ROWAN COMPANIES PLC

2800 POST OAK BOULEVARD, SUITE 5450 HOUSTON, TEXAS 77056

May 30, 2014

Office of the Attorney General Consumer Protection and Antitrust Bureau 33 Capitol Street Concord, NH 03301

Re:

Notification of Information Security Breach

Dear Sir or Madam:

I write to inform you of a security incident at Rowan Companies, Inc. ("Rowan") which may have involved the personal information of seven (7) New Hampshire residents. Rowan is a leading provider of contract off-shore drilling services in the ultra-deep water and shallow water markets, with operations in the United States and around the world. Rowan's principal place of business in the United States is located at 2800 Post Oak Blvd., Suite 5450, Houston, Texas 77056.

On May 13, 2014, Rowan's Information Security team detected an unauthorized intrusion into the Rowan computer systems. Based on current information, Rowan believes that the intruder obtained login/password credentials to gain access to Rowan's network environment. Although the investigation is ongoing, there are indications that the intruder may have accessed the personal data of employees and non-employee contractors or vendors that was stored on the Rowan system or in personal accounts that were accessed by an individual while using a Rowan computer or system. Although a precise link has not been established, Rowan has received reports that several employees experienced unauthorized charges made to their personal credit cards, PayPal accounts or personal bank accounts.

Rowan takes seriously privacy and security matters and took immediate steps to respond to and mitigate the incident. We reported the incident to law enforcement and are working with leading forensic security experts to conduct an internal investigation and to enhance and strengthen our network security. Rowan notified all employees worldwide of the security incident on May 27, 2014 via email. The same notice will be sent in hardcopy to all employees and to non-employees for whom Rowan has a mailing address between May 30 and June 2. Rowan notified the three national credit reporting agencies on May 30. Additionally, Rowan is offering a one (1) year subscription of credit and identity theft monitoring to those employees for whom there is evidence of unauthorized account access by the intruder. We have included a sample employee notice for your review.

If you have any questions regarding this incident, please contact me at (713) 968-6848 or by email at meltre@rowancompanies.com.

Sincerely,

Melanie Trent

SVP, CAO & Company Secretary

Dear Rowan Colleague,

On May 13, 2014, our Information Security team detected an unauthorized intrusion into Rowan's computer systems. Based on current information, we believe that the intruder obtained login/password credentials to gain access to our network environment. In some cases, the intruder appears to have accessed employee personal data that was stored on the Rowan system or in a personal account that the employee accessed while using a Rowan computer or system. We have already alerted all individuals whose computers or email accounts appear to have been accessed, and a handful of employees have reported unauthorized charges made to their personal credit card, Paypal accounts or bank accounts.

We take this matter very seriously and are addressing it from multiple angles. We are working with leading cybersecurity experts and consultants who are conducting forensic analyses and helping to lock down our systems. We have already implemented a company-wide password reset, shutoff certain access points to our network, implemented additional controls and monitoring, and are in the process of bringing still further security enhancements online. We are also working closely with United States federal law enforcement agents in an effort to identify and bring the criminal perpetrator to justice.

Our investigation is continuing at a fast pace. At this stage, we do not want to rule out unauthorized access to any category of personal data that may reside in our systems, such as name, social security or other identification numbers, banking information, benefits information, or other information maintained in Rowan email accounts or software applications. We ask for your help to protect and maintain security. Accordingly, out of an abundance of caution, please follow these recommendations:

- 1. To protect against the possibility of identity theft or fraud, we urge you to remain vigilant and regularly review your bank and credit card statements and credit reports for any unauthorized withdrawals, charges or other activity. You may want to request that your bank monitor for possible fraudulent transactions or unusual activity on your account(s).
- 2. If you suspect that you are a victim of identity theft or fraud, immediately contact your local law enforcement office, your State Attorney General's office or the Federal Trade Commission.
- 3. Be alert to "phishing" by someone who acts like a colleague or friend and requests sensitive information over email, such as passwords, social security numbers, or bank account numbers. Rowan will NOT ask for this type of information over email.
- 4. Do NOT open or download suspicious or unknown email links or attachments.
- 5. Be proactive and change both your Rowan and your personal passwords, including any email, financial, banking, and social network accounts. Never use the same password for more than one account.

6. Follow Rowan's password policy, which requires that passwords be at least eight (8) characters and include at least one of each of the following: (a) upper case alpha letter; (b) lower case alpha letter; and (c) a numeral (1-9). Additionally, if possible, the password should also contain a special character (!@#\$%^&*). When you change your password, it is important that you change the whole password, not just the last digit or letter.

Finally, we want to give you some additional resources and information.

