

<<Mail ID>>
<<Namel>>
<<Address1>>
<<Address2>>
<<City>>, <<ST>>> <<ZIP>>>
</Country>>

<<Date>>

Dear << Name1>>:

Allow us to follow-up on our earlier contact on June 22nd, 2017, about the incident affecting the security of your personal identifiable information. We already shared a first alert with you, based on the knowledge we had then, to give you the chance to secure your data as best as possible.

What happened?

We discovered a cyberattack on our system on June 6th, 2017. Our forensic team was hired right away to conduct an investigation. This led us to believe cybercriminals attacked the remote-access system, used by our outside IT personnel, to access our tax filing software around that time. This allowed the cybercriminals to access our system and files, including the use of what appears to be one staff's credentials.

We then discovered that the cybercriminals used the information they obtained to attempt to file fictitious Federal tax returns to fraudulently receive refunds. Fortunately, we were able to inform and work with the Internal Revenue Service. Currently, only Federal tax returns were filed. Unfortunately, as we discussed, such fictitious tax returns were filed for you.

What information was involved?

We are notifying you of this incident because your personal identifying information was accessed or obtained by these cybercriminals. Given the nature of our relationship, this information may have included E-file authorization forms, copies of your tax returns, brokerage statements and real estate settlement statements. Documents could include your: full name, telephone number(s), address, Social Security Number, all employment W-2 information if applicable, 1099 information if applicable (which may include account number if provided), direct deposit bank account information (including account number and routing number if provided), email addresses (if provided to us), and supporting records.

What are we doing?

We are continuing to work with the IRS and will be working with law enforcement to resolve the issue. We have taken measures to secure our system and our workstations, and have changed our Federal electronic filing credentials as an added precaution. We have also partnered with Equifax® to provide its Credit Watch™ Silver identity theft protection product for 12 months at no charge to you. A description of this product is provided in the attached material, which also contains instructions about how to enroll (including your personal activation code). If you choose to take advantage of this product, it will provide you with a notification of any changes to your credit information, up to \$25,000 Identity Theft Insurance Coverage and access to your credit report. You must complete the enrollment process by 10/20/2017. We strongly recommend you consider enrolling in this product, at our expense, and review the additional resources enclosed with this letter.

Regardless of whether you choose to take advantage of the identity monitoring services we are offering, given the nature of the information potentially exposed, we strongly recommend the following steps be taken:

- 1. Change all bank account numbers that you have provided to us, or at a minimum monitor all such bank activity. These would include direct deposit and electronic fund transfer account details or scanned copies of bank statements and form 1099's.
- 2. Establish free 90 day fraud alerts with the three credit reporting bureaus. Their telephone numbers and websites are:

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fraud/center.html

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http://www.transunion.com/fraud-victim-resource/place-fraud-alert

- 3. Consider placing a credit freeze on your accounts which will make it more difficult for someone to open an account. For more information visit: https://www.consumer.ftc.gov/articles/0497-credit-freeze-fags.
- 4. If you become a victim of identity theft, file a complaint with the Federal Trade Commission at https://identitytheft.gov and law enforcement. The FTC also provides detailed and specific information about identity theft at their website, which we recommend you review.

Lastly, you are entitled to a free credit report every year from each of the above agencies at: www.annualcreditreport.com.

Want more information?

In our 31 years of business, this is our first direct encounter with cybercrime. Your privacy and security are important to us, and we are taking steps to mitigate the effects of this unauthorized access to our system. Please do not hesitate to reach out to Margie at (559) 627-6142, or call EPIQ at 800-960-8571. You may also contact us at margie@kevinjpalmercpa.com or Kevin J Palmer & Co CPA, 303 E Caldwell Ave, Visalia, CA 93277, with any questions or concerns you may have.

Very truly yours,

We recommend you remain vigilant with respect to reviewing your account statements and credit reports, and promptly report any suspicious activity or suspected identity theft to us and 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.

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

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

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Credit Freezes (for Non-Massachusetts Residents): 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. In addition, you may incur fees to place, lift and/or remove a credit freeze also varies by state, generally \$5 to \$20 per action at each credit reporting company. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:

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





About the Equifax Credit WatchTM Silver identity theft protection product

Equifax Credit Watch will provide you with an "early warning system" to changes to your credit file. Note: You must be over age 18 with a credit file in order to take advantage of the product.

Equifax Credit Watch provides you with the following key features and benefits:

- Comprehensive credit file monitoring and automated alerts of key changes to your **Equifax** credit report
- Wireless alerts and customizable alerts available (available online only)
- One copy of your Equifax Credit ReportTM
- Up to \$25,000 in identity theft insurance with \$0 deductible, at no additional cost to you †
- Live agent Customer Service 7 days a week from 8 a.m. to 3 a.m. to assist you in understanding the content of your Equifax credit information, to provide personalized identity theft victim assistance, and help initiate an investigation of inaccurate information.
- o 90 day Fraud Alert placement with automatic renewal functionality* (available online only)

How to Enroll: To sign up online for **online delivery** go to: www.myservices.equifax.com/silver

- 1. Welcome Page: Enter the Activation Code provided at the top of this page 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.

