

17155

**Elam Consulting, Inc.**  
**Business Insurance Consultants**

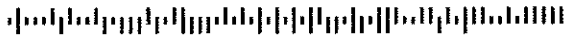
Return Mail Processing  
PO Box 589  
Claysburg, PA 16625-0589

June 29, 2020

F6205-L03-0000003 P001 T00001 \*\*\*\*\*MIXED AADC 159



SAMPLE A SAMPLE - L03  
APT 123  
123 ANY ST  
ANYTOWN, MA 12345-6789



Subject: Notice of Data Security Incident

Dear Sample A Sample:

I am writing to inform you of a data security incident that may have affected your personal information ("PI"). At Elam Consulting, Inc. ("ECI"), we take the privacy and security of your information very seriously and regret any concern that this incident may cause you. That is why we are contacting you and informing you about steps that can be taken to protect your information.

Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

Massachusetts law also allows consumers to place a security freeze on their credit reports. A security freeze prohibits a consumer reporting agency from releasing any information from a consumer's credit report without written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit, mortgages, employment, housing or other services.

To place a security freeze on your credit report, you must send a written request to **each** of the three major consumer reporting agencies:

Equifax Security Freeze: P.O. Box 105788, Atlanta, GA 30348, 1-800-525-6285, [www.equifax.com](http://www.equifax.com).

Experian Security Freeze: P.O. Box 9701, Allen, TX 75013, 1-888-397-3742, [www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html).

TransUnion Security Freeze: P.O. Box 2000, Chester, PA, 19016, 1-800-916-8800, [freeze.transunion.com](http://freeze.transunion.com).



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

1. Full name and any suffixes;
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 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;

The consumer reporting agencies have three (3) business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with a unique personal identification number (PIN) or password, or both that can be used by you to authorize the removal or lifting of the security freeze.

To temporarily lift the security freeze in order to allow a specific entity or individual access to your credit report, you must call or send a written request to the consumer reporting agencies by mail and include proper identification (name, address, and Social Security Number) and the PIN or password provided to you when you placed the security freeze as well as the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The consumer reporting agencies have three (3) business days after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must send a written request to each of the three consumer reporting agencies by mail and include proper identification (name, address, and Social Security number) and the PIN or password provided to you when you placed the security freeze. The consumer reporting agencies have three (3) business days after receiving your request to remove the security freeze.

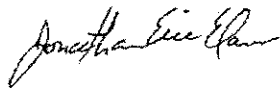
In order to determine whether any unauthorized credit was obtained with your information, you may obtain a copy of your credit report at [www.annualcreditreport.com](http://www.annualcreditreport.com) or 877-322-8228. You may also request information on how to place a fraud alert by contacting any of the above consumer reporting agencies. A fraud alert is intended to alert you if someone attempts to obtain credit in your name without your consent. It is recommended that you remain vigilant for any incidents of fraud or identity theft by reviewing credit card account statements and your credit report for unauthorized activity. You may also contact the Federal Trade Commission (FTC) to learn more about how to prevent identity theft:

FTC, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, D.C. 20580, [www.ftc.gov/bcp/edu/microsites/idtheft/](http://www.ftc.gov/bcp/edu/microsites/idtheft/), 877-IDTHEFT (438-4338).

ECI has secured the services of Experian's® IdentityWorks<sup>SM</sup> to provide identity monitoring services at no cost to you, for eighteen (18) months. We are also providing you with information about steps you can take to help safeguard your personal information which appear on the following page. We also encourage you to contact Experian® with any questions and to enroll in the free services provided by calling (888) 292-0035 or by going to <http://www.experianidworks.com/credit> and using the Enrollment Code provided in this letter. Experian representatives are available to assist you Monday through Friday from 8:00 am – 8:00 pm Central Time and Saturday/Sunday from 10:00 am – 7:00 pm Central Time.

We take this matter very seriously. Please accept our sincere apologies and know that we deeply regret any worry or inconvenience that this may cause you.

Sincerely,

A handwritten signature in cursive script that reads "Eric Elam".

Eric Elam  
President



## STEPS YOU CAN TAKE TO FURTHER PROTECT YOUR INFORMATION

**Review Your Account Statements and Notify Law Enforcement of Suspicious Activity:** As a precautionary measure, we recommend that you remain vigilant and review your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You should also promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (the "FTC").

