April 16, 2021

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Via Online Submission Only

Attorney General Aaron Frey
Office of the Attorney General
6 State House Station
Augusta, ME 04333
https://appengine.egov.com/apps/me/maine/ag/reportingform

Re: Data Security Incident

Dear Attorney General Frey:

We represent Pathfinder LLD Insurance Group LLC ("Pathfinder"), located in Houston, Texas with respect to a potential data security incident described in more detail below. Pathfinder takes the security and privacy of their customers' information very seriously and has taken steps to prevent a similar incident from occurring in the future.

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

On July 30, 2020 Pathfinder discovered that it was a victim to a funds transfer fraud. Upon discovery, Pathfinder took immediate steps to contain the threat and engaged a third-party forensic firm to investigate the incident and assist with remediation efforts.

In reviewing Pathfinder's entire email tenant, the business email compromise investigation detected unauthorized access for three (3) accounts. Once the investigation concluded on October 2, 2020, the forensic firm confirmed that the accounts were compromised and synchronized with the Threat Actor(s). The accounts contained sensitive personally identifiable information ("PII"), including Social Security Number, and Driver's License or State ID Number.

2. **Number of Maine residents affected.**

A total of twenty-two (22) Maine residents may have been potentially affected by this incident. A notification letter to these individuals were mailed on April 16, 2021 by first class mail. A sample copy of the notification letter is included with this letter.

3. **Steps taken.**

Pathfinder takes the security and privacy of the information very seriously, and has taken steps to prevent a similar event from occurring in the future, as well as to protect the privacy and security of potentially impacted individuals' information. Upon discovery of the incident, Pathfinder immediately informed Wilson Elser Moskowitz Edelman & Dicker LLP. The steps taken by

Pathfinder to minimize the risk of a similar incident in the future include, but are not limited to implementing: Multi Factor Authentication; frequent mandatory password changes; multiple process changes to vendor setup and wire transfer requests. Pathfinder is also providing the potentially impacted individuals with identity theft protection and credit monitoring services for a period of twelve (12) months at no cost.

4. Contact information.

Pathfinder 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 Anjali.Das@wilsonelser.com or (312) 821-6164.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP

Anjali C. Das

Enclosure.

PATHFINDER/LL&D INSURANCE GROUP

Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

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<<Name 2>>
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<<City>><<State>><<Zip>>
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<<Date>>

Dear <<Name 1>>,

Notice of Data Breach

We are writing to inform you of a data security incident involving Pathfinder LLD Insurance Group LLC ("Pathfinder") that may have resulted in the unauthorized access to some of your personal information. Pathfinder takes the security of your personal information very seriously, and we sincerely apologize for any inconvenience this incident may cause. This letter contains information about the incident and steps you can take to protect your information.

What Happened:

On July 30, 2020 Pathfinder discovered that an unauthorized user had gained access to its network. Upon discovery of the unauthorized access, Pathfinder immediately engaged a third party professional cybersecurity forensics team to investigate the incident and determine the scope and extent of the unauthorized access and determine whether any sensitive Pathfinder personal information was compromised.

What Information Was Involved:

The forensics investigation discovered that the unauthorized individual may have had access to some of your data and Personally Identifiable Information ("PII"). The data potentially accessed includes your first and last name in combination with one or more of the following attributes: <<data elements>>.

What We Are Doing And What You Can Do:

At this time, there is no evidence that any information has been misused as a result of this incident. However, to help relieve concerns and restore confidence following this incident, we have secured the services of TransUnion to provide identity monitoring services, at no cost to you, for twelve (12) months.

TransUnion

Activation Code:
<<Activation Code>>

Complimentary One-Year *my*TrueIdentity Credit Monitoring Service

As a safeguard, we have arranged for you to enroll, at no cost to you, in an online credit monitoring service (*my*TrueIdentity) for one year provided by TransUnion Interactive, a subsidiary of TransUnion,® one of the three nationwide credit reporting companies.

How to Enroll: You can sign up online or via U.S. mail delivery.

- To enroll in this service, go to the *my*TrueIdentity website at **www.MyTrueIdentity.com** and, in the space referenced as "Enter Activation Code," enter the 12-letter Activation Code **<<Insert Unique 12-letter Activation Code>>** and follow the three steps to receive your credit monitoring service online within minutes.

