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II. DEFENDANT

11 **2.1** Defendant, Uber Technologies, Inc. (“Uber”) is a Delaware corporation with its
12 principal place of business at 1455 Market Street, No. 400, San Francisco, California. Uber is
13 registered with the Washington Secretary of State.

14 **2.2** Uber is in the business of connecting drivers with passengers who are looking for
15 vehicles for hire. Uber transacts or has transacted business in the state of Washington.

16 **2.3** When used in this Complaint, “Uber Technologies, Inc.,” “Uber,” and
17 “Defendant” refer to Uber Technologies, Inc. and its agents, servants, employees, or
18 representatives.

III. JURISDICTION AND VENUE

19 **3.1** The State files this Complaint and institutes these proceedings under RCW 19.86
20 and RCW 19.255.

21 **3.2** The Defendant engaged in the conduct set forth in this Complaint in King County
22 and elsewhere in the state of Washington.

23 **3.3** Venue is proper in King County pursuant to RCW 4.12.020.

IV. NATURE OF TRADE OR COMMERCE

24 **4.1** Defendant is now, and has been at all times relevant to this lawsuit, engaged in
25 trade or commerce within the meaning of RCW 19.86.020.

26 **4.2** Uber is a ride hailing service that connects drivers with passengers who are
looking for a vehicle for hire. Uber markets its ride hailing service to passengers and drivers,
including through a website it operates, www.uber.com. Drivers and passengers are consumers
of Uber’s ride hailing service.

4.3 Uber operates its ride hailing service by means of a mobile software application
 (“App”) that connects drivers and passengers. Uber markets different versions of the App to
 drivers and passengers. As part of the services it provides, Uber collects information about
 drivers and passengers, including personally identifiable information such as names, addresses,

EXHIBIT A



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November 21, 2017

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

Email Address: *SecurityBreach@atg.wa.gov*

Re: Notification of Security Breach

To Whom It May Concern:

On behalf of our client Uber Technologies, Inc. (“Uber”), we are writing to notify you of a data security incident.

In November 2016, Uber was contacted by an individual who claimed he had accessed Uber user information. Uber investigated and determined that the individual and another person working with him had obtained access to certain stored copies of Uber databases and files located on Uber’s private cloud data storage environment on Amazon Web Services. Uber determined the means of access, shut down a compromised credential, and took other steps intended to confirm that the actors had destroyed and would not use or further disseminate the information. Uber also implemented additional measures to improve its security posture. To the best of Uber’s knowledge, the unauthorized actor’s access to this data began on October 13, 2016, and there was no further access by the actor to Uber’s data after November 15, 2016.

As determined by Uber and outside forensic experts, the accessed files contained user information that Uber used to operate the Uber service. Most of this information does not trigger data breach notifications under state law. However, the files did include, for a subset of users in the files, the names and driver’s license numbers of about 600,000 Uber drivers in the United States, including at least 10,888 drivers in Washington (we will update this number in the next few days after the mailing count is finalized).¹ Beginning on November 22, 2017, Uber is providing notice to the individuals whose driver’s license information was downloaded in this incident. Uber will offer 12 months of credit monitoring and identity theft protection services to these individuals free of charge, and the notice will provide information on how to use such services. A copy of the notice is enclosed.

¹ The files also included other types of data and salted and hashed user passwords, but they do not trigger notification.

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As it has publicly announced today, Uber now thinks it was wrong not to provide notice to affected users at the time. Accordingly, Uber is now providing notice. In order to treat its driver partners consistently throughout the United States, Uber is providing notice to affected drivers in all states without regard to whether the facts and circumstances of this incident (or the number of affected individuals) trigger notification in each particular state.

Uber is taking personnel actions with respect to some of those involved in the handling of the incident. In addition, Uber has implemented and will implement further technical security measures, including improvements related to both access controls and encryption.

Uber sincerely regrets that this incident occurred. It is committed to working with your office to address this matter. Please do not hesitate to contact me with any questions or for more information. My contact information is above.

Very truly yours,



Rebecca S. Engrav

Attachment