Re: Notice of Data Security Incident Involving Your Personal Information

Dear [First Name] [Last Name],

At Noblr Reciprocal Exchange ("Noblr") we take privacy very seriously. It is therefore important that we make you aware of privacy issues that may affect you. Below you will find information about an incident that may have affected your personal information, the steps we are taking to protect your information, and the steps you may want to consider taking as well.

Please note that you may be affected even if you have no relationship with Noblr if your information was used by the attackers in connection with this incident.

Noblr is an insurance reciprocal exchange that maintains a public-facing instant quote feature, which allows anyone to obtain a tailored insurance quote after entering basic personal information. This feature works by taking the information entered into our webform and using it to get additional information from an outside service provider, including driver’s license numbers, about the person whose information was entered. The system automatically gathers the additional information to improve the accuracy of the quote. This incident affected that additional information. Even if you do not have a relationship with Noblr, your information could have been affected if the attackers entered your information, or the information on someone in your household, into the quote platform.

What Happened
On January 21, 2021, Noblr’s web team noticed unusual quote activity consisting of a spike in unfinished quotes through its instant quote webpage. Noblr immediately launched an internal investigation. The initial investigation revealed that attackers may have initiated these quotes in order to steal driver’s license numbers which were inadvertently included in the page source code.

As described above, the instant quote process works by taking personal data (name and date of birth) entered into the system and matching it with related information automatically pulled from a third-party to help provide a quote. The attackers appear to have already been in possession of the names and dates of birth of consumers, and then used that information to obtain additional personal information through Noblr’s instant quote platform. Attackers could also have gone through the entire quote process to access personal information in the final policy application documents provided after obtaining a quote.

On January 25, 2021, following the initial discovery of unusual quote activity, Noblr’s security team began blocking suspicious IP addresses. On January 27, 2021, when Noblr determined that the attackers were able to access driver’s license numbers, Noblr altered its instant quote system to prevent further access by the attackers and took other steps to combat these attacks.
What Information Was Involved
Our records indicate that your name, driver’s license number, and address may have been accessed.

Actions We’ve Taken to Safeguard Your Information
We take our responsibility to safeguard your personal information seriously. We immediately took steps to remedy the situation, including blocking suspicious IP addresses, revising rate limit thresholds to adjust traffic patterns, and altering the instant quote system to mask driver’s license numbers in the source code and in the final application page. In addition, we are developing and employing certain changes to processes and protocols to prevent this type of event from happening again.

Identify Theft Protection Service
To help protect your identity from misuse, we are offering complimentary access to Experian’s® IdentityWorksSM for one year. This product provides you with superior detection and resolution of identity theft. While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian’s® IdentityWorksSM as a complimentary one-year membership.

To start monitoring your personal information, please follow the steps below:

• Ensure that you enroll by: [Date] (Your code will not work after this date.)
• Visit Experian’s website to enroll: https://www.experianidworks.com/credit
• Provide your activation code: [code]

Please do not share this information as these links are exclusive to you and your account.

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian’s® IdentityWorksSM online, please contact Experian’s customer care team at [Experian customer service number] by [Date]. Be prepared to provide engagement number [engagement number] as proof of eligibility for the Identity Restoration services by Experian.

Steps You Can Take for Identity Theft Protection
We encourage you to take advantage of Experian’s® IdentityWorksSM identity theft protection services at no cost to you. In addition, there are other steps you may take to further protect yourself against identity theft or other unauthorized use of your personal information. Information regarding these steps is provided on the attached pages entitled “Steps You May Take to Protect Yourself Against Potential Misuse of Information.”

Contact Information
We wanted you to know the nature and extent of this incident and to make you aware of the steps we are taking to protect your information. If you have questions about anything contained in this letter, please contact us by phone at [Experian customer service number].

Cordially,

Jennifer Lawrence
Chief Legal Officer
**Steps You May Take to Protect Yourself Against Potential Misuse of Information**

We recommend that you regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. You may obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also obtain a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

**Equifax:** P.O. Box 740241, Atlanta, Georgia 30374-0241, 1-800-685-1111, www.equifax.com

**Experian:** P.O. Box 9532, Allen, TX 75013, 1-888-397-3742, www.experian.com

**TransUnion:** P.O. Box 1000, Chester, PA 19022, 1-800-888-4213, www.transunion.com

When you receive your credit reports, review them carefully. Look for accounts or creditor inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number, that is not accurate. If you see anything you do not understand, call the credit reporting agency at the telephone number on the report.

We recommend you remain vigilant with respect to reviewing your account statements and credit reports. We also recommend that you promptly report any suspicious activity or suspected identity theft to the proper law enforcement authorities, including local law enforcement, your state’s attorney general and/or the Federal Trade Commission (FTC). You may contact the FTC or your state’s regulatory authority to obtain additional information about avoiding identity theft.


**Fraud Alerts:** There are also two types of fraud alerts that you can place on your credit report to put your creditors on notice that you may be a victim of fraud: an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least 90 days. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for 7 years. You can place a fraud alert on your credit report by calling the toll-free fraud number of any of the three national credit reporting agencies listed below.

**Equifax:** 1-888-766-0008, www.equifax.com

**Experian:** 1-888-397-3742, www.experian.com

**TransUnion:** 1-800-680-7289, fraud.transunion.com

**Credit Freezes:** You may have the right to put a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze.
Therefore, using a credit freeze may delay your ability to obtain credit. **Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company.** Placing, lifting, and/or removing a credit freeze from your account is completely free and will not affect your credit score. Please contact the three national credit reporting agencies as specified below to find out more information:

**Equifax:** P.O. Box 105788, Atlanta, GA 30348, www.equifax.com

**Experian:** P.O. Box 9554, Allen, TX 75013, www.experian.com

**TransUnion:** P.O. Box 2000, Chester, PA, 19022-2000, freeze.transunion.com

You can obtain more information about fraud alerts and credit freezes by contacting the FTC or one of the three national credit reporting agencies listed above.

The following information should be included when requesting a security freeze (documentation for you and your spouse must be submitted when freezing a spouse’s credit report): full name, with middle initial and any suffixes; Social Security number; date of birth (month, day, and year); current address and previous addresses for the past 5 years; and applicable fee (if any) or incident report or complaint with a law enforcement agency or the Department of Motor Vehicles. The request should also include a copy of a government-issued identification card, such as a driver’s license, state, or military ID card, and a copy of a utility bill, bank, or insurance statement. Each copy should be legible, display your name and current mailing address, and the date of issue (statement dates must be recent).


**For residents of Maryland:** You may also obtain information about preventing and avoiding identity theft from the Maryland Office of the Attorney General: 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.


**For residents of North Carolina:** You may also obtain information about preventing and avoiding identity theft from North Carolina Attorney General’s Office: North Carolina Attorney General’s Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, www.ncdoj.gov.

**For residents of Oregon:** You may also contact the Oregon Office of the Attorney General: Oregon Department of Justice, 1162 Court St. NE, Salem, OR 97301-4096, 1-877-877-9392, help@oregonconsumer.gov, www.doj.state.or.us.

**For residents of Rhode Island:** You also may obtain information about preventing and avoiding identity theft from the Rhode Island Office of the Attorney General at: Rhode Island Office of the Attorney General, Consumer Protection Unit 150 South Main Street, Providence, RI 02903, (401)-274-4400, http://www.riag.ri.gov. You may also be able to file or obtain a police report about this incident.