

15466

July 26, 2019

RE: Unprotected Data

Dear :

Impact Partnership, LLC ("Impact") works directly with insurance advisors and insurance companies to provide and transmit, among other things, insurance applications and transmittals in order to aid in the selection of insurance and annuity products.

On June 24, 2019, Impact was notified by one of its subcontractors, a company called OneHQ, that certain insurance files were unprotected and could potentially be accessed from the internet. **We have no information indicating that any unauthorized individuals did in fact access or acquire these files, but we are providing this notice to you because your information was contained in one of the files.** The files included insurance or annuity applications and/or contracting files.

The information contained in the insurance or annuity applications and/or contracting files included information such as names, dates of birth, and in some instances, social security numbers, driver's license numbers and other ID numbers or financial account information. There were no passwords in this information. We have investigated this matter with OneHQ, and, again, **while we have no reason to believe the information was actually accessed by unauthorized individuals, we are providing this notice to you simply out of an abundance of caution, because we cannot be certain.**

As soon as it learned about the unprotected files, OneHQ immediately enabled file protection measures and rendered the files inaccessible. OneHQ also contacted Impact and verified that the files had been protected and could no longer be accessed. Finally, OneHQ had a computer security contractor verify that the files could not be viewed or accessed on the internet.

Impact is offering **FREE CREDIT MONITORING for 18 months** from Experian for you. To help protect your identity, we are offering a complimentary eighteen-month membership of Experian's® IdentityWorks<sup>SM</sup>. This product provides you with superior identity detection and resolution of identity theft. To activate your membership and start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by: [enrollment end date]** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: [URL]
- Provide your **activation code: [code]**

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at [customer service number] by **[enrollment end date]**. Be prepared to provide

July 26, 2019  
Page 2

engagement number [engagement #] as proof of eligibility for the identity restoration services by Experian. Please see the enclosed **“ADDITIONAL DETAILS REGARDING YOUR 18-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP”** for more information about this product.

If you have questions about this issue or need more information, you may contact Derrick Vermillion at Impact Partnership at 1-866-522-6813 or email at [dvermillion@impactpartner.com](mailto:dvermillion@impactpartner.com) in order to learn more information. For now, please be vigilant in watching for unauthorized credit or account activity.

You can also obtain information from the Federal Trade Commission and the three large credit reporting agencies about fraud alerts and security freezes which can be placed on your credit account. These steps can help detect and prevent identity theft. The toll-free numbers, addresses, and helpful websites for the FTC and the three credit reporting agencies are included below.

Finally, please review the state-specific attachment for other information from your state which can also be helpful in preventing or detecting identity theft or unauthorized credit activity.

Impact takes data protection seriously and regrets that this situation occurred. Please feel free to contact us if you have any questions.

Sincerely,  
Impact Partnership  
3550 George Busbee Pkwy  
Suite 450  
Kennesaw, GA 30144

July 26, 2019  
Page 3

Federal Trade Commission:

<https://www.consumer.ftc.gov/topics/identity-theft>

<https://www.consumer.ftc.gov/articles/0497-credit-freeze-faqs>

1-877-ID-THEFT (877-438-4338)

600 Pennsylvania Ave NW

Washington, DC 20580

Equifax:

<https://www.equifax.com/personal/>

Phone: 888-548-7878

1550 Peachtree St NW

Atlanta, GA 30309

TransUnion:

<https://www.transunion.com/>

Phone: 800-888-4213

555 W. Adams Street

Chicago, IL 60661

Experian:

<https://www.experian.com/>

Phone: 1-888-397-3742

475 Anton Boulevard,

Costa Mesa, CA 92626

## U.S. State Notification Requirements

### Measures All U.S. Residents Can Take to Prevent or Avoid Identity Theft

**Obtain a Free Credit Report:** We remind you that you are entitled to obtain a copy of your credit report, free of charge, once every twelve months from each of the national credit reporting agencies. You may order your free annual credit report online, by phone or by mail. To order your annual free credit report online visit [www.annualcreditreport.com](http://www.annualcreditreport.com). To order your annual free credit report by phone call 877-322-8228. To order your annual free credit report by mail you may complete an Annual Credit Report Request Form (available on the Federal Trade Commission's website [www.consumer.ftc.gov](http://www.consumer.ftc.gov)) and mail the form to Annual Credit Report Request Service P.O. Box 105281 Atlanta, GA 30348-5281.