- Certain countries have compiled resources for victims of data breach and identity theft, which we have attached for you review. Your home country may have additional resources available. If you are a victim of identity theft, please contact your local law enforcement. Let us know if you have any questions.
- If you receive any suspicious emails or if you are aware of any issue that could be related to a security incident, please immediately forward to us at: infosec@rowancompanies.com.
- If you have any other questions or concerns please contact securityquestions@rowancompanies.com. In addition, you can always contact the IT Service Desk at 713-960-7654 or help@rowancompanies.com.

Your privacy and security are of paramount importance to all of us, and we deeply regret any inconvenience or concern this incident may cause you. If you have any questions, please contact us at the email or numbers listed above.

Sincerely,

Lisa Gauthier Vice President, Chief Information Officer

Melanie Trent Senior Vice President, Chief Administrative Office

Rowan Companies plc 2800 Post Oak Blvd., Suite 5450 Houston, Texas, 77056

IDENTITY THEFT RESOURCES GUIDE – UNITED STATES

For Residents of Iowa, Maryland and North Carolina: For information about fraud alerts, security freezes, and steps you can take to protect against identity theft, contact the U.S. Federal Trade Commission (see contact information below), or as applicable:

Iowa's Office of the Attorney General: 1305 E. Walnut Street, Des Moines, IA 50319; Tel: (515) 281-5164; or Visit www.iowa.gov/government/ag. State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

Maryland's Office of the Attorney General: 200 Saint Paul Place, Baltimore, MD 21202; Tel: (410) 576-6300; or Visit: www.oag.state.md.us

North Carolina's Attorney General's Office: 9001 Mail Service Center, Raleigh, NC 27699-9001; Tel: (919) 716-6400; Fax: (919) 716-6750; or Visit: http://www.ncdoj.com

U.S. Federal Trade Commission (FTC): The FTC has helpful information about how to avoid identity theft and other steps that consumers can take to protect themselves.

Write to: Consumer Response Center, 600 Pennsylvania Ave., NW, H-130, Washington, D.C. 20580 Call Toll-Free: 1-877-IDTHEFT (438-4338); or Visit: http://www.ftc.gov/idtheft

Free Annual Credit Report: You may obtain a free copy of your credit report once every 12 months and may purchase additional copies of your credit report. Call Toll-Free: 1-877-322-8228; or Visit: https://www.annualcreditreport.com; or Contact any one or more of the national consumer reporting agencies:

 Equifax:
 P.O. Box 740241, Atlanta, GA 30374-0241 (800) 685-1111
 www.equifax.com

 Experian:
 P.O. Box 2002, Allen, TX 75013
 (888) 397-3742
 www.experian.com

 TransUnion:
 P. O. Box 1000, Chester, PA 19022
 (800) 888-4213
 www.transunion.com

"Fraud Alerts" and "Security Freezes"

<u>Fraud Alert</u> - You may have the right to place a fraud alert in your file to alert potential creditors that you may be a victim of identity theft. Creditors must then follow certain procedures to protect you; therefore, a fraud alert may delay your ability to obtain credit. An "initial fraud alert" stays in your file for at least 90 days. An "extended fraud alert" stays in your file for 7 years, and will require an *identity theft report* (usually, a filed police report). You may place a fraud alert by calling any one of the three national consumer reporting agencies:

Equifax: 1-800-525-6285 **Experian:** 1-888-397-3742 **TransUnion:** 1-800-680-7289

<u>Security Freeze</u> – Some US state law, including in Massachusetts, provide the right to place a security freeze on your credit file, which prevents credit, loans and services from being approved in your name without your consent. Using a freeze may interfere with or delay your ability to obtain credit.

To place a freeze, send a request by mail to each consumer reporting agency (addresses below) with the following (if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) Full name, with middle initial and any suffixes; (2) Social Security Number; (3) Date of Birth; (4) proof of current address (such as a utility bill or telephone bill) and list of any previous addresses for the past five years; (5) copy of a government issued identity card, and (6) copy of police report, investigative report or complaint to law enforcement regarding identity theft. The consumer reporting agency may charge a fee up to \$5.00 to place, lift, and/or remove a freeze, unless you are a victim of identity theft or the spouse of a victim, and you have submitted a valid police report relating to the identity theft incident to the consumer reporting agency.

The consumer reporting agencies have three business days after receiving your letter to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five business days and provide you with a unique PIN or password that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, you must call or send a written request to the consumer reporting agencies by mail and include proper identification (name, address, and SSN) and the PIN number or password provided to you when you placed the security freeze as well as the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The consumer reporting agencies have three business days after receiving your request to lift the security freeze for those identified entities or specified period of time.

To remove the security freeze, you must send a written request to each of the three credit bureaus by mail and include proper identification (name, address, and SSN) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have three business days after receiving your request to remove the freeze.

Equifax Security Freeze: P.O. Box 105788, Atlanta, Georgia 30348

Experian Security Freeze: P.O. Box 9554, Allen, TX 75013

TransUnion (Fraud Victim Assistance Division): P.O. Box 6790, Fullerton, CA 92834-6790