

**CONFIDENTIAL TREATMENT REQUESTED PURSUANT TO NEW  
HAMPSHIRE LAW**

New Hampshire Office of the Attorney General

VIA EMAIL  
**attorneygeneral@doj.nh.gov**

Re: Security Incident Notice

Dear Sir or Madam:

Please allow this letter to serve as Jackson National Life Insurance Company's ("Jackson") notification pursuant to N.H. Rev. Stat. § 359-C:20, in connection with a global data security incident involving the MOVEit Transfer file-transfer software ("MOVEit").

Nature of the Incident and Overview of the Investigation

Progress Software Corporation disclosed a zero-day vulnerability, which is a previously unknown flaw, in its MOVEit software that could enable malicious actors to gain unauthorized access to sensitive files and information. MOVEit is now the subject of a widely reported cybersecurity event impacting numerous organizations and governmental agencies.

In June 2023, Jackson determined that certain information at one of its third-party vendors, Pension Benefit Information, LLC ("PBI"), was impacted by this event ("PBI Incident"). Like many other insurance carriers, Jackson uses PBI to satisfy Jackson's regulatory obligations to search various databases to determine the death of certain life insurance policyholders and annuity contract holders. According to PBI, an unknown actor exploited the MOVEit vulnerability to access PBI's systems on May 29 and 30, 2023 and downloaded certain data. That downloaded data included the

PBI has informed Jackson that PBI has rectified the MOVEit vulnerability.

PBI confirmed to Jackson that PBI has rectified the MOVEit vulnerability, which is supported by an assurance report from Kroll Inc. ("Kroll"), a financial and risk advisory firm. Jackson is not aware of any identity theft or fraud because of the PBI Incident. No other systems or software were affected by this incident, and there was no interruption of Jackson's business operations.

Additionally, in July 2023, Jackson determined that certain information at one of its third-party insurance administrators, Swiss Reinsurance Company Ltd. ("Swiss Re") was also impacted by the PBI Incident. Swiss Re utilizes a separate third-party administrator, NTT Data Group Corporation ("NTT"), to administer certain insurance business on behalf of Jackson and utilizes PBI to satisfy the same legal obligations regarding life insurance policyholders and annuity contract holders as described above.

Separately, Jackson also experienced unauthorized access to two of its servers as a result of the MOVEit zero-day vulnerability ("Jackson Incident"). However, the scope and nature of the data accessed on those servers was significantly less than the PBI Incident and did not constitute a separate, reportable incident under New Hampshire law. In June 2023, Jackson, with the assistance of third-party cybersecurity specialists, promptly launched an investigation into the unauthorized access, secured Jackson's servers, patched the identified MOVEit vulnerability, and conducted a forensic analysis. Jackson also notified the Federal Bureau of Investigations ("FBI"), Jackson's primary insurance regulators, and the general public

through an 8-K filing with the Securities Exchange Commission (“SEC”) regarding both the PBI and Jackson Incidents.

As part of the investigation, Jackson determined that a subset of personal information relating to certain individuals, including certain customers of Jackson, was obtained from the two affected servers beginning on or about May 29, 2023. Written notification to those individuals has been provided as required by state law. The information acquired was not considered personal information as defined by N.H. Rev. Stat. § 359-C:19. Therefore, Jackson did not send any notifications to New Hampshire residents in association with this incident. No other systems or software were affected by this incident, and there was no interruption of Jackson’s business operations. Jackson received assurance from an independent cybersecurity forensic specialist that it performed the necessary remediation based on the Jackson Incident. Jackson is not aware of any identity theft or fraud because of the Jackson Incident.

#### NH Residents Affected by PBI Incident

The PBI Incident involved the personal information of 52 New Hampshire residents. For Jackson customers impacted by the PBI incident, PBI, on behalf of Jackson, has engaged Kroll to provide a notification letter via regular mail. The mailings will be conducted on a rolling basis and began on July 24, 2023 and will continue through the week of July 31, 2023. Additionally, PBI, on behalf of Swiss Re, has also engaged Kroll to provide notifications to Jackson customers impacted by the PBI Incident. A sample of the notification letters are attached. For New Hampshire residents affected by the PBI incident, the notification letter will provide \_\_\_\_\_ of credit monitoring and identity theft protection services at no cost to the individuals.

#### Contact Information

Should you have any questions or if any additional information is needed, please contact me at [regulatoryinquiries@jackson.com](mailto:regulatoryinquiries@jackson.com).