**Place a Fraud Alert:** A fraud alert can make it harder for an identity thief to open more accounts in your name. You can place a fraud alert for free by asking one of the three nationwide credit bureaus. It has to put the alert on your credit report and tell the other two credit bureaus to do so. A fraud alert tells creditors to follow certain procedures, including contacting you, before the open new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. The alert lasts one year. More information about Fraud Alerts can be found on the FTC's website [www.consumer.ftc.gov](http://www.consumer.ftc.gov).

**Place a Security Freeze:** Also known as a credit freeze, a security freeze restricts access to your credit report, which in turn makes it more difficult for anyone to open accounts in your name. A freeze lasts until you ask the reporting agency to lift it, either temporarily or remove it altogether. A request for a security freeze must be made with each credit reporting agency individually. More information about Security Freezes can be found on the FTC's website [www.consumer.ftc.gov](http://www.consumer.ftc.gov).

**Report Identity Theft:** If you have been or if you believe you have been the victim of identity theft you should report it to the FTC, local law enforcement and your state's Attorney General or other consumer protection office. You may file a report with the FTC and obtain additional information by visiting [www.identitytheft.gov](http://www.identitytheft.gov).

**For residents of Arizona, California, Colorado, Connecticut, Hawaii, Illinois, Iowa, Maryland, Michigan, Missouri, North Carolina, Oregon, Virginia, Washington and Wyoming:** It is required by state laws to inform you of the contact information for the following national consumer reporting agencies where you may obtain additional information about avoiding, preventing and protecting against identity theft and fraud alerts and credit freezes. Further, it is recommended that you remain vigilant for incidents of fraud and identity theft by reviewing credit card and other accounts statements and monitoring your credit report for unauthorized activity. You may obtain a free copy of your credit report by contacting any one or more of the following national consumer reporting agencies.

**Equifax**

P.O. Box 105069  
Atlanta, GA 30348-5069  
19094  
888-836-6351  
[www.equifax.com](http://www.equifax.com)  
[www.transunion.com](http://www.transunion.com)

**Experian**

P.O. Box 9701  
Allen, TX 75013  
855-414-6047  
[www.experian.com](http://www.experian.com)

**TransUnion**

P.O. Box 160  
Woodlyn, PA  
999-808-8872

**For residents of Arizona, Colorado, Illinois, Maryland, and North Carolina:** It is required by state law to inform you, that you can contact the Federal Trade Commission to obtain additional information about avoiding, preventing and protecting against identity theft, obtaining fraud alerts and credit freezes on your credit record or if you believe you have been the victim of identity theft. You may contact the Federal Trade Commission's Bureau of Consumer Protection in the following ways.

**Federal Trade Commission**  
**Bureau of Consumer Protection**  
600 Pennsylvania Ave., NW  
Washington, DC 20580  
1-877-ID-THEFT (877-438-4338)  
[www.consumer.ftc.gov](http://www.consumer.ftc.gov)

**For the residents of Iowa and Oregon:** It is required by state law to advise you to report any suspected incidents of identity theft to local law enforcement, the Attorney General of your state, and the Federal Trade Commission.

**For the residents of Maryland:** It is required by state law to inform you and advise you that you may contact the Maryland Office of the Attorney General, Consumer Protection Division to obtain additional information about steps you can take to avoid identity theft or if you have been or believe you have been the victim of identity theft. Attorney General Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, 888-743-0023, [consumer@oag.state.md.us](mailto:consumer@oag.state.md.us).

