

August 5, 2022

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Via electronic-mail: Idtheft@oag.state.md.us

Attorney General Brian Frosch
Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

Re:	Our Client	:	Cornerstone National Insurance Company
	Matter	:	Data Security Incident
	Wilson Elser File #	:	16516.01725

Dear Attorney General Frosch:

We represent Cornerstone National Insurance Company (hereinafter the “Cornerstone”), headquartered in Concordia, Missouri, with respect to a data security incident described in more detail below. Cornerstone takes the security and privacy of the information in its control seriously, and has taken steps to prevent a similar incident from occurring in the future.

This letter will serve to inform you of the nature of the security breach, the number of Maryland residents being notified, what information has been compromised, and the steps that Cornerstone is taking in response. We have also enclosed hereto a sample of the notifications made to the potentially impacted individuals, which includes an offer of free credit monitoring.

1. Nature of the Security Incident

Cornerstone National Insurance Company (“Cornerstone”) is an insurance company located in Missouri. Through its policy management software, Cornerstone and its external agents access various subscription services, including computerized databases where driver’s license information is available for the purpose of performing insurance application due diligence.

On November 29, 2021, Cornerstone became aware that an unauthorized third party gained access to certain agent user accounts and leveraged this access to run unauthorized searches in these subscription databases. This incident resulted in the exposure of the following personal information: first name, last name, and driver’s license number.

2. Number of Maryland Residents Affected

A total of one hundred forty nine (149) residents of Maryland was potentially affected by this security incident. A notification letter to these individuals were mailed on August 4, 2022, by first class mail, and should be received by individuals promptly. A sample copy of the notification letter is included with this letter.

3. Steps Taken

Upon detecting this incident, Cornerstone moved quickly to initiate an incident response, which included a global password reset and fully securing and remediating its own network. Cornerstone also notified its software vendor, who conducted a forensic investigation to confirm security.

Once the environment was secure, Cornerstone moved forward with a comprehensive analysis into the extent of the unauthorized activity. The list of individuals to notify was completed on July 6, 2022. In its notification letters Cornerstone extended to all potentially impacted individuals an offer for free credit monitoring through IDX.

Cornerstone has also reviewed, altered, and enhanced its safeguards and policies relating to security.

4. Contact Information

Cornerstone remains dedicated to protecting the sensitive information in its control. If you have any questions or need additional information, please do not hesitate to contact me at Rachel.Cobble@WilsonElser.com or 205.709.8991.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP

Rachel H. Cobble, Esq.

Copy: Ross Molina, Esq. (Wilson Elser LLP)

Enclosure: *Sample Notification Letter*



P.O Box 989728
West Sacramento, CA 95798-9728

Via First-Class Mail

<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zipcode>>

August 4, 2022

Notice of Data Security Incident

Dear <<First Name>> <<Last Name>>,

We are writing to inform you of an incident that exposed your sensitive personal information. We take the privacy of your personal information seriously and want to provide you with information and resources you can use to protect information.

What Happened and What Information was Involved:

Cornerstone National Insurance Company ("Cornerstone") is an insurance company located in Missouri. Through its policy management software, Cornerstone and its external agents access various subscription services, including computerized databases where driver's license information is available for the purpose of performing insurance application due diligence.

On November 29, 2021, Cornerstone became aware that an unauthorized third party gained access to certain agent user accounts and leveraged this access to run unauthorized searches in these subscription databases. Cornerstone immediately issued a global password reset and notified its software vendor, who conducted a forensic investigation to confirm security. Once the environment was secure, we moved forward with a comprehensive analysis into the extent of unauthorized activity.

These investigations, which concluded on July 6, 2022, determined that the following personal information could have been accessed by an unauthorized third party: first name, last name, and driver's license number.

We have not received information of a specific misuse of any personal information.

What We Are Doing:

Data security is a priority to Cornerstone. Upon detecting this incident we moved quickly to initiate a response, which included the above-referenced communications and investigation, as well as confirming the security of our network environment. We are also reviewing and enhancing our technical safeguards.

Additionally, we are offering you free credit monitoring and identity theft protection services through IDX, a leading identity protection technology company. IDX services include: <<12/24 months>> of credit monitoring and fully managed identity theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

What You Can Do:

To enroll in Credit Monitoring services at no charge, please log on to <https://response.idx.us/cornerstone> and follow the instructions provided. When prompted please provide the following enrollment code to receive services: **<<Enrollment Code>>**. IDX is available Monday through Friday, 9:00 am – 9:00 pm EST. Please note the deadline to enroll is **November 4, 2022**.

