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August 21, 2020

M. Scott Koller
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VIA E-MAIL (SECURITYBREACH@ATG.WA.GOV)

Office of the Washington Attorney General
Consumer Protection Division
800 5th Ave., Suite 2000
Seattle, WA 98104-3188

Re: Incident Notification

Dear Sir or Madam:

We are writing on behalf of Cetera Financial Group, Inc. (“Cetera”) to notify you of a security incident involving 2,760 Washington residents.

On April 6, 2020, an unauthorized person accessed a Cetera employee’s email account. Cetera detected the unauthorized access immediately and within five minutes secured the account, reset passwords, and initiated an investigation. Cetera’s investigation was unable to confirm that no emails or attachments were viewed by the unauthorized person. Therefore, out of an abundance of caution, Cetera reviewed the entire contents of the email account. Based on this, Cetera determined that emails or attachments in the account contained some personal information, including names, Social Security numbers, driver’s license numbers and financial account information.

On August 21, 2020, Cetera began mailing written notifications to potentially affected individuals, including 2,760 Washington residents who are being notified of the incident in writing in accordance with Wash. Rev. Code § 19.255.010.¹ A sample letter is attached. Cetera is offering the Washington residents whose Social Security number and/or driver’s license number may have been affected a complimentary one-year membership in credit monitoring and identity theft protection services from Experian. Cetera has also provided a telephone number for potentially affected individuals to call with any questions they may have.

¹ This report does not waive Cetera’s objection that Washington lacks personal jurisdiction over this matter.

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To further protect against a similar incident from occurring in the future, Cetera is continuing to implement additional security measures and training and educating employees on information security and data protection.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink that reads "M. Scott Koller". The signature is written in a cursive, slightly slanted style.

M. Scott Koller
Partner

Enclosure



Cetera®

Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

August 21, 2020

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SAMPLE A SAMPLE
APT 123
123 ANY ST
ANYTOWN, US 12345-6789



Dear Sample A Sample:

Cetera Financial Group, Inc. is committed to protecting the confidentiality and security of personal information. We are writing to inform you about an incident that may involve some of your information. This notice explains the incident, measures we have taken and some steps you can take in response.

On April 6, 2020, an unauthorized person accessed a Cetera employee's email account. We detected the unauthorized access immediately and within five minutes secured the account, reset passwords, and initiated an investigation. Our investigation was unable to confirm that no emails or attachments were viewed by the unauthorized person. Therefore, out of an abundance of caution, we reviewed the entire contents of the email account. On June 26, 2020, we determined that emails or attachments in the account contained some of your personal information, including your name, [Extra2].

Although to date we have no evidence that your information has been misused, as a precaution we are notifying you about the incident and we assure you that we take this incident very seriously. We are also offering you a complimentary one-year membership in Experian's® IdentityWorksSM. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks is completely free to you and enrolling in this program will not hurt your credit score. For more information on IdentityWorks, including instructions on how to activate your complimentary one-year membership, as well as some additional steps you can take to help protect yourself, please see the additional information provided with this letter.

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We sincerely regret that this occurred and apologize for any inconvenience or concern. To further protect against a similar incident in the future, we are continuing to implement additional security measures and to train and educate our employees on information security and data protection. If you have any questions, please call (855) 896-4454, Monday – Friday 6:00 a.m. through 8:00 p.m. PST and Saturday/Sunday 8:00 a.m. through 5:00 p.m. PST.

Sincerely,

Joseph Neary

Joseph Neary
Chief Risk Officer

Additional details regarding your 12-MONTH EXPERIAN IDENTITYWORKS Membership

While Identity Restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorksSM as a complimentary one-year membership. This product provides you with identity detection and resolution of identity theft. To start monitoring your personal information please follow the steps below:

- Ensure that you **enroll by**: October 30, 2020 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: **www.experianidworks.com/credit**
- Provide your **activation code**: ABCDEFGHI

If you have questions about the product, need assistance with identity or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (855) 896-4454 by October 30, 2020. Be prepared to provide engagement number ENGAGE# as proof of eligibility for the identity restoration services by Experian.

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information.

* Offline members will be eligible to call for additional reports quarterly after enrolling

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

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ADDITIONAL STEPS YOU CAN TAKE

Even if you choose not to take advantage of this free credit monitoring service, we remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity over the next 12 to 24 months. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

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

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

Fraud Alerts and Credit or Security Freezes:

Fraud Alerts: There are two types of general fraud alerts 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 one year. 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 seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
 - **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, www.transunion.com
 - **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com
- You'll need to supply your name, address, date of birth, Social Security number and other personal information.

After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

Additional information for residents of the following states:

Maryland: The mailing address for Cetera Financial Group, Inc. is 200 N. Pacific Coast Hwy, Suite 1200 El Segundo, CA 90245 (Attn: Legal). You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us

New York: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>

New York State Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

North Carolina: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov

Rhode Island: This incident involves 209 individuals in Rhode Island. Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: *Rhode Island Attorney General's Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov

A Summary of Your Rights Under the Fair Credit Reporting Act: The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- 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 reports to be provided to employers.
- You may limit “prescreened” offers of credit and insurance you get based on information in your credit report.
- You have a right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.

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