Dear Mr. Viancourt

Thank you for your request for information relating to certain data breach disclosures that you issued earlier today. You requested links or .pdf documents associated with

Breach/Exposure Entity

Date
Breach Date of
Discovered Breach Reported

Name Breach Info Source 2/3/2017 2/3/2017 http://ago.vermont.go

2/17/2017 INSPERITY LEAF Commercial Capital (subsidiary

of People's United

http://ago.vermont.gov/assets/files/Consumer/Security_Breach/LEAF%20Commercial%20Capital %20Inc.%20SBN%20to%20Consumers.pdf - Link is no longer

2/20/2017 Financial) 2/16/2017 2/16/2017 available

Attached please find the requested documents. Please contact me with any questions. If you believe these documents are incorrect or that documents have been erroneously withheld you may appeal to Chief Deputy Joshua Diamond.

Best Christopher

Christopher J. Curtis Chief Public Protection Division Office of the Attorney General State of Vermont 109 State Street Montpelier VT 05609 802-279-5496

PRIVILEGED & CONFIDENTIAL COMMUNICATION This communication may contain information that is privileged, confidential, and exempt from disclosure under applicable law. DO NOT read, copy or disseminate this communication unless you are the intended addressee. If you are not the intended recipient (or have received this E-mail in error) please notify the sender immediately and destroy this E-mail. Please consider the environment before printing this e-mail.

```
«First_Name» «Last_Name»
«Home_Street_Address_1»
«Home_City», «Home_State» «Home_Zip_Code»
```

Re: Notice of Data Disclosure

Dear «First Name» «Last Name»:

What Happened/What Information Was Involved

We recently had a former client request a report for tax reporting purposes. In responding to this company, a report containing your name, social security number, and address was inadvertently emailed to the president and financial manager of that company on February 3, 2017. Within minutes of receiving the report, the financial manager realized that it was unrelated to their company and immediately notified Insperity that she had received the wrong report. We have conducted an investigation and confirmed with both individuals that they deleted the email containing the report from their inbox and that they did not save, print or make copies of the incorrect report.

For the above reasons, we have no reason to suspect that there has been any misuse of your personal information. We sincerely regret this incident occurred and want to assure you that we are taking steps to prevent a similar incident from occurring in the future.

What We Are Doing

As a precautionary measure, we are offering a two-year service contract with Equifax to you. Please see the information below for steps to take advantage of the Equifax Credit WatchTM Silver offer.

What You Can Do

You should remain vigilant by carefully reviewing account statements and monitoring your credit reports with the major credit reporting agencies. Look for inquiries from creditors that you did not initiate. If you do find suspicious activity, notify your local police or sheriff's office and file a report of identity theft. You may be entitled to a free credit report. You can also obtain information about fraud alerts and security freezes by contacting the credit bureaus at the following addresses:

TransUnion
Fraud Victim Assistance
P.O. Box 2000
Chester, PA 19022-2000
800-916-8800

www.transunion.com

Experian
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com

For other helpful information, you may wish to visit the websites of the consumer protection agency or the Attorney General for your state, or the website of the U.S. Federal Trade Commission. You can contact the Federal Trade Commission at the following address:

Federal Trade Commission 600 Pennsylvania Avenue, NW Washington, DC 20580 1-877-FTC-HELP www.consumer.ftc.gov

For More Information

We encourage you to take advantage of the resources we have made available to protect your identity. If you have any additional questions, please do not hesitate to call me at 909-569-1228.

