



**Northwestern Mutual®**

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CONSUMER PROTECTION

February 7, 2024

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

RE: Notification of an Incident

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 Vanguard Group, Inc. ("Vanguard"). Vanguard administers a non-qualified benefit program available to certain members of NM's field sales force.

On Wednesday, January 24, 2024, NM was informed by Vanguard that some data about certain members of NM's Field Sales Force that Vanguard 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, Vanguard has indicated IMS has not yet confirmed whether any personal information (including personal information of members of NM's Field Sales Force) was impacted in the incident. Vanguard has confirmed IMS's investigation is ongoing, and NM is proactively monitoring and prepared to respond as new information from Vanguard or IMS becomes available to us.

While Northwestern Mutual has not received confirmation whether personal information of members of NM's Field Sales Force or others was impacted in the IMS security incident, on January 24, 2024, Vanguard provided Northwestern Mutual a listing of the names and addresses of individuals whose information may have been impacted. Vanguard 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 Vanguard about the nature, extent and impact of the incident, including the details about any impacted NM Field Sales Force data. Vanguard has informed us that IMS and their third-party eDiscovery firm continue to investigate to determine if any personal information, personal data, and/or Field Sales Force information (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 Vanguard, Northwestern Mutual has identified 2 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.

Vanguard anticipates sending these individuals formal, proactive notice that their information may have been compromised February 7, 2024 via U.S. Mail, and is expected to be complete on or about February 9, 2024. A sample of the notification letter is enclosed. As stated in the attached sample notice, Vanguard is offering to provide individuals of free identity theft and credit monitoring services through Experian. In the event compromise of personal information is confirmed, Vanguard has agreed to send a supplemental notice letter offering a total of at least of credit monitoring to all impacted individuals. Vanguard 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 Vanguard 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

*Stephanie Crites*

Stephanie Crites

## Important update regarding your Vanguard nonqualified plan

Dear Participant:

We are writing to notify you of a security incident which impacted a vendor that services your non-qualified deferred compensation plan.

As described below, to date, 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.

In November, we learned that a vendor used by our third-party provider experienced a cybersecurity event. As a result of this event, nonqualified plan services were temporarily disrupted. After learning of the event, Vanguard quickly engaged as the vendor took steps to contain the issue, securely rebuild impacted systems, and safely restore services. This incident did not impact Vanguard's network or systems, and it did not impact qualified defined contribution plans (like 401(k)s) or brokerage accounts administered by Vanguard.

After learning of the issue, the vendor commenced a forensic investigation with the assistance of cybersecurity firms to determine the impact to data it stores on behalf of its clients. The vendor stores certain information used to support servicing of nonqualified plans, which may include your

We were recently informed that, based on the vendor's investigation, certain data may have been impacted by this incident, however:

- To date, Vanguard has not received evidence that Vanguard plan or participants' data was specifically affected in connection with this event.
- The vendor's review into the nature of the impacted data is ongoing and will take additional time (potentially months). We will continue to engage and push for timely updates on the status of the investigation.

We take the security of your information very seriously and, out of an abundance of caution, we wanted to notify you about this issue and **provide you with identity protection services at no cost** to you.

### How to Enroll in IdentityWorks:

IdentityWorks helps detect possible misuse of personal information and provides you with identity protection support focused on immediate identification and resolution of identity theft. This offer is available to you for one year from the date of this letter and requires you to enrollment following the steps below:

1. Visit the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/plus>
2. Provide your **activation code**: [code]
3. Ensure that you **enroll by**: [date]

Additional information, terms of this service, self-help tips, and information about identity protection are available at [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration).

If you have questions about IdentityWorks or would like an alternative to the online enrollment process for Experian IdentityWorks, please contact Experian's customer care team at . As proof of eligibility for this service, you will need to provide the engagement number – [number].

**Additional Steps to Protect Your Online Security:**

Additionally, we encourage you to take advantage of account security measures available to you through your Vanguard account, and to proactively monitor your online security.

- Use strong passwords and change them regularly.
- Do not recycle or reuse usernames and passwords across multiple accounts.
- Take advantage of multi-factor authentication whenever available.
- Beware of phishing attacks – these are on the rise. Vanguard will never send you an email asking you for personal information.
- Visit [www.vanguard.com/security-center](http://www.vanguard.com/security-center) to learn more about best practices and the steps Vanguard takes to protect you.

If you have any questions about this incident or your nonqualified plan, please contact 800-523-1188. We are available to assist you on business days from 8:30 am - 9:30 pm EST.

We hope this information is useful to you, and we apologize for the inconvenience and any concern this incident may have caused you.