**For the residents of North Carolina:** It is required by state law to inform you and advise you that you may contact the North Carolina Office of the Attorney General Consumer Protection Division to obtain information about preventing identity theft or if you have been or believe you have been the victim of identity theft. Attorney General Consumer Protection Division, Attorney General's Office Mail Service Center 9001, Raleigh, NC 27699-9001, 877-5-NO-SCAM (877-566-7226), [www.ncdoj.gov/Consumer](http://www.ncdoj.gov/Consumer).

**For the residents of Massachusetts:** It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft. You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent; however, using a security freeze may delay your ability to obtain credit.

To place a security freeze on your credit report, you need to send a request to a consumer reporting agency listed below by certified mail, overnight mail, or regular stamped mail. The following information must be included when requesting a security freeze: (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency; (6) a copy of a government-issued identification card and (7) a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. Under Massachusetts law, there should be no charge for a security freeze.

**Equifax Security Freeze**  
P.O. Box 105788  
Atlanta, Georgia  
6790  
[www.equifax.com](http://www.equifax.com)

**Experian Security Freeze**  
P.O. Box 9554  
30348 Allen, TX 75013  
[www.experian.com](http://www.experian.com)

**TransUnion (FVAD)**  
P.O. Box 6790  
Fullerton, CA 92834-  
[www.transunion.com](http://www.transunion.com)

**For the residents of California and Wyoming:** It is required by state law to inform you that this notice was not delayed as a result of a law enforcement request.

**ADDITIONAL DETAILS REGARDING YOUR {18-MONTH} EXPERIAN IDENTITYWORKS MEMBERSHIP:**

A credit card is not required for enrollment in Experian IdentityWorks.

You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- ☑ Experian credit report at signup: See what information is associated with your credit file. Daily credit reports are available for online members only.\*
- ☑ Credit Monitoring: Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- ☑ Internet Surveillance: Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- ☑ Identity Restoration: Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- ☑ Experian IdentityWorks ExtendCARE™: You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- ☑ Up to \$1 Million Identity Theft Insurance\*\*\*: Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at [customer service number]. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

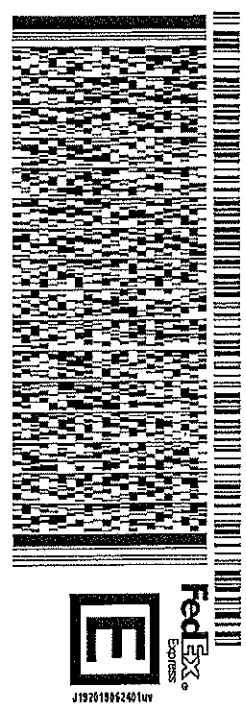
Please note that this Identity Restoration support is available to you for one year from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration). You will also find self-help tips and information about identity protection at this site.

ORIGIN ID:CHAA (423) 756-6600  
DEDIE CURTIS  
1200 VOLUNTEER BUILDING  
832 GEORGIA AVENUE  
CHATTANOOGA TN 37402  
UNITED STATES US

SHIP DATE: 26 JUL 19  
ACT WT: 1.00 LB  
CAD: 112804917/M/EN74160  
BILL SENDER

TO ATTN: DATA BREACH NOTIFICATION  
MASSACHUSETTS ATTORNEY GENERAL  
CONSUMER PROTECTION DIVISION  
ONE ASHBURTON PLACE  
BOSTON MA 02108  
(617) 721-2200  
REF: 24749-0021  
DEPT:  
PC:

567.J21A6F9.05A2



TRK# 7758 4979 8178  
0201  
MON - 29 JUL 10:30A  
PRIORITY OVERNIGHT

XELWMA  
MA-US BOS  
02108  
Large barcode

**After printing this label:**  
1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.  
2. Fold the printed page along the horizontal line.  
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

**Warning:** Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on [fedex.com](http://fedex.com). FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.