[†] 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



<<Mail ID>>
Parent of Guardian of <<Namel>>
<<Address1>>
<<Address2>>
<<City>>, <<ST>> <ZIP>
<<Country>>

<<Date>>

Dear Parent of Guardian of << Namel>>:

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What information was involved?

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What are we doing?

We are continuing to work with the IRS and will be working with law enforcement to resolve the issue. We have taken measures to secure our system and our workstations, and have changed our Federal electronic filing credentials as an added precaution. We have also partnered with Equifax® to provide its Equifax Child Identity Monitoring product for 12 months at no charge to you. A description of this product is provided in the attached material, which also contains instructions about how to enroll (including your personal activation code). If you choose to take advantage of this product, it will provide you with a notification of any changes to your credit information, up to \$25,000 Identity Theft Insurance Coverage and access to your credit report. You must complete the enrollment process by 10/20/2017. We strongly recommend you consider enrolling your child in this product, at our expense, and review the additional resources enclosed with this letter.

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



Minor Activation Code: << Insert MINOR Monitoring Code>>

We have arranged with Equifax Personal Solutions to help you protect your minor's personal information at no cost to you.

Enroll in Equifax Child Identity Monitoring

Equifax Child Identity Monitoring will scan the Equifax credit database for any instances of the minor's social security number and look for a copy of the minor's credit file.

- If no SSN match is found and no credit file exists, Equifax will create a credit file in the minor's name and immediately "lock" the credit file. This will prevent access to the minor's information in the future. If someone attempts to use your minor's information to open credit, you will receive an email alert.
- If there is a match and a credit file exists, Equifax will immediately "lock" the file, initiate an investigation into the use of that file and alert you to new attempts to use your minor's information.

How to Enroll for Parents or Guardians:

Parents or guardians – if you have not ordered from Equifax in the past, you will need to create an account with us. Please follow the instructions below. If you have questions for Equifax, you may call the phone number listed in the Equifax Member Center or in the Equifax email communication.

To sign up your child please visit www.myservices.equifax.com/minor

- 1. If you are a parent/guardian who already has an Equifax account, please login using the username and password you created when enrolling in your product.
- 2. If you are a parent/guardian who does not have an Equifax account, below the login screen, you will see text that reads "Don't have an Equifax account? Please click here to create an account." Please click to create your account, and then enter in the parent/guardian information on the screens that follow in order to create an account.
- Select the button for "\$29.95 for 12 months".
- 4. Enter a promotion code to order the first minor product and click "apply code". This will zero out the price of the product. Do not enter credit card information.
- Check the box to agree to the Terms of Use.
- Next, click the "Continue" button.
- You will be prompted to answer certain authentication questions to validate your identity.
- 8. Please review the order and click the "Submit" button.
- You will then see the Order Confirmation. Please note that since you did not enter credit card information you WILL NOT be billed after the 12 months.
- 10. Click "View my Product" which will take you to your Member Center.11. Click the orange button "Enroll Child" to enter your child's information (child's name, Date of Birth and Social Security Number). Note: if you enter the child's SSN incorrectly, you will need to remove the minor by going to your Member Center and clicking on "My Account" to remove the minor from monitoring the account. You may then re-enroll the minor with the correct SSN.
- 12. Check the box confirming you are the child's parent or guardian.
- 13. Click "Submit" to enroll your child.
- 14. If you are enrolling multiple minors, please log out, then repeat the above process to add another minor.



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- Wireless alerts and customizable alerts available (available online only)
- One copy of your Equifax Credit ReportTM
- Up to \$25,000 in identity theft insurance with \$0 deductible, at no additional cost to you †
- Live agent Customer Service 7 days a week from 8 a.m. to 3 a.m.to assist you in understanding the content of your Equifax credit information, to provide personalized identity theft victim assistance, and help initiate an investigation of inaccurate information.
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<Mail ID>>
Parent of Guardian of <<Name1>>
<<Address1>>
<<Address2>>
<<City>>, <<ST>>> <<ZIP>>
<<Country>>

<<Date>>

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We then discovered that the cybercriminals used the information they obtained to attempt to file fictitious Federal tax returns to fraudulently receive refunds. Fortunately, we were able to inform and work with the IRS, as so far only Federal tax returns were filed. We have found *no* evidence that fraudulent tax returns were filed for your child.

What information was involved?

