



Northwestern Mutual®

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CONSUMER PROTECTION
Response

February 16, 2024

Office of the Attorney General
Consumer Protection Bureau
33 Capitol St.
Concord, NH 03301

To Whom It May Concern:

On behalf of The Northwestern Mutual Life Insurance Company ("NM"), and pursuant to N.H. Rev. Stat. Ann. § 359-C:20(I)(B), this letter provides notice of a cybersecurity incident potentially impacting data maintained by Infosys McCamish Systems, LLC ("IMS") a subsidiary of Infosys BPM Limited (a wholly owned subsidiary of Infosys Limited). IMS provides services to NM's service provider, The Newport Group, Inc. ("Newport"). Newport administers NM-sponsored deferred compensation plans.

On Monday, January 29, 2024, NM was informed by Newport that some data about individuals eligible to participate in the NM-sponsored deferred compensation plans that Newport had provided to its vendor, IMS, may have been compromised by a cybersecurity event involving an unauthorized third-party's access of IMS systems. However, at this time, Newport has indicated IMS has not yet confirmed whether any personal information (including personal information of individuals eligible to participate in the NM-sponsored deferred compensation plans) was impacted in the incident. Newport has confirmed IMS's investigation is ongoing, and NM is proactively monitoring and prepared to respond as new information from Newport or IMS becomes available to us.

While Northwestern Mutual has not received confirmation whether personal information of individuals eligible to participate in the NM-sponsored deferred compensation plans or others was impacted in the IMS security incident, on January 29, 2024, Newport provided Northwestern Mutual a listing of the names and addresses of individuals whose information may have been impacted. Newport has also offered, and we have agreed, that proactive notification, along with an offer of free credit monitoring, will be sent to potentially impacted individuals while IMS's investigation is ongoing. We have requested more information from Newport about the nature, extent and impact of the incident, including the details about any impacted individuals (those eligible to participate in the NM-sponsored deferred compensation plans) data. Newport has informed us that IMS and their third-party eDiscovery firm continue to investigate to determine if any personal information, personal data, and/or information of individuals eligible to participate in the NM-sponsored deferred compensation plans (including the number of affected individuals and type of information) may have been impacted.

It is also our understanding that, in response to the security incident, IMS promptly retained a third-party forensic firm, to investigate and assist with IMS's recovery plan. Based on the information received from Newport, Northwestern Mutual has identified 100 New Hampshire residents whose personal information

may have been stored on the relevant IMS systems, and whose personal information was potentially impacted by this incident. The types of information stored on the system may have included the following types of information: We are not aware of any resulting identity theft, fraud, or financial losses to potentially impacted individuals.

Newport anticipates sending these individuals formal, proactive notice that their information may have been compromised February 16, 2024, via U.S. Mail, and is expected to be complete on or about February 19, 2024. A sample of the notification letter is enclosed. As stated in the attached sample notice, Newport is offering to provide individuals of free identity theft and credit monitoring services through Experian. In the event compromise of personal information is confirmed, Newport has agreed to send a supplemental notice letter offering a total of at least of credit monitoring to all impacted individuals. Newport will also maintain call center support to respond to individuals' questions, as will Northwestern Mutual.

As noted above, IMS's investigation of the incident is ongoing. We are proactively monitoring and prepared to respond as new information from Newport or IMS becomes available to us.

Northwestern Mutual takes the protection of personal information of all of its stakeholders seriously and is committed to answering any questions that you may have. Please do not hesitate to contact me at

Respectfully yours,

Stephanie Crites

Enclosures

[Date]

By: [US Mail]

[ParticipantFirst Name] [ParticipantLastName]

[Address1]

[Address2]

[Address3]

[City], [State], [Zip]

Reference: Security Incident & Complimentary Identity Protection Package

Dear Participant:

Newport Group, Inc. serves as a recordkeeper for your non-qualified deferred compensation plan. We are writing to notify you of a potential security incident that occurred. As described below, we do not have evidence that your personal information was impacted by this incident. However, out of an abundance of caution and due to our commitment to the security and privacy of your personal information, we are offering you a complimentary identity protection package through Experian, called IdentityWorks. The relevant details of the incident, and how to enroll with IdentityWorks, are summarized below:

What Happened?	<p>On November 2, 2023 Infosys McCamish Systems ("IMS"), a provider that we use to process transactions for your plan, became aware of a ransomware event. As soon as we learned of the event, we promptly took steps to disconnect and isolate the impacted IMS systems. IMS engaged a leading third-party security expert, Unit 42, part of Palo Alto Networks, to validate the scope of the incident and handle remediation.</p> <p>IMS subsequently successfully restored and rebuilt its environment. In addition, Unit 42 validated that the IMS environment has been hardened and they have observed no indication of ongoing unauthorized access or activity. After confirming it was safe to do so, we reconnected to the IMS system and resumed normal processing for your plan.</p> <p>IMS engaged a leading e-discovery firm, EY, to determine whether data of any of the plans or participants that we service was impacted. In order to service your plan account, we have provided IMS with your name, address, date of birth, and social security number. IMS informed us that it appears that some Newport data was impacted, however:</p> <ul style="list-style-type: none">• IMS does not have evidence that your information was impacted• Their review of accounts and systems to identify potentially impacted information continues• Making that determination will take additional time, and likely months, according to EY
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[Recipient's Name]

[Date]

Page 2 of 2

What We Are Doing?	We will continue to be in close contact with IMS and will provide an update if we have additional relevant information. Although there is no evidence that your personal information has been impacted, out of an abundance of caution Newport is offering you IdentityWorks at no cost to you.
What You Can Do?	<p>IdentityWorks helps detect possible misuse of personal information and provides you with identity protection support focused on immediate identification and resolution of identity theft¹. Please note that this offer is available to you for one year from the date of this letter and requires an action on your part.</p> <p>Additional information, terms of this service, self-help tips, and information about identity protection are located at www.ExperianIDWorks.com/restoration.</p> <p>To start monitoring your personal information please follow the steps below:</p> <ol style="list-style-type: none">1. Ensure that you enroll by: [date]2. Visit the Experian IdentityWorks website to enroll: https://www.experianidworks.com/plus3. Provide your activation code: [code] <p>If you have questions about Experian or IdentityWorks, or if you would like an alternative to enrolling in IdentityWorks online, please contact Experian's customer care team at 1-877-890-9332. As proof of eligibility for this service, you will need to provide the engagement number – [number].</p>
For More Information	If you have any questions about Newport, IMS, or this event, please contact 800-230-3950. We are available to assist you Monday – Friday, 8:00 am - 8:00 pm ET.

We apologize for the inconvenience and any concern this incident may have caused you.

¹ If you are not located in the United States, the terms of this service may be different. You can call the Experian number above for more information.