



JOSH STEIN  
ATTORNEY GENERAL

STATE OF NORTH CAROLINA  
DEPARTMENT OF JUSTICE  
9001 MAIL SERVICE CENTER  
RALEIGH, NORTH CAROLINA 27699-9001  
WWW.NCDOJ.GOV

CONSUMER PROTECTION  
TOLL-FREE IN NC: 877.566.7226  
OUTSIDE OF NC: 919.716.6000  
FAX: 919.716.6050

September 11, 2017

Phyllis Sumner, Esq.  
King & Spalding LLP  
1180 Peachtree Street, N.E.  
Atlanta, GA 30309

**RE: Equifax Inc. Security Breach**

Dear Ms. Sumner:

The North Carolina Attorney General's office is very concerned about the recently reported data breach involving Equifax where information gathered on millions of consumers was exposed. This incident is alarming given, among other things, the nature of the information involved, and it raises significant questions about the effectiveness of Equifax's security measures to protect the private information that it collects and stores.

We need detailed information from Equifax as soon as possible regarding certain key facts, including how the breach occurred, what remedial steps Equifax has taken in response to this incident, and how Equifax is handling mitigation for consumers. Accordingly, we are requesting that you provide answers to the following questions:

1. Describe in detail the facts and circumstances of the breach incident, including when and how Equifax learned of the breach, any vulnerability that was exploited in connection with the breach, Equifax's efforts to investigate and mitigate thereafter, and why there was a delay in notification about the incident. In your response, please include a detailed timeline indicating the progression of said events.
2. Identify the categories of consumer personal information that were subject of the 2017 breach incident.
3. Describe the databases that were impacted in the 2017 breach incident and the information stored and maintained in those databases.
4. Describe any and all safeguards Equifax had in place to prevent unauthorized access to consumer personal information. In your response, please include any and all information pertaining to safeguards regarding encryption technologies and password hashing techniques.
5. Provide copies of all policies and procedures in place at Equifax at the time of the 2017 breach incident regarding any operating system or application software patch management.

6. Provide a copy of any internal or third party investigative reports, forensic reports, or audits, performed by or for Equifax pertaining to this breach.
7. Describe in detail the accuracy of the information provided to consumers who enter their last name and last six digits of their Social Security Number into the [www.equifaxsecurity2017.com](http://www.equifaxsecurity2017.com) in order to determine the potential for impact.
8. Describe in detail how information on a consumers' potential impact could change depending on the device used at [www.equifaxsecurity2017.com](http://www.equifaxsecurity2017.com) to check the potential for impact.
9. Indicate whether there will be any waiver of fees normally collected for consumers that request a security freeze from Equifax.
10. Indicate whether Equifax will reimburse consumers who choose to request a security freeze from other credit reporting agencies.
11. Describe in detail the credit monitoring and credit report lock Equifax is offering to consumers, including but not limited to the terms and conditions of those services. Include in your response what information is collected from a consumer immediately to start the service and what happens at the end of the term of the free service.
12. Provide a copy of any exhibits referenced in the letter attached to the online breach notice submitted through the North Carolina Attorney General's website as there were no exhibits uploaded.
13. Provide a copy of the direct mail notice letter(s) that will be or has been sent to consumers whose credit card numbers or dispute documents with personal identifying information were impacted by the 2017 breach incident.

Please provide the above requested information no later than September 21, 2017. If Equifax does not provide the information voluntarily, our office has the authority to compel information via a civil investigative demand.

Thank you for your attention to this matter. If you have any questions, feel free to contact me directly at 919-716-6013 or [kdarruda@ncdoj.gov](mailto:kdarruda@ncdoj.gov).

Sincerely,



Kimberley A. D'Arruda  
Special Deputy Attorney General