Sincerely,

Nicole V. Bontempo Manager, HR Services

Enclosure: Equifax Credit Watch Silver Information

Promotion Code for «First_Name» «Last_Name»: «These_promo_codes_must_be_used_by_1231»

We have arranged with Equifax Personal Solutions to help you protect your identity and your credit information at no cost to you. The steps to follow are:

- 1. Enroll in Equifax Credit WatchTM Silver identity theft protection product. This product is being provided to you at no cost for two years and must be redeemed by December 31, 2017.
- 2. Additionally, you may choose to adopt an increased level of protection by placing a fraud alert on your credit file at Equifax and the other two credit reporting agencies

Enroll in Equifax Credit WatchTM Silver

Equifax Credit Watch will provide you with an "early warning system" to changes to your credit file and help you to understand the content of your Equifax credit file. The key features and benefits are listed below.

Equifax Credit Watch provides you with the following benefits:

- o Comprehensive credit file monitoring of your Equifax credit report with daily notification of key changes to your credit file.
- o Wireless alerts and customizable alerts available
- One copy of your Equifax Credit ReportTM
- o \$25,000 in identity theft insurance with \$0 deductible, at no additional cost to you †
- o 24 by 7 live agent Customer Service to assist you in understanding the content of your Equifax credit information, to provide personalize identity theft victim assistance and in initiating an investigation of inaccurate information.
- o 90 day Fraud Alert placement with automatic renewal functionality *

How to Enroll

To sign up online for online delivery go to www.myservices.equifax.com/silver

- 1. <u>Welcome Page</u>: Enter the Activation Code provided at the top of your letter in the "Activation Code" box and click the "Submit" button.
- 2. <u>Register</u>: Complete the form with your contact information (name, gender, home address, date of birth, Social Security Number and telephone number) and click the "Continue" button.
- 3. <u>Create Account</u>: Complete the form with your email address, create a User Name and Password, check the box to accept the Terms of Use and click the "Continue" button.
- 4. <u>Verify ID</u>: The system will then ask you up to four security questions to verify your identity. Please answer the questions and click the "Submit Order" button.
- 5. Order Confirmation: This page shows you your completed enrollment. Please click the "View My Product" button to access the product features.

Directions for placing a Fraud Alert

A fraud alert is a consumer statement added to your credit report. This statement alerts creditors of possible fraudulent activity within your report as well as requests that they contact you prior to establishing any accounts in your name. Once the fraud alert is added to your credit report, all creditors should contact you prior to establishing any account in your name. To place a 90 day

fraud alert on your credit file, log into the Equifax Member Center and click on the fraud alert tab, visit www.fraudalerts.equifax.com or call our auto fraud line at 1-877-478-7625, and follow the simple prompts. Once the fraud alert has been placed with Equifax, a notification will be sent to the other two credit reporting agencies, Experian and Trans Union, on your behalf. Fraud alerts last 90 days unless you manually renew it or use the automatic fraud alert feature within your Credit Watch subscription.

† Identity Theft Insurance underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

This product is not intended for minors (under 18 years of age).

* The Automatic Fraud Alert feature made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC

[LEAF Logo]

February XX, 2017

[First Name] [Last Name] [Street Address] [City], [State] [Zip]

Dear [First Name] [Last Name]:

LEAF is committed to maintaining the privacy and security of our employees' personal information. Regrettably, we are writing to inform you of an incident involving some of that information.

On February 16, 2017, we learned that a targeted "spear phishing" email message had been sent to LEAF that same day. Spear phishing emails are an attempt by an individual or group to solicit personal information from unsuspecting users by employing social engineering techniques. Phishing emails are crafted to appear as if they have been sent from a legitimate organization or known individual. Believing the email to be legitimate, LEAF replied to the message on the day the email was received and attached 2016 Forms W2 for current and former employees, which included your name, address, Social Security Number, and earnings information.

We have notified the FBI, the IRS, and state taxing authorities of the incident. The IRS has indicated to us that they will monitor affected employees' returns for the purposes of attempting to prevent fraudulent tax refunds from being paid out.