- If you do not have access to the Internet and wish to enroll in a similar offline, paper-based credit monitoring service, via U.S. mail delivery, please call the TransUnion Fraud Response Services toll-free hotline at **1-855-288-5422**. When prompted, enter the six-digit telephone passcode **<<Insert static 6-digit Telephone Pass Code>>** and follow the steps to enroll in the offline credit monitoring service, add an initial fraud alert to your credit file, or to speak to a TransUnion representative if you believe you may be a victim of identity theft.

You can sign up for the online or offline credit monitoring service anytime between now and **<<Enrollment Deadline>>**. Due to privacy laws, we cannot register you directly. Please note that credit monitoring services might not be available for individuals who do not have a credit file with TransUnion or an address in the United States (or its territories) and a valid Social Security number. Enrolling in this service will not affect your credit score.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH COMPLIMENTARY CREDIT MONITORING SERVICE:

- Once you are enrolled, you will be able to obtain one year of unlimited access to your TransUnion credit report and credit score.

- The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, changes of address, and more.

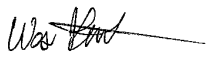
- The service also includes access to an identity restoration program that provides assistance in the event that your identity is compromised and up to $1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.)

Other Important Information:

We take the security of all information in our control very seriously, and are taking steps to prevent a similar event from occurring in the future, including but not limited to: enhancing security measures; implementing password change policies; implementing Multi Factor Authentication; and conducting Cyber Risk Awareness training.

We sincerely regret any inconvenience that this matter may cause you and remain dedicated to maintaining the security and protection of your information. We encourage you to remain vigilant and review the enclosed addendum outlining additional steps you can take to protect your personal information. If you have any questions or want to enroll in the complimentary identify monitoring services, please call 877-846-5276 Monday through Friday, 8am to 8pm Central time.

Sincerely,



Wes Kurtz, CIC
Chief Operating Officer

Additional Important Information

For residents of *Hawaii*, *Michigan*, *Missouri*, *Virginia*, *Vermont*, and *North Carolina*: It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

For residents of *Illinois*, *Iowa*, *Maryland*, *Missouri*, *North Carolina*, *Oregon*, and *West Virginia*:
It is required by state laws to inform you that 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.

For residents of *Iowa*:
State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of *Oregon*:
State laws advise you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of Arizona, Colorado, Maryland, Rhode Island, Illinois, New York, and North Carolina:
You can obtain information from the Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Maryland Office of the Attorney General Consumer Protection Division 200, St. Paul Place Baltimore, MD 21202 1-888-743-0023 www.oag.state.md.us

Rhode Island Office of the Attorney General Consumer Protection 150 South Main Street, Providence RI 02903 1-401-274-4400 www.riag.ri.gov

North Carolina Office of the Attorney General Consumer Protection Division, 9001 Mail Service Center Raleigh, NC 27699-9001 1-877-566-7226 www.ncdoj.com

Federal Trade Commission Consumer Response Center, 600 Pennsylvania Ave, NW Washington, DC 20580 1-877-IDTHEFT (438-4338) www.ftc.gov/idtheft

New York Office of Attorney General Consumer Frauds & Protection, The Capitol Albany, NY 12224 1-800-771-7755 https://ag.ny.gov/consumer-frauds/identity-theft

Colorado Office of the Attorney General Consumer Protection 1300 Broadway, 9th Floor, Denver, CO 80203 1-720-508-6000 www.coag.gov

Arizona Office of the Attorney General Consumer Protection & Advocacy Section, 2005 North Central Avenue, Phoenix, AZ 85004 1-602-542-5025

Illinois Office of the Attorney General Consumer Protection Division 100 W Randolph St., Chicago, IL 60601 1-800-243-0618 www.illinoisattorneygeneral.gov

For 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.

For residents of all states:
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 the end of this document.

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

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
800-525-6285

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
888-397-3742

TransUnion (FVAD)
P.O. Box 2000
Chester, PA 19022
800-680-7289

More information can also be obtained by contacting the Federal Trade Commission listed above.