We are notifying you of this incident because your child's personal identifying information may have been accessed or obtained by these cybercriminals. Given the nature of our relationship, this information may have included E-file authorization forms, copies of your tax returns, brokerage statements and real estate settlement statements. Documents could include your child's: full name, telephone number(s), address, Social Security Number, any employment W-2 information if applicable, any 1099 information if applicable (which may include account number if provided), direct deposit bank account information (including account number and routing number if provided), email addresses (if provided), and supporting records.

What are we doing?

We are continuing to work with the IRS and will be working with law enforcement to resolve the issue. We have taken measures to secure our system and our workstations, and have changed our Federal electronic filing credentials as an added precaution. We have also partnered with Equifax® to provide its Equifax Child Identity Monitoring product for 12 months at no charge to you. A description of this product is provided in the attached material, which also contains instructions about how to enroll (including your personal activation code). If you choose to take advantage of this product, it will provide you with a notification of any changes to your credit information, up to \$25,000 Identity Theft Insurance Coverage and access to your credit report. You must complete the enrollment process by 10/20/2017. We strongly recommend you consider enrolling your child in this product, at our expense, and review the additional resources enclosed with this letter.

Regardless of whether you choose to take advantage of the identity monitoring services we are offering, given the nature of the information potentially exposed, we strongly recommend the following steps be taken:

- 1. Change all bank account numbers that you have provided to us, or at a minimum monitor all such bank activity. These would include direct deposit and electronic fund transfer account details or scanned copies of bank statements and form 1099's.
- 2. Establish free 90 day fraud alerts with the three credit reporting bureaus. Their telephone numbers and websites are:

Equifax
P.O. Box 740241
Atlanta, GA 30374
1-888-766-0008
https://www.alerts.equifax.com/
AutoFraud_Online/jsp/
fraudAlert.jsp

Experian
P.O. Box 2104
Allen, TX 75013
1-888-397-3742
https://www.experian.com/
fraud/center.html

TransUnion
P.O. Box 2000
Chester, PA 19022
1-800-680-7289
http://www.transunion.com/fraud-victim-resource/place-fraud-alert

- 3. Consider placing a credit freeze on your accounts which will make it more difficult for someone to open an account. For more information visit: https://www.consumer.ftc.gov/articles/0497-credit-freeze-fags.
- 4. If you or a family member become a victim of identity theft, file a complaint with the Federal Trade Commission at https://identitytheft.gov and law enforcement. The FTC also provides detailed and specific information about identity theft at their website, which we recommend you review.

Lastly, you are entitled to a free credit report every year from each of the above agencies at: www.annualcreditreport.com.

Want more information?

In our 31 years of business, this is our first direct encounter with cybercrime. Your privacy, security, and your child's data are important to us, and we are taking steps to mitigate the effects of this unauthorized access to our system. Please do not hesitate to reach out to Margie at (559) 627-6142, or call EPIQ at 800-960-8571. You may also contact us at margie@kevinjpalmercpa.com or Kevin J Palmer & Co CPA, 303 E Caldwell Ave, Visalia, CA 93277, with any questions or concerns you may have.

Very truly yours,

We recommend you remain vigilant with respect to reviewing your account statements and credit reports, and promptly report any suspicious activity or suspected identity theft to us and 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.

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

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 the 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

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 seven 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 (for Non-Massachusetts Residents): 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. In addition, you may incur fees to place, lift and/or remove a credit freeze also varies by state, generally \$5 to \$20 per action at each credit reporting company. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies 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 LLC: P.O. Box 2000, Chester, PA, 19022-2000, freeze transunion.com



Minor Activation Code: << Insert MINOR Monitoring Code>>

We have arranged with Equifax Personal Solutions to help you protect your minor's personal information at no cost to you.

Enroll in Equifax Child Identity Monitoring

Equifax Child Identity Monitoring will scan the Equifax credit database for any instances of the minor's social security number and look for a copy of the minor's credit file.

- If no SSN match is found and no credit file exists, Equifax will create a credit file in the minor's name and immediately "lock" the credit file. This will prevent access to the minor's information in the future. If someone attempts to use your minor's information to open credit, you will receive an email alert.
- If there is a match and a credit file exists, Equifax will immediately "lock" the file, initiate an investigation into the use of that file and alert you to new attempts to use your minor's information.

How to Enroll for Parents or Guardians:

Parents or guardians – if you have not ordered from Equifax in the past, you will need to create an account with us. Please follow the instructions below. If you have questions for Equifax, you may call the phone number listed in the Equifax Member Center or in the Equifax email communication.

