

Facsimile Cover Sheet



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Date:	January 11, 2007
To:	FAX NO: (518) 474-2474 Consumer Protection Board Security Breach Notification
From:	Barbara L. Secor
Regarding:	CONFIDENTIAL
Remarks:	If you have any questions, please give me a call. Thanks. Barb Secor

Expect pages 1 through 8 (including this cover page).

CONFIDENTIALITY NOTICE

The documents accompanying this transmission contain information belonging to the Sender which is legally privileged and confidential. The information is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any disclosure, dissemination, distribution, copying, or the taking of any action in reliance on the contents of this information is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via U.S. Postal Service. Thank you.

PLEASE SUBMIT THIS FORM TO ALL THREE (3) STATE AGENCIES as follows:

Fax this form to:

CPB:

Security Breach Notification-

Fax: 518-474-2474

NYS Office of Cyber Security and Critical Infrastructure Coordination (CSCIC):

30 South Pearl St.

Floor P2

Albany, NY 12207

Fax: 518-474-9090

and also **Fax & Mail** this form to:

Attorney General:

Asst. Attorney General in Charge

Bureau of Consumer Frauds

120 Broadway - 3rd Floor

New York, NY 10271

Fax: 212-416-6003

ATTACHMENT A to REPORTING FORM

The company was informed of an information breach in December, 2006. It was discovered when law enforcement contacted the Baltimore office of an affiliated company in our organization on December 5, 2006. Law enforcement informed the company that they had found documents during a search of a residence as part of an ongoing credit card fraud investigation. Some of the documents found contained our organization's customer personal information, which may have included some of the following elements: name, address, city and state, social security number and date of birth. One of the searches was conducted in a residence shared by a former employee of one of the affiliated companies in our organization. While employed, the former employee was authorized to access the records. So there was no unauthorized access to computerized data in this instance. However, it appears that this former employee may have wrongfully printed the customer information and disclosed it to one of the individuals charged in law enforcement's credit card fraud investigation. Law enforcement is still investigating the matter and we remain in contact with them.

We reviewed the account history of any policy or account with our organization for those individuals whose personal information was disclosed and found no indication of misuse. Any active policies or accounts of these individuals were also flagged for special handling to avert any unauthorized persons from making changes.

Our organization provided notification to customers whose names were on the evidence provided by law enforcement, even where no data elements beyond name and address were disclosed. We have sent a total of 67 letters, 2 of which were sent to New York residents. In addition, we have offered these individuals one year of credit monitoring, at our cost. A copy of the template of our notice letter is attached.

January 5, 2007

Policy/Account Number

Dear (add policyholder name)

We are sorry to inform you of an information breach involving some of your personal information. This letter explains what happened and offers you assistance in protecting against the potential for identity theft.

Documents containing personal information were discovered by law enforcement in residences being searched as part of an ongoing credit card fraud investigation. The specific personal information found by law enforcement relating to you was (insert as appropriate: your name, city and state, date of birth, policy number.....)

One of the searches was conducted in a residence shared by a former employee of ours. While employed, the former employee was authorized to access the records. If this former employee disclosed or misused the information, it would have been done in violation of company policy. Our investigation is ongoing.

(Name), we sincerely regret this incident happened because protecting your privacy and safeguarding your personal information is very important to us.. At this time we have no indication that your insurance coverage with us has been compromised in any way. Nevertheless, if you have an active policy with us, we have flagged it for special handling to prevent any unauthorized persons from making changes.

We encourage you to be vigilant and review all financial account statements. To assist you, we have contracted with Equifax Personal Solutions to provide assistance in protecting your identity through credit monitoring. We are offering you one year of credit monitoring, at our cost, through Equifax Credit Watch™ Gold . You are eligible to enroll in this service for the next 90 days, so please enroll promptly. For more information and enrollment, please see the instructions enclosed with this letter. If you choose to enroll, you will need to use the following Promotional Code: _____

Please accept our sincere apology for any inconvenience this situation causes you. If you have questions or concerns, please contact me directly at X number.

Sincerely,

Business Unit Leader
Toll free number to call the signatory

Complimentary Credit Monitoring Through Equifax Personal Solutions

To protect your identity, we recommend you follow these steps:

1. Enroll in Equifax Credit Watch™ Gold with 3-in-1 Monitoring identity theft protection service. This product is being provided to you at no cost.
2. Additionally, you may choose to adopt an increased level of protection by placing a fraud alert on your credit file at Equifax and the other two credit reporting agencies.

What is Equifax Credit Watch™ Gold with 3-in-1 monitoring

Credit Watch will provide you with an "early warning system" of changes to your credit file and help you to understand the content of your credit file at the three credit reporting agencies. The key features and benefits are listed below.

Equifax Credit Watch provides you with a 1 year membership service:

- o Comprehensive credit file monitoring of your Equifax, Experian, and TransUnion credit reports.
- o Automatic notification of key changes to your credit files from any of the three agencies.
- o Wireless alerts and customizable alerts available.
- o Free 3-in-1 Credit Report.
- o Unlimited Equifax Credit Reports™.
- o \$20,000 in identity theft protection with \$0 deductible (certain limitations and exclusions may apply).¹
- o 24 by 7 live agent Customer Service to assist you in understanding the content of your Equifax credit information, to provide personalized identity theft victim assistance and in initiating an investigation of inaccurate information.

How to enroll

Equifax has a simple Internet-based verification and enrollment process.

Visit: www.myservices.equifax.com/tri

- o Step 1 – Registration: complete the form with your contact information (name, address, telephone number, Social Security Number, date of birth, e-mail address). The information is provided in a secured environment.
- o Step 2 – Verify Your Identity: Equifax will verify your identity by asking you up to two security questions.
- o Step 3 – Order Summary: During the "check out" process, provide the following promotional code: Use the Code provided in the cover letter in the "Enter Promotion Code" box (all caps, no spaces, include dash). This code eliminates the need to provide a credit card number for payment.

¹ Identity Fraud Expense Reimbursement Master Policy underwritten by Travelers Casualty and Surety Company of America and its property casualty affiliates, Hartford, CT 06183. Coverage for all claims or losses depends on actual policy provisions. Availability of coverage can depend on our underwriting qualifications and state regulations. Coverage is not available for residents of New York. Equifax's credit monitoring products are protected by US Patent 7,208,052

- o Step 4 - Go to the Member Center – Under “Product List” select Credit Watch Gold with 3-in-1 Monitoring to access the product features.

If you want to enroll by mail

If you do not have access to the Internet or wish for any other reason to enroll in Credit Watch by Mail with 3-in-1 Monitoring instead of the online service, please fill out the attached form and fax or mail it to the number/address listed on the form. You will also need the Promotional Code to enroll. The Promotional Code is the code provided in the cover letter.

Directions for placing a Fraud Alert

A fraud alert is a consumer statement added to your credit report. This statement alerts creditors of possible fraudulent activity within your report as well as requests that they contact you prior to establishing any accounts in your name. Once the fraud alert is added to your credit report, all creditors should contact you prior to establishing any account in your name. To place a fraud alert on your Equifax credit file, you may contact their auto fraud line at 1-877-478-7625, and follow the simple prompts. Once the fraud alert has been placed with Equifax, a notification will be sent to the other two credit reporting agencies, Experian and Trans Union, on your behalf.

