



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

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May 25, 2022

VIA E-MAIL

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
E-mail: idtheft@oag.state.md.us

Re: Notice of Data Event

Dear Sir or Madam:

We represent Elephant Insurance Services, LLC (“Elephant Insurance”), located at 9950 Mayland Drive, Henrico, VA 23233, and write to notify your office of an incident that may affect the security of certain personal information relating to approximately 233,550 Maryland residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Elephant Insurance does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland data event notification statute, or personal jurisdiction.

Nature of the Data Event

On April 1, 2022, Elephant Insurance identified unusual activity on a network system. Elephant Insurance promptly undertook a comprehensive investigation working with third-party forensic specialists, to secure its systems and to confirm the nature and scope of the incident, as well as any impact to information on the network. Through the investigation, Elephant Insurance determined that certain consumer information may have been viewed on or copied from network databases between March 26, 2022 and April 1, 2022. Elephant Insurance undertook a comprehensive review to determine what information was or may have been impacted and to whom it related. On April 25, 2022, the review identified the individuals whose information was in the affected data. Elephant Insurance is now taking steps to provide notice to those individuals. The potentially affected personal information, as defined by Md. Code Ann., Com. Law § 14-3501, related to Maryland residents includes name and driver’s license number.

Notice to Maryland Residents

On May 6, 2022, Elephant Insurance posted notice of this incident to the homepage of its website and provided notice to statewide media in all U.S. states). Beginning on or about May 25, 2022, Elephant Insurance began providing directed notice of this incident to potentially affected individuals, which includes approximately 233,550 Maryland residents. Written notice is being provided via a combination of email and mail in substantially the same form as the communication attached here as ***Exhibit A***.

Other Steps Taken and To Be Taken

Upon identifying unusual system activity, Elephant Insurance took prompt measures to secure its systems, investigate this incident, and determine what information may be affected. Elephant Insurance conducted a comprehensive and thorough investigation, including reporting the incident to federal law enforcement. Elephant Insurance is also reviewing and enhancing existing safeguards and procedures as part of its commitment to security. Further, Elephant Insurance has notified and is in communication with the appropriate insurance regulators in relevant U.S. states.

As part of its notifications, Elephant Insurance is providing potentially affected individuals with access to credit monitoring services for twelve (12) months at no cost to these individuals. Additionally, Elephant Insurance is providing individuals with guidance on how to protect against identity theft and fraud, including 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.

Elephant Insurance is providing written notice of this incident to relevant state regulators, including relevant state insurance authorities, as necessary, and to the three major credit reporting agencies, Equifax, Experian, and TransUnion.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4773.

Very truly yours,

M. Alexandra Belton of
MULLEN COUGHLIN LLC

MABB/rhb
Enclosure

EXHIBIT A



<<Date>> (Format: Month Day, Year)

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

<<b2b_text_1 (Variable Header)>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

Elephant Insurance, and our subsidiary Apparent Insurance (together, “Elephant Insurance”), value and respect the privacy of your information which is why we are writing to let you know about a recent incident that may involve some of your information. We have your information because you either are a current or previous Elephant Insurance customer or we received your information as part of providing a quote for auto or other insurance coverage. This letter provides you with information about the incident, our response, and resources available to you.

What Happened? In April 2022, we identified unusual activity on our network. We promptly undertook a comprehensive investigation, working with third-party specialists, to secure our systems and to confirm the nature and scope of the incident, as well as any impact to information on our network. Through the investigation, we determined that certain consumer information may have been viewed on or copied from our network between March 26, 2022 and April 1, 2022. We undertook a comprehensive review to determine what information was impacted and to whom it related. You are receiving this letter because, on April 25, 2022, our review determined that your information was in the affected data.

What Information Was Involved? Our investigation determined that the affected information includes your <<b2b_text_2 (“name” and Impacted Data)>>.

What We Are Doing. Upon identifying unusual system activity, we took prompt measures to secure our systems, investigate this incident, and determine what information may be affected. We reported the incident to federal law enforcement and are notifying appropriate state regulatory agencies. As part of our ongoing commitment to information security, we are also reviewing and enhancing our existing safeguards and procedures.

As an added precaution, we are offering you access to 12 months of credit monitoring services at no cost to you. To activate these services, please follow the instructions included in the attached ***Steps You Can Take to Help Protect Information***.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. You should promptly report any activity indicative of identity theft or fraud immediately to law enforcement. Please also review the information contained in the attached ***Steps You Can Take to Help Protect Information***.

For More Information. We understand that you may have questions that are not addressed in this notice. If you have additional questions, please call our dedicated assistance line at (855) 788-2603, which is available from 9:00 AM to 6:30 PM EST Monday through Friday (excluding major U.S. holidays).

Sincerely,

Elephant Insurance Services, LLC
www.elephant.com

STEPS YOU CAN TAKE TO HELP PROTECT INFORMATION

Activate Credit Monitoring Services

We have secured the services of Kroll to provide identity monitoring at no cost to you for one year. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people whose information may be affected by a data incident. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6 (Date)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s_n>>

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also directly contact the three major credit reporting bureaus listed below to request a free copy of your 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 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 three 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 your name without your consent. However, you should be aware that using a credit 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 credit freeze on your credit report. To request a credit freeze, you will need to provide 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 to 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, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if you are a victim of identity theft.

Should you wish to place a credit freeze or fraud alert, please contact the three 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
888-298-0045	888-397-3742	833-395-6938
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

You may further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; 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. 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 District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, DC 20001; 202-727-3400; and oag@dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and www.oag.state.md.us. Elephant Insurance is located at 9950 Mayland Drive, Suite 400, Henrico, VA 23233.

For New Mexico residents, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov/>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 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 \[#\] Rhode Island residents impacted by this incident.](#)



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.