To sign up your child please visit www.myservices.equifax.com/minor

- 1. If you are a parent/guardian who already has an Equifax account, please login using the username and password you created when enrolling in your product.
- 2. If you are a parent/guardian who does not have an Equifax account, below the login screen, you will see text that reads "Don't have an Equifax account? Please click here to create an account." Please click to create your account, and then enter in the parent/guardian information on the screens that follow in order to create an account.
- Select the button for "\$29.95 for 12 months".
- 4. Enter a promotion code to order the first minor product and click "apply code". This will zero out the price of the product. Do not enter credit card information.
- Check the box to agree to the Terms of Use.
- Next, click the "Continue" button.
- You will be prompted to answer certain authentication questions to validate your identity.
- 8. Please review the order and click the "Submit" button.
- You will then see the Order Confirmation. Please note that since you did not enter credit card information you WILL NOT be billed after the 12 months.
- 10. Click "View my Product" which will take you to your Member Center.11. Click the orange button "Enroll Child" to enter your child's information (child's name, Date of Birth and Social Security Number). Note: if you enter the child's SSN incorrectly, you will need to remove the minor by going to your Member Center and clicking on "My Account" to remove the minor from monitoring the account. You may then re-enroll the minor with the correct SSN.
- 12. Check the box confirming you are the child's parent or guardian.
- 13. Click "Submit" to enroll your child.
- 14. If you are enrolling multiple minors, please log out, then repeat the above process to add another minor.



<<Mail ID>>
<<Namel>>
<<Address1>>
<<Address2>>
<<City>>, <<ST>> <<ZIP>>>
<<Country>>

<<Date>>

Dear << Name1>>:

We are writing to provide you information regarding a data incident that impacted our office.

What happened?

We discovered a cyberattack on our system on June 6th, 2017. Our forensic team was hired right away to conduct an investigation. This led us to believe cybercriminals attacked the remote-access system, used by our outside IT personnel, to access our tax filing software around that time. This allowed the cybercriminals to access our system and files, including the use of what appears to be one staff's credentials.

We then discovered that the cybercriminals used the information they obtained to attempt to file fictitious Federal tax returns to fraudulently receive refunds. Fortunately, we were able to inform and work with the IRS, as so far only Federal tax returns were filed. We have found *no* evidence that fraudulent tax returns were filed for you.

What information was involved?

We are notifying you of this incident because your personal identifying information may have been accessed or obtained by these cybercriminals. Given the nature of our relationship, this information may have included E-file authorization forms, copies of your tax returns, brokerage statements and real estate settlement statements. Documents could include your: full name, address, Social Security Number and email address for each individual (if provided to us), and supporting records.

What are we doing?

We are continuing to work with the IRS and will be working with law enforcement to resolve the issue. We have taken measures to secure our system and our workstations, and have changed our Federal electronic filing credentials as an added precaution. We have also partnered with Equifax® to provide its Credit Watch™ Silver identity theft protection product for 12 months at no charge to you. A description of this product is provided in the attached material, which also contains instructions about how to enroll (including your personal activation code). If you choose to take advantage of this product, it will provide you with a notification of any changes to your credit information, up to \$25,000 Identity Theft Insurance Coverage and access to your credit report. You must complete the enrollment process by 10/20/2017. We strongly recommend you consider enrolling in this product, at our expense, and review the additional resources enclosed with this letter.

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http://www.transunion.com/
fraud-victim-resource/
place-fraud-alert

- 3. Consider placing a credit freeze on your accounts which will make it more difficult for someone to open an account. For more information visit: https://www.consumer.ftc.gov/articles/0497-credit-freeze-fags.
- 4. If you or a family member become a victim of identity theft, file a complaint with the Federal Trade Commission at https://identitytheft.gov and law enforcement. The FTC also provides detailed and specific information about identity theft at their website, which we recommend you review.

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Very truly yours,

We recommend you remain vigilant with respect to reviewing your account statements and credit reports, and promptly report any suspicious activity or suspected identity theft to us and 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.

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

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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

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



About the Equifax Credit WatchTM Silver identity theft protection product

Equifax Credit Watch will provide you with an "early warning system" to changes to your credit file. Note: You must be over age 18 with a credit file in order to take advantage of the product.

Equifax Credit Watch provides you with the following key features and benefits:

- Comprehensive credit file monitoring and automated alerts of key changes to your **Equifax** credit report
- Wireless alerts and customizable alerts available (available online only)
- One copy of your Equifax Credit ReportTM
- Up to \$25,000 in identity theft insurance with \$0 deductible, at no additional cost to you †
- Live agent Customer Service 7 days a week from 8 a.m. to 3 a.m.to assist you in understanding the content of your Equifax credit information, to provide personalized identity theft victim assistance, and help initiate an investigation of inaccurate information.
- o 90 day Fraud Alert placement with automatic renewal functionality* (available online only)

How to Enroll: To sign up online for **online delivery** go to: www.myservices.equifax.com/silver

- 1. Welcome Page: Enter the Activation Code provided at the top of this page 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.

[†] 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