

Office of the Attorney General
The State of Maine

RE: Data Incident Notification

To Whom It May Concern:

We write to provide notification of a recent data breach. By providing this notice, Cleary Insurance, Inc. does not waive any rights or defenses under Maine law, including the data breach notification statute.

On July 11, 2022, Cleary Insurance, Inc. discovered unusual activity in an employee's email account. They immediately began an investigation, which included working with third-party specialists to determine the nature and scope of the activity. The investigation determined there was unauthorized access to the email account between February 2, 2022 and July 11, 2022. Although their investigation did not confirm access to specific information within the account, in an abundance of caution, they conducted a review of the account to determine the type of information contained therein. On September 9, 2022, they completed their review and began confirming address information for potentially impacted individuals. The type of information in the account included name and the following: Social Security number and driver's license/state ID number. Cleary Insurance, Inc. identified approximately three Maine residents who may have been impacted by this incident.

In response to this incident, Cleary Insurance, Inc. conducted an investigation, changed the email account password, and is reviewing its policies and procedures related to data protection. Additionally, they began providing notice to the potentially impacted individuals on October 14, 2022 via U.S. mail. A copy of the notice is attached as Exhibit A. In an abundance of caution, Cleary Insurance, Inc. is offering the potentially impacted individuals complimentary credit monitoring and identity protection services for 24 months.

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>>,

Cleary Insurance, Inc. provides insurance brokerage services to employers and writes to notify you of a recent incident that may impact the privacy of certain information provided to us. We take this incident very seriously and are providing you information about the incident, our response, and steps you can take to help protect your information.

What Happened? On July 11, 2022, we discovered unusual activity in an employee's email account. We immediately began an investigation, which included working with third-party specialists to determine the nature and scope of the activity. The investigation determined there was unauthorized access to the email account between February 2, 2022 and July 11, 2022. Although our investigation did not confirm access to specific information within the account, in an abundance of caution, we conducted a review of the account to determine the type of information contained therein. On September 9, 2022, we completed our review and began confirming address information for potentially impacted individuals.

What Information Was Involved? The type of information in the account included your name and the following: <<b2b_text_2 (data elements)>>.

What We Are Doing. In response to this incident, we changed email account passwords and are reviewing our policies and procedures related to data protection. Additionally, although we have no evidence of misuse of your information as a result of this incident, we are providing you access to 24 months of identity monitoring services at no cost to you.

What You Can Do. Instructions about how to activate the identity monitoring services and additional resources available to you are included in the enclosed *Steps You Can Take to Help Protect Your Information*.

For More Information. We understand you may have questions about this incident. You may contact our dedicated assistance line at [TFN](#), Monday through Friday from 9:00 am to 6:30 pm Eastern Time (excluding major U.S. holidays), or write to us at 226 Causeway Street, Suite 302, Boston, MA 02114.

We sincerely regret any concern this incident may cause you. The privacy and security of information is important to us, and we will continue to take steps to protect information in our care.

Sincerely,

William Cleary, III
President
Cleary Insurance, Inc.

STEPS YOU CAN TAKE TO HELP PROTECT YOUR INFORMATION

Activate Your Identity Monitoring Services

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide identity monitoring at no cost to you for two years. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. 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.

Additional information describing your services is included with this letter.



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.

Monitor Your Accounts

We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your credit reports/account statements for suspicious activity and to detect errors. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit reporting bureaus, TransUnion, Experian, and Equifax. To order your free credit report, visit www.annualcreditreport.com or call 1-877-322-8228. Once you receive your credit report, review it for discrepancies and identify any accounts you did not open or inquiries from creditors that you did not authorize. If you have questions or notice incorrect information, contact the credit reporting bureau.

You 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-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert, 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 lasting seven years. Should you wish to place a fraud alert, please contact any of the three credit reporting bureaus listed below.

As an alternative to a fraud alert, you 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 your 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 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., III, etc.);
2. Social Security number;
3. Date of birth;
4. Address for the prior two to five years;
5. Proof of current address, such as a current utility or telephone bill;
6. A legible photocopy of a government-issued identification card (e.g., state driver's license or identification card); 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 fraud alert or credit freeze, please contact the three major credit reporting bureaus listed below:

<p>TransUnion 1-800-680-7289 www.transunion.com</p>	<p>Experian 1-888-397-3742 www.experian.com</p>	<p>Equifax 1-888-298-0045 www.equifax.com</p>
<p>TransUnion Fraud Alert P.O. Box 2000 Chester, PA 19016-2000</p>	<p>Experian Fraud Alert P.O. Box 9554 Allen, TX 75013</p>	<p>Equifax Fraud Alert P.O. Box 105069 Atlanta, GA 30348-5069</p>
<p>TransUnion Credit Freeze P.O. Box 160 Woodlyn, PA 19094</p>	<p>Experian Credit Freeze P.O. Box 9554 Allen, TX 75013</p>	<p>Equifax Credit Freeze P.O. Box 105788 Atlanta, GA 30348-5788</p>

Additional Information

You can further educate yourself regarding identity theft, fraud alerts, credit freezes, and the steps you can take to protect your personal information by contacting the credit reporting bureaus, the Federal Trade Commission (FTC), or your state Attorney General. The FTC also encourages those who discover that their information has been misused to file a complaint with them. The FTC may be reached at 600 Pennsylvania Ave. NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261.

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, your state Attorney General, and the FTC. This notice has not been delayed by law enforcement.

For Maryland residents, the Maryland Attorney General may be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and www.oag.state.md.us. Cleary Insurance, Inc. may be contacted at 226 Causeway Street, Suite 302, Boston, MA 02114.

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 contacted at 150 South Main Street, Providence, RI 02903; 1-401-274-4400; and www.riag.ri.gov. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 3 Rhode Island residents impacted by this incident.

For Washington, D.C. residents, the District of Columbia Attorney General may be contacted at 441 4th Street NW #1100, Washington, D.C. 20001; 202-727-3400, and <https://oag.dc.gov/consumer-protection>. Cleary Insurance, Inc. may be contacted at 226 Causeway Street, Suite 302, Boston, MA 02114.