-free numbers listed at the bottom of this page.

For more information, including information about additional rights, you can visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>, <https://www.consumerfinance.gov/learnmore/>, or write to:

Consumer Financial Protection Bureau
1700 G Street N.W.
Washington, DC 20552.

You can obtain more information about fraud alerts and credit freezes by contacting the FTC or one of the national credit reporting agencies listed below.

<p>EQUIFAX P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 www.equifax.com</p>	<p>EXPERIAN Consumer Fraud Assistance P.O. Box 9554 Allen, TX 75013 888-397-3742 www.experian.com</p>	<p>TRANSUNION P.O. Box 2000 Chester, PA 19016-2000 Phone: 800-909-8872 www.transunion.com</p>
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