



Insurance & Risk Management

C/O ID Experts  
10300 SW Greenburg Rd. Suite 570  
Portland, OR 97223

To Enroll, Please Call:  
1-800-939-4170  
Or Visit:  
<https://app.myidcare.com/account-creation/protect>  
Enrollment Code: <<XXXXXXXXXX>>

<<First Name>> <<Last Name>>  
<<Address1>> <<Address2>>  
<<City>>, <<State>> <<Zip>>

October 14, 2019

## Re: Notice of Data Event

Dear <<First Name>> <<Last Name>>:

The Crichton Group (“Crichton”) writes to inform you of a data privacy incident that may have involved some of your personal information. While we are unaware of any attempted or actual misuse of your data, we are providing you with information about the event, our response, and steps you may take to better protect against the possible misuse of your information, should you feel it appropriate to do so. We have your information because we provide insurance brokerage services, or provided a proposal, to your current or former employer, <<Variable Data 1: Company>>.

**What Happened?** In November 2018, Crichton became aware of unusual activity on certain systems. We immediately took steps to investigate this activity and determined that our organization was the target of a malware attack that was impacting certain parts of the network. We immediately began working with third party forensic investigators to remediate the network and to confirm the nature and scope of the incident.

On or around December 11, 2018, we determined that the investigation could not forensically rule out unauthorized acquisition of data in certain employee email accounts based on the malware involved. Additionally, on or around December 21, 2018, the investigation determined that certain employee email accounts may have been accessed by an unauthorized actor using compromised credentials. Because the investigation was unable to rule out access to data in the affected email accounts, Crichton commenced an extensive review of all of the data in the potentially affected emails to determine what records were present and to whom those records relate.

Crichton receives data from its customers in furtherance of the insurance brokerage services it offers. Therefore, once the review of the emails was complete, we worked diligently to determine from which customers we received the records present in the affected emails, and to make the relevant customers aware of this incident. Crichton then worked with the relevant customers to determine contact information for those individuals whose data was determined to be present in the affected emails. Based on our investigation, we determined your information was present in the emails that may have been subject to unauthorized access.

**What Information Was Involved?** Based on the investigation, it was determined that the personal information that was potentially accessed may have included your: <<Variable Data 2>>. To date, we have not received any reports of actual or attempted misuse of personal information potentially affected by this incident.

**What We Are Doing.** We take this incident and the security of personal information very seriously. Upon discovering unusual activity in our system, we immediately took steps to remediate our network and conducted an investigation to determine how this incident occurred and who may be affected. This investigation included working with third party forensic experts to confirm the nature and scope of the incident. Additionally, while we have safeguards in place to protect data in our care, we are working to review and enhance these protections as part of our ongoing commitment to data security.

As an added precaution, we are also offering you access to twelve (12) months of credit monitoring, CyberScan monitoring and identity theft recovery MyIDCare™ services through ID Experts®, at no cost to you. More information on the MyIDCare services and instructions on enrollment may be found in the enclosed *Steps You Can Take to Protect Personal Information*.

**What You Can Do.** 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. We also encourage you to review the information in the enclosed *Steps You Can Take to Protect Personal Information* and to enroll in the identity protection services we are offering at no cost to you. You can enroll in the free MyIDCare services by calling 1-800-939-4170 or by going to <https://app.myidcare.com/account-creation/protect> and using the Enrollment Code provided above. Please note the deadline to enroll is December 14, 2019.

**For More Information.** We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at 1-800-939-4170, anytime Monday through Friday from 8 am - 7 pm Central Time or go to <https://app.myidcare.com/account-creation/protect>.

Again, we take the privacy and security of the personal information in our care seriously, and sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

*Kathryn James*

Kathryn James  
Finance Leader  
The Crichton Group

## Steps You Can Take to Protect Personal Information

### Enroll in Credit Monitoring

**1. Website and Enrollment.** Go to <https://app.myidcare.com/account-creation/protect> and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.

**2. Activate the credit monitoring** provided as part of your MyIDCare membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, MyIDCare will be able to assist you.

**3. Telephone.** Contact MyIDCare at 1-800-939-4170 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

**4. Review your credit reports.** We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to [www.annualcreditreport.com](http://www.annualcreditreport.com) or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

If you discover any suspicious items and have enrolled in MyIDCare, notify them immediately by calling or by logging into the MyIDCare website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

### Monitor Accounts

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](http://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:

#### **Experian**

PO Box 9554

Allen, TX 75013

1-888-397-3742

[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

#### **TransUnion**

P.O. Box 160

Woodlyn, PA 19094

1-888-909-8872

[www.transunion.com/credit-freeze](http://www.transunion.com/credit-freeze)

#### **Equifax**

PO Box 105788

Atlanta, GA 30348-5788

1-800-685-1111

[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

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:

**Experian**

P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/fraud/center.html](http://www.experian.com/fraud/center.html)

**TransUnion**

P.O. Box 2000  
Chester, PA 19106  
1-800-680-7289

[www.transunion.com/fraud-victim-resource/place-fraud-alert](http://www.transunion.com/fraud-victim-resource/place-fraud-alert)

**Equifax**

P.O. Box 105069  
Atlanta, GA 30348  
1-888-766-0008

[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

**Additional Information**

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](http://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 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](http://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](http://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 two Rhode Island residents impacted by this incident.