Sincerely,

Ken Bauman  
Associate General Counsel  
Jackson National Life Insurance Company



<<Date>> (Format: Month Day, Year)

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Dear

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Pension Benefit Information, LLC ("PBI") provides audit and address research services for insurance companies, pension funds, and other PBI is providing notice of a third-party software event that may affect the security of some of your information that Jackson provided to us. Although we have no indication of identity theft or fraud in relation to this event, we are providing you with information about the event, our response, and additional measures you can take to help protect your information, should you feel it appropriate to do so.

**What Happened?** On or around May 31, 2023, Progress Software, the provider of MOVEit Transfer software disclosed a vulnerability in their software that had been exploited by an unauthorized third party. PBI utilizes MOVEit in the regular course of our business operations to securely transfer files. PBI promptly launched an investigation into the nature and scope of the MOVEit vulnerability's impact on our systems. Through the investigation, we learned that the third party accessed one of our MOVEit Transfer servers on May 29, 2023 and May 30, 2023 and downloaded data. We then conducted a manual review of our records to confirm the identities of individuals potentially affected by this event and their contact information to provide notifications. We completed this review and provided a list to Jackson of their impacted customers on or around June 20, 2023.

**What Information Was Involved?** Our investigation determined that the following types of information related to you were present in the server at the time of the event:

**What We Are Doing.** We take this event and the security of information in our care seriously. Upon learning about this vulnerability, we promptly took steps to secure servers, investigate, assess the security of our systems, and notify potentially affected customers and individuals associated with those customers. In response to this event, we are also reviewing and enhancing our information security policies and procedures.

While we are unaware of any identity theft or fraud as a result of this event, as an additional precaution, PBI is offering you access to of complimentary credit monitoring and identity restoration services through Kroll. Details of this offer and instructions on how to activate these services are enclosed with this letter.

**What You Can Do.** We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors. Please also review the enclosed *Steps You Can Take to Protect Personal Information*, which contains information on what you can do to safeguard against possible misuse of your information. You can also enroll in the credit monitoring services that we are offering.

**For More Information.** If you have additional questions, you may call our toll-free assistance line at Monday through Friday from 9:00 am to 6:30 pm Eastern time (excluding U.S. holidays). You may also write to PBI at 333 South Seventh Street, Suite 2400, Minneapolis, MN 55402.

Sincerely,

John Bikus  
President  
Pension Benefit Information, LLC

## Steps You Can Take To Protect Personal Information

### Enroll in Kroll's Monitoring Services

To help relieve concerns and restore confidence following this event, we have secured the services of Kroll to provide identity monitoring at no cost to you for Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.<sup>1</sup>

Visit to activate and take advantage of your identity monitoring services.  
*You have until* *to activate your identity monitoring services.*  
Membership Number:

For more information about Kroll and your Identity Monitoring services, you can visit [info.krollmonitoring.com](http://info.krollmonitoring.com).

### Additional Information

- **Single Bureau Credit Monitoring.** You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.
- **Fraud Consultation.** You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.
- **Identity Theft Restoration.** If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

### Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order a free credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their credit report.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a one-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;

<sup>1</sup>Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

6. A legible photocopy of a government-issued identification card (state driver's license or ID card, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

<b>Equifax</b>	<b>Experian</b>	<b>TransUnion</b>
<a href="https://www.equifax.com/personal/credit-report-services/">https://www.equifax.com/personal/credit-report-services/</a>	<a href="https://www.experian.com/help/">https://www.experian.com/help/</a>	<a href="https://www.transunion.com/credit-help">https://www.transunion.com/credit-help</a>
1-888-298-0045	1-888-397-3742	1-800-916-8800
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

### **Additional Information**

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state attorney general. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580; [www.identitytheft.gov](http://www.identitytheft.gov); 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state attorney general. This notice has not been delayed by law enforcement.

*For District of Columbia residents*, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; 202-727-3400; and [oag.dc.gov](http://oag.dc.gov).

*For Maryland residents*, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

*For New Mexico residents*, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active-duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage consumers to review their rights pursuant to the Fair Credit Reporting Act by visiting [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf), or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

*For New York residents*, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov>.

*For North Carolina residents*, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and [www.ncdoj.gov](http://www.ncdoj.gov).

*For Rhode Island residents*, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; [www.riag.ri.gov](http://www.riag.ri.gov); and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. [There are approximately 6400 Rhode Island residents that may be impacted by this event.](#)