We encourage you to take full advantage of this service offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

Enclosed you will find additional information regarding the resources available to you, and the steps that you can take to further protect your personal information.

For More Information:

We recognize that you may have questions not addressed in this letter. If you have additional questions, please call IDX at (833) 423-2977, Monday through Friday, 9:00 am – 9:00 pm EST.

We value the security of the personal data that we maintain, and understand the frustration, concern, and inconvenience that this incident may have caused.

Sincerely,

Cornerstone National Insurance Company

Additional Information

Credit Reports: You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

Security Freeze: 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. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (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 or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and 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. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960 https://www.equifax.com/personal/credit-report-services/credit-freeze/	Experian Security Freeze P.O. Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	TransUnion Security Freeze P.O. Box 160 Woodlyn, PA 19094 1-800-909-8872 www.transunion.com/credit-freeze
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Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with:

Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf);

TransUnion (<https://www.transunion.com/fraud-alerts>); or

Experian (<https://www.experian.com/fraud/center.html>).

A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any 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. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at listed above.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

File Police Report: You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

FTC and Attorneys General: You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338), 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. This notice has not been delayed by law enforcement.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, and www.oag.state.md.us.

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 agencies 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 violators. 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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

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

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 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.



P.O Box 989728
West Sacramento, CA 95798-9728

Via First-Class Mail

Parent/Guardian of <<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zipcode>>

Notice of Data Security Incident

August 4, 2022

Dear Parent or Guardian of <<First Name>> <<Last Name>>,

We are writing to inform you of an incident that exposed your child's sensitive personal information. We take the privacy of your child's information seriously and want to provide you with information and resources you can use to protect their information.

What Happened and What Information was Involved:

Cornerstone National Insurance Company ("Cornerstone") is an insurance company located in Missouri. Through its policy management software, Cornerstone and its external agents access various subscription services, including computerized databases where driver's license information is available for the purpose of performing insurance application due diligence.

On November 29, 2021, Cornerstone became aware that an unauthorized third party gained access to certain agent user accounts and leveraged this access to run unauthorized searches in these subscription databases. Cornerstone immediately issued a global password reset and notified its software vendor, who conducted a forensic investigation to confirm security. Once the environment was secure, we moved forward with a comprehensive analysis into the extent of unauthorized activity.

These investigations, which concluded on July 6, 2022, determined that the following personal information could have been accessed by an unauthorized third party: first name, last name, and driver's license number.

While we have no evidence that your child's information has been specifically misused, your child's following personal information could have been accessed by an unauthorized third party: first and last name, driver's license number.

We have not received information of a specific misuse of personal information.

What We Are Doing:

Data security is a priority to Cornerstone. Upon detecting this incident we moved quickly to initiate a response, which included the above-referenced communications and investigation, as well as confirming the security of our network environment. We are also reviewing and enhancing our technical safeguards.

Additionally, we are offering parents of impacted minor dependents access to Cyber Monitoring services for you and your minor child offered through IDX, a leading identity protection technology company for <<12/24 months>>. With this protection, IDX will look out for your and your child's personal data on the dark web and alert you if your personally identifiable information or your child's is found online.

What You Can Do:

To enroll in monitoring services at no charge, please log on to <https://response.idx.us/cornerstone> and follow the instructions provided. When prompted please provide the following enrollment code to receive services: <<**Enrollment Code**>>. IDX is available Monday through Friday, 9:00 am – 9:00 pm EST. Please note the deadline to enroll is **November 4, 2022**.

Enclosed you will find additional information regarding the resources available to you and the steps that you can take to further protect your and your minor child's personal information. If you choose not to use these services, we are strongly urging all parents to contact the credit bureaus and ensure that no credit file exists in the name of you or your minor child.

Enclosed you will find additional information regarding the resources available to you, and the steps that you can take to further protect your personal information.

For More Information:

We recognize that you may have questions not addressed in this letter. If you have additional questions, please call IDX at (833) 423-2977, Monday through Friday, 9:00 am – 9:00 pm EST.

We value the security of the personal data that we maintain, and understand the frustration, concern, and inconvenience that this incident may have caused.

Sincerely,

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Security Freeze: 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. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (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 or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and 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. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

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FTC and Attorneys General: You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338), 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. This notice has not been delayed by law enforcement.

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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 agencies 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 violators. 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 North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, and www.ncdoj.gov.

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

For Rhode Island residents, the Rhode Island Attorney General can be reached at 150 South Main Street, Providence, Rhode Island 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.