

# EXHIBIT 2

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION**

In re YAHOO! INC. CUSTOMER DATA  
BREACH SECURITY LITIGATION

No. 16-md-02752-LHK

**DECLARATION OF ALLCLEAR ID**

I, James “Bo” Holland, do hereby declare as follows:

1. I am an Executive and Chief Executive Officer with the company AllClear ID, Inc. (“AllClear ID”).
2. AllClear ID is an industry leader and trusted partner with more than 10 years of specialized experience in data breach response. AllClear ID also offers identity theft protection services to consumers who have been the victim of a data breach or who have natural concerns regarding the security of their personal data.
3. AllClear ID reassures consumers affected in a data event that if they have questions or concerns about the security of their identities, AllClear ID will provide informative, expert support. Whether a consumer’s identity has been stolen or the consumer is worried about potential risks, AllClear ID will be an advocate in helping to answer the consumer’s questions and fears or helping to resolve any resulting issue for the consumer.
4. AllClear ID sends and collects thousands of feedback surveys each month after each completed customer interaction. Throughout the years of supporting consumers, AllClear ID has consistently maintained a 96% customer satisfaction rating along with 100% success

1 resolving financial identity theft cases. Our fraud investigators are licensed by the State of Texas  
2 and offer nationwide assistance to consumers impacted with fraud by helping to repair their credit  
3 through disputes with creditors to ensure they are not held liable and all damage is restored.

4 5. AllClear ID has won 33 Stevie awards for outstanding customer service – more  
5 than any other identity protection company. The Stevie Awards are international in scope and  
6 include companies from every industry. In March 2020, AllClear ID won two additional awards  
7 bringing the cumulative total to 33 customer service awards for our service platform and our  
8 support agents.

9 6. AllClear ID utilizes the Net Promoter Score (NPS) system to collect feedback from  
10 our clients and has averaged above a 70 NPS score for all clients combined. (World-class service  
11 is considered 70 and above).

12 7. AllClear ID has serviced and successfully responded to several of the world's  
13 largest data breaches & class action settlements, including Anthem, Home Depot, HealthNet, and  
14 Sony.

15 8. AllClear ID maintains an A+ BBB rating with no published complaints since 2018  
16 with all prior complaints having been resolved.

17 9. AllClear ID provides a comprehensive Credit Monitoring product that includes  
18 Triple Bureau Monitoring and a secure two-factor phone call alerting system when any of the  
19 bureaus report activity.

20 10. AllClear ID maintains a strong security and privacy policy posture and utilizes a  
21 clear process that must be followed in order for a consumer to have their data deleted –  
22 importantly, the process requires that the consumer first be authenticated so that we do not act on  
23 instructions from a bad actor requesting deletion of consumer data without that consumer's  
24 knowledge.

25 11. AllClear ID's Identity Monitoring also monitors critical pieces of valuable identity  
26 information (credit cards, emails, and passwords, etc) and alerts when the information is  
27 actionable.

28 12. Currently, the number of persons receiving monitoring from AllClear ID is

1 2,228,748.

2 I declare under penalty of perjury under the laws of the United States that the foregoing is  
3 true and correct.

4 DATED this 17<sup>th</sup> day of March 2020 in the City of Austin, State of Texas

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DocuSigned by:  
*Bo Holland*  
James \_\_\_\_\_  
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