

JOSH STEIN
ATTORNEY GENERAL



REPLY TO:
KIMBERLEY A. D'ARRUDA
PHONE: 919-716-6013
FAX: 919-716-6050
EMAIL: KDARRUDA@NCDOJ.GOV

September 28, 2017

Experian Data Corp.
c/o Jason Engel
475 Anton Blvd.
Costa Mesa, CA 92626

RE: Experian data security

Dear Mr. Engel:

In light of the recent and extremely concerning Equifax security breach, I am writing to request that Experian provide the North Carolina Attorney General's office with information related to its own data security procedures and practices. The Equifax incident is alarming given the amount of consumer information exposed and the nature of the information involved. Because Experian, as an entity engaged in the same type of credit reporting business as Equifax, collects the same type of information on consumers as Equifax, we believe it is appropriate to request that Experian provide us with information regarding steps it is taking to prevent security breaches.

Furthermore, we urge Experian to examine its current security procedures to determine if they are sufficient and suitable to protect consumers' personal information. It is vitally important that the safety tools and technology in place are up-to-date, utilizing any available safety measures, and that any vulnerabilities are patched as soon as possible to prevent another disastrous data breach.

In addition, recent reports have indicated that security freeze PINs can be requested to unfreeze Experian security freezes using the information obtained from the other security breaches. Security freezes are a valuable resource for consumers in order to lock down access to their credit reports in the wake of the Equifax and other breaches. It is troubling to hear about the ease with which unscrupulous people could obtain the key needed to unlock those freezes.

Regarding Experian's current security technology and procedures, including Experian's security freeze PIN request process, we are requesting that you answer the following questions and provide the following information.

September 28, 2017

Page 2

1. Describe any and all safeguards Experian has in place to prevent unauthorized access to consumer personal information. Please include in your response any and all information pertaining to safeguards regarding encryption technologies and password hashing techniques.
2. When were Experian's current security measures last updated and/or patched? Please include in your response information regarding the last time the system was updated or patched as well as copies of all policies and procedures in place at Experian regarding any operating system or application software patch management.
3. What information is required for a consumer to request the PIN needed to unfreeze the Experian credit report? What is Experian's process when someone requests a PIN? Will Experian be modifying its PIN request process to strengthen the identity verification? Please include in your response information about any current identity verification processes Experian utilizes when someone requests a PIN, additional identity verification processes being considered, and how the PIN is communicated to the person requesting the PIN.

Please provide the above requested information no later than October 13, 2017. 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.

Sincerely,



Kimberley A. D'Arruda
Special Deputy Attorney General