We recognize this issue can be frustrating and we are taking steps to help protect you and to safeguard the personal information we receive and maintain going forward. We are offering a two-year membership of Experian's® ProtectMyID® Alert at no cost to you. As explained in the instructions below, this includes ExtendCARE®, which provides you with the same high-level of Fraud Resolution support even after your two-year ProtectMyID membership expires. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft. ProtectMyID Alert is completely free and enrolling in this program will not hurt your credit score. Unfortunately, due to privacy laws, we are not able to enroll you directly. For more information on ProtectMyID Alert and instructions on how to activate your complimentary two-year membership, please see the next page.

This letter includes your unique credit monitoring code. Given this sensitive subject, and for security reasons do not provide this letter to anyone else.

In addition, this incident did <u>not</u> involve any customer information or affect any of our IT systems. Further, we have attached FAQs for your reference. We encourage you to review the FAQs, remain vigilant, and sign up for the Experian services. If you have any questions, please call the toll free number at 844.540.4298, Monday to Friday, from 9:00 a.m. to 6:00 p.m. EST, excluding holidays.

We regret any concern this may cause you. To help prevent something like this from happening again, we are aggressively analyzing where process changes are needed and will take the appropriate actions.

Sincerely,

Aimée Long, SHRM-CP Payroll & HR Specialist

ACTIVATE PROTECTMYID NOW IN THREE EASY STEPS

- 1. ENSURE That You Enroll By: 5/27/2017 (Your code will not work after this date.)
- 2. VISIT the ProtectMyID Web Site to enroll: www.protectmyid.com/redeem
- 3. PROVIDE Your Activation Code: [code]

If you have questions or need an alternative to enrolling online, please call 877-288-8057 and provide engagement #: **PC106664**

ADDITIONAL DETAILS REGARDING YOUR 24-MONTH PROTECTMYID MEMBERSHIP:

A credit card is not required for enrollment.

Once your ProtectMyID membership is activated, you will receive the following features:

- Free copy of your Experian credit report
- Surveillance Alerts for:
 - o **Daily Bureau Credit Monitoring:** Alerts of key changes & suspicious activity found on your Experian, Equifax® and TransUnion® credit reports.
- Identity Theft Resolution & ProtectMyID ExtendCARE: Toll-free access to US-based customer care and a dedicated Identify Theft Resolution agent who will walk you through the process of fraud resolution from start to finish for seamless service. They will investigate each incident; help with contacting credit grantors to dispute charges and close accounts including credit, debit and medical insurance cards; assist with freezing credit files; contact government agencies.
 - It is recognized that identity theft can happen months and even years after a data breach. To
 offer added protection, you will receive ExtendCARETM, which provides you with the same
 high-level of Fraud Resolution support even after your ProtectMyID membership has expired.
- \$1 Million Identity Theft Insurance*: Immediately covers certain costs including, lost wages, private investigator fees, and unauthorized electronic fund transfers.

Activate your membership today at www.protectmyid.com/redeem or call 877-288-8057 to register with the activation code above.

Once your enrollment in ProtectMyID is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8057.

Even if you choose not to take advantage of the identity theft protection services we are offering, we recommend that you remain vigilant to the possibility of fraud and identity theft by reviewing your credit card, bank, and other financial statements for any unauthorized activity. You may also obtain a copy of your credit report, free of charge, directly from each of the three nationwide credit reporting agencies once every 12 months. To order your credit report, please visit www.annualcreditreport.com or call toll free at 877-288-8057. Contact information for the three nationwide credit reporting agencies is as follows:

^{*}Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of AIG. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Equifax P.O. Box 740241 Atlanta, GA 30374 www.equifax.com (800) 685-1111 Experian
P.O. Box 2002
Allen, TX 75013
www.experian.com

(888) 397-3742

TransUnion
P.O. Box 2000
Chester, PA 19016
www.transunion.com
(800) 680-7289

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should contact the Federal Trade Commission and/or the Office of the Attorney General in your home state. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission 600 Pennsylvania Avenue, NW Washington, DC 20580 www.ftc.gov/idtheft (877) 438-4338

You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records.