**Copy of Credit Report:** You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can also contact one of the following three national credit reporting agencies:

<b>Equifax</b> P.O. Box 740241 Atlanta, GA 30374 1-866-349-5191 <a href="http://www.equifax.com">www.equifax.com</a>	<b>Experian</b> P.O. Box 2002 Allen, TX 75013 1-888-397-3742 <a href="http://www.experian.com">www.experian.com</a>	<b>TransUnion</b> P.O. Box 1000 Chester, PA 19016 1-800-916-8800 <a href="http://www.transunion.com">www.transunion.com</a>	<b>Free Annual Report</b> P.O. Box 105281 Atlanta, GA 30348 1-877-322-8228 <a href="http://www.annualcreditreport.com">www.annualcreditreport.com</a>
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**Fraud Alert:** You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 90 days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

**Security Freeze:** Under U.S. law, you have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

**Additional Free Resources:** You can obtain information from the consumer reporting agencies, the FTC or from your respective state Attorney General about steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state. Residents of North Carolina can obtain more information from their Attorneys General using the contact information below.

**Federal Trade Commission**  
600 Pennsylvania Ave, NW  
Washington, DC 20580  
[consumer.ftc.gov](http://consumer.ftc.gov), and  
[www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)  
1-877-438-4338

**North Carolina Attorney  
General**  
9001 Mail Service Center  
Raleigh, NC 27699  
[ncdoj.gov](http://ncdoj.gov)  
1-877-566-7226

**You also have certain rights under the Fair Credit Reporting Act (FCRA):** These rights include knowing what is in your file; disputing incomplete or inaccurate information; and requiring consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.

**Butts, Nicholas A (SCA)**

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**From:** Godfrey, Lauren <Lauren.Godfrey@lewisbrisbois.com>  
**Sent:** Monday, June 29, 2020 6:56 PM  
**To:** Breaches, Data (SCA)  
**Subject:** FW: [EXT] Security Breach Notifications  
**Attachments:** Elam Consulting- CRA Notification Letter 6\_29\_20 4852-9260-9217 v.1.pdf

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good evening,

I submitted a notice of data security incident through the online form but did not attach the letter to the consumer reporting agencies that we sent. I have attached it here. My apologies for the oversight.

Very truly yours,



Lauren D. Godfrey, CIPP/US  
Partner  
Lauren.Godfrey@lewisbrisbois.com  
T: 412.567.5113 F: 412.567.5494

429 Fourth Avenue, Suite 805, Pittsburgh, PA 15219 | [LewisBrisbois.com](http://LewisBrisbois.com)

Representing clients from coast to coast. View our locations nationwide.

This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are required to notify the sender, then delete this email and any attachment from your computer and any of your electronic devices where the message is stored.

**From:** Data Breaches [mailto:noreply+63308160d0553ecb@formstack.com]  
**Sent:** Monday, June 29, 2020 6:51 PM  
**To:** Godfrey, Lauren  
**Subject:** [EXT] Security Breach Notifications



Thank you for using the Security Breach Online Notifications Form. The following information has been submitted

**Submission Time:** Jun 29, 2020 6:51 PM

**Section 1: Organization and Contact Information**

**Business Name:** Elam Consulting, Inc.  
**Business Address:**  
**Company Type:** Other  
**Your Name:** Lauren Godfrey  
**Last Name:** Godfrey  
**Title:** Attorney  
**Contact Address:** 429 Fourth Avenue, Suite 805  
Pittsburgh, PA 15219  
**Telephone Number:** (412) 567-5113  
**Ext:**  
**Email Address:** lauren.godfrey@lewisbrisbois.com  
**Relationship to Org:** Other

## Section 2 Breach Information

**Breach Type:** Electronic

**Date Data Breach Was Discovered:** 07/18/2019

**Number of Massachusetts Residents Affected:** 2

**Person in custody of personal information when breach occurred. If multiple persons were in custody of personal information, select the relationship of the primary person:** Other

**Please give a detailed explanation of how personal information was protected at the time of the breach, and state the means used (for example, locks/encryption methods):** In July 2019, ECI learned that a former independent contractor downloaded certain documents from ECI's network in connection with his resignation from ECI. ECI immediately commenced an investigation and retained an independent forensics investigation company and legal experts to determine what information the former contractor accessed and whether the former contractor provided ECI's documents to unauthorized individuals. ECI also engaged a third party vendor to conduct a detailed review of the documents that were taken to determine whether personal information was contained within the documents.

While the former contractor returned the downloaded documents to ECI following the incident and stated he had not disclosed the information, ECI has been unable to completely rule out any potential of unauthorized access to this informatio

**Please select the types of personal information that was included in the data breach:** *Social Security numbers*  
= Selection(s)  
*Driver's License* = Selection(s)

**Please check all of the boxes that apply to your breach:** The breach was a result of a malicious/criminal act.  
= Selection(s)

## Section 3 Security Environment

**For breaches involving paper: A lock or security mechanism was used to physically protect the data:** N/A

**Date of last review of written security program:**

**Physical access to systems containing personal information was restricted to authorized personnel only:** Yes

**Network configuration of breached system:** Closed System For breaches involving electronic systems, complete the following: Personal information stored on the breached system was password-protected and/or restricted by user permissions. = Selection(s)

#### **Section 4 Remediation**

**The company has notified all Massachusetts residents affected by the breach:** Yes

**Method(s) used to notify Massachusetts residents affected by the breach (check all that apply):** Option2 | US Mail

**Please explain your answer of other above:**

**Date notices were first sent to Massachusetts residents:** 06/29/2020

**Your company offered complimentary credit monitoring services to Massachusetts residents affected by the breach:** Yes

**Law enforcement has been notified of this data breach:** No

**Please describe how your company responded to the breach. Include what changes were made or may be made to prevent another similar breach from occurring:** ECI immediately commenced an investigation and retained an independent forensics investigation company and legal experts to determine what information the former contractor accessed and whether the former contractor provided ECI's documents to unauthorized individuals. ECI also engaged a third party vendor to conduct a detailed review of the documents that were taken to determine whether personal information was contained within the documents. While the former contractor returned the downloaded documents to ECI following the incident and stated he had not disclosed the information, ECI has been unable to completely rule out any potential of unauthorized access to this information. ECI changed the independent contractor's passwords to ECI's network to prevent further access.

Attached file 1:

[https://s3.amazonaws.com/files.formstack.com/uploads/3269138/71421777/630032684/71421777\\_experian\\_t6\\_205\\_elam - consumer notification letter adult ma 103 4835-9703-2897 v.1lauren.godfreylewisbrisbois.com..\\_2\\_4814-0278-5473 v.1.pdf](https://s3.amazonaws.com/files.formstack.com/uploads/3269138/71421777/630032684/71421777_experian_t6_205_elam_-_consumer_notification_letter_adult_ma_103_4835-9703-2897_v.1lauren.godfreylewisbrisbois.com.._2_4814-0278-5473_v.1.pdf)

Attached file 2:

Attached file 3:

Attached file 4:



Lauren D. Godfrey  
429 Fourth Avenue, Suite 805  
Pittsburgh, PA 15219  
Lauren.Godfrey@lewisbrisbois.com  
Direct: 412.567.5113

June 29, 2020

**Via email to: [security.dataadministration@equifax.com](mailto:security.dataadministration@equifax.com)**

Equifax  
Consumer Fraud Division  
P.O. Box 740256  
Atlanta, GA 30374

**Via email to: [businessrecordsvictimassistance@experian.com](mailto:businessrecordsvictimassistance@experian.com)**

Experian  
Consumer Fraud Assistance  
P.O. Box 9556  
Allen, TX 75013

**Via email to: [databreach@transunion.com](mailto:databreach@transunion.com)**

TransUnion  
2 Baldwin Place  
Crum Lynne, PA 19022

Re: Notification of Data Security Incident

To Whom It May Concern:

We represent Elam Consulting, Inc. ("ECI"), an insurance consulting agency based in Mississippi, in connection with a data security incident which is described in greater detail below.

**1. Nature of the security incident.**

In July 2019, ECI learned that a former independent contractor downloaded certain documents from ECI's network in connection with his resignation from ECI. ECI immediately commenced an investigation and retained an independent forensics investigation company and legal experts to determine what information the former contractor accessed and whether the former contractor provided ECI's documents to unauthorized individuals. While the former contractor returned the downloaded documents to ECI following the incident and stated he had not disclosed the information, ECI has



been unable to completely rule out any potential of unauthorized access to this information.

ECI also engaged a third party vendor to conduct a detailed review of the documents that were taken to determine whether personal information was contained within the documents. Through this process, we learned on May 29, 2020 that the impacted data set included names, addresses, dates of birth, driver's license numbers, Social Security Numbers, health information, and/or medical billing/claim information for approximately 5,618 adult-aged individuals.

## **2. Steps taken relating to the incident.**

As soon as ECI discovered the incident, it took the steps described above.

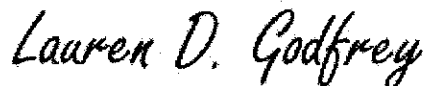
Through the course of the investigation, ECI learned that individuals' personal information was potentially contained within the impacted email account. We then worked diligently to identify up-to-date address information and notified potentially impacted individuals about this incident which was completed on June 29, 2020.

ECI has no evidence to suggest that this personal information has been further misused. However, out of an abundance of caution, ECI has made arrangements for complimentary credit monitoring and identity theft restoration services for a period of twelve (12) months, or eighteen (18) months depending on state of residence, at no cost to the affected individuals. ECI has also established a toll-free call center through Experian to answer any questions about the Incident.

## **3. Contact information.**

If you have any questions or need additional information, please do not hesitate to contact me at (412) 567-5113 or via email at [Lauren.Godfrey@lewisbrisbois.com](mailto:Lauren.Godfrey@lewisbrisbois.com).

Best regards,



Lauren D. Godfrey, CIPP/US of  
LEWIS BRISBOIS BISGAARD & SMITH LLP

Enclosure: Sample Notification Letter