



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

October 24, 2024

VIA E-MAIL

Office of the New Hampshire Attorney General
Consumer Protection & Antitrust Bureau
33 Capitol Street
Concord, NH 03301
E-mail: DOJ-CPB@doj.nh.gov

Re: Notice of Data Event

To Whom It May Concern:

We represent Starkweather & Shepley Insurance Brokerage, Inc. (“Starkweather”) located at 60/70 Catamore Boulevard, East Providence, Rhode Island 02914, and are writing to notify your office of an incident that may affect the security of certain personal information relating to two (2) New Hampshire residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Starkweather does not waive any rights or defenses regarding the applicability of New Hampshire law, the applicability of the New Hampshire data event notification statute, or personal jurisdiction.

Nature of the Data Event

Starkweather has been actively investigating suspicious activity concerning a single Starkweather employee email account. Upon learning of the suspicious activity, Starkweather quickly disabled the account, reset the account’s credentials, and launched an investigation with the assistance of third-party cybersecurity and data privacy specialists. The investigation determined that unauthorized actor(s) accessed the email account from February 29, 2024, to April 11, 2024. Starkweather then began a comprehensive and time-intensive review of the email account’s contents that could have been subject to unauthorized access to identify the potentially impacted individuals, associated types of data, and address information for the potentially impacted individuals with the assistance of third-party specialists. Starkweather completed this process on September 26, 2024.

The information that could have been subject to unauthorized access includes

Notice to New Hampshire Residents

On October 24, 2024, Starkweather provided written notice of this incident to two (2) New Hampshire residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon discovering the event, Starkweather moved quickly to investigate and respond to the incident, assess the security of Starkweather systems, and identify potentially affected individuals. Starkweather is also reviewing existing security policies and have implemented additional cybersecurity measures to further protect against similar events moving forward. Starkweather is providing access to credit monitoring services for _____, through Experian, to individuals whose personal information was potentially affected by this incident, at no cost to these individuals.

Additionally, Starkweather is providing impacted individuals with guidance on how to better protect against identity theft and fraud. Starkweather is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Starkweather is providing written notice of this incident to relevant state regulators, as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at _____.

Very truly yours,

Angelina W. Freind of
MULLEN COUGHLIN LLC

AWF/sph
Enclosure

EXHIBIT A



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

October 24, 2024

M2668-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345



SAMPLE A SAMPLE - L01
 APT ABC
 123 ANY STREET
 ANYTOWN, ST 12345-6789



NOTICE OF [Extra2]

Dear Sample A. Sample:

Starkweather & Shepley Insurance Brokerage, Inc. (“Starkweather”) writes to inform you of an event that may affect the privacy of some of your personal information. Although we are unaware of any identity theft or fraud in relation to the event, we are providing you with information about the event, our response, and additional measures you can take to help protect your information, should you feel it appropriate to do so.

What Happened? Starkweather has been actively investigating suspicious activity concerning a single Starkweather employee email account. Upon learning of the suspicious activity, we quickly disabled the account, reset the account’s credentials, and launched an investigation with the assistance of third-party cybersecurity and data privacy specialists. The investigation determined that unauthorized actor(s) accessed the email account from February 29, 2024, to April 11, 2024. We then began a comprehensive and time-intensive review of the email account’s contents that could have been subject to unauthorized access to identify the potentially impacted individuals, associated types of data, and address information for the potentially impacted individuals with the assistance of third-party specialists.

What Information Was Involved? On September 26, 2024, our investigation determined that the following types of personal information may be affected: your [Extra1]. Starkweather is not aware of any actual or attempted misuse of your information.

What We Are Doing. The confidentiality, privacy, and security of information in our care is among our highest priorities. Upon learning of the suspicious activity, we quickly disabled the account, reset the account’s credentials, and commenced an investigation to confirm the nature and scope of the event. We are reviewing existing security policies and have implemented additional cybersecurity measures to further protect against similar events moving forward. We also reinforced with our staff the importance of safeguarding information in our possession and worked with data privacy specialists to assist in the response. Additionally, we are also notifying potentially impacted individuals, including you, so they may take steps to best protect their information, should they feel it is appropriate to do so.

As an added precaution, we are offering you immediate access to credit monitoring and identity theft protection services for _____ at no cost to you, through Experian. You can find information on how to enroll in these services in the enclosed *STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION*. We encourage you to enroll in these services as we are not able to do so on your behalf.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and explanation of benefits as well as monitoring your free credit reports for suspicious activity and to detect errors. Please also review the information contained in the enclosed *STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION*.

For More Information. We understand that you may have questions about this event that are not addressed in this letter. If you have additional questions, please call 833-918-1152 from 9:00 a.m. ET to 9:00 p.m. ET, Monday through Friday, excluding major U.S. holidays. You may also write to us at 60 Catamore Boulevard, East Providence, Rhode Island 02914. We take this event very seriously and sincerely regret any inconvenience or concern this event may cause you.

Sincerely,

Peter C. Plumb
Chief Executive Officer
Starkweather & Shepley Insurance Brokerage, Inc.

STEPS YOU CAN TAKE TO PROTECT PERSONAL INFORMATION

Enroll in Monitoring Services

To help protect your identity, we are offering complimentary access to Experian IdentityWorksSM for _____.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. 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 from the date of the incident (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 Identity Restoration is available to you for _____ 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 _____.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary _____ membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident, or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at _____ (5:59 UTC). Be prepared to provide engagement number _____ as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR _____ 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 file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one (1) free credit report annually from each of the three (3) major credit reporting bureaus, Equifax, Experian, and TransUnion. To order a free credit report, visit <http://www.annualcreditreport.com> or call, toll-free, 1 (877) 322-8228. Consumers may also directly contact the three (3) major credit reporting bureaus listed below to request a free copy of their credit report.

Consumers have the right to place an initial or extended “fraud alert” on a 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven (7) years. Should consumers wish to place a fraud alert, please contact any of the three (3) major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two (2) to five (5) 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, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three (3) major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help/
1 (888) 298-0045	1 (888) 397-3742	1 (800) 916-8800
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect their personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580; <https://www.identitytheft.gov>; 1 (877) ID-THEFT (1 (877) 438-4338); and 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. Consumers can obtain further information on

how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement, the relevant state Attorney General, and the Federal Trade Commission. This notice has not been delayed by law enforcement.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; <https://www.riag.ri.gov>; and 1 (401) 274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. There are approximately three (3) Rhode Island residents that may be impacted by this event.

