

**AURORA**  
AURORA NATIONAL LIFE ASSURANCE COMPANY

RECEIVED

JUL 26 2023

CONSUMER PROTECTION

July 21, 2023

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

To Whom it May Concern,

On June 20, 2023, Aurora National Life Assurance Company ("Aurora"), was informed by its third-party administrator, Alliance-One Services, Inc. ("Alliance-One"), that one of Alliance-One's third-party service providers, Pension Benefit Information LLC ("PBI"), experienced an incident involving a vulnerability in its MOVEit Transfer software that affected the security of Aurora policyholder data (the "PBI Incident"). PBI provides Alliance-One with death match services for the Aurora business lines that Alliance-One administers.

On June 20, 2023, Alliance-One notified Aurora that specific records associated with a subset of Aurora's policyholders might have been impacted in the PBI Incident. On June 28, 2023, Aurora determined that the affected data included

. At this time, it currently believes that approximately 127 consumers residing in New Hampshire were impacted.

PBI sent formal notices via U.S. mail to affected individuals on July 21, 2023. Please find attached Aurora's sample consumer notification letter, which contains instructions on how the affected individuals can sign up for credit monitoring services.

Should you have any questions, please contact me by email at [rgooderl@rgare.com](mailto:rgooderl@rgare.com) or by phone at

Respectfully yours,

Robert Gooderl  
Vice President of Administration Oversight

# AURORA

AURORA NATIONAL LIFE ASSURANCE COMPANY  
16600 Swingley Ridge Road, Chesterfield, MO 63017

July 21, 2023

## Notice of Data Breach

Dear John Doe,

We are writing to inform you of a third-party security incident involving your personal information. On May 31, 2023, Progress Software announced a previously unknown vulnerability affecting its MOVEit Transfer application. A vendor of our third-party administrator, Alliance-One Inc. ("Alliance"), utilized this application for managed file transfers and was affected by this vulnerability. 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 June 2, 2023, Pension Benefits Information, LLC ("PBI"), one of Alliance-One's third-party service providers that utilizes MOVEit in the regular course of its business operations to securely transfer files, including with Alliance-One, confirmed that the vulnerability in their MOVEit software had been exploited by an unauthorized third party. PBI promptly launched an investigation into the nature and scope of the exploit's impact on its systems. PBI discovered that between May 29, 2023 and May 30, 2023, an unauthorized third party downloaded certain data from its systems.

**What Information Was Involved?** PBI has informed us that the Aurora policyholder information accessed in this PBI incident included

. We are not aware of any use or distribution of the accessed information at this time.

**What Are We Doing?** Upon learning of the incident on June 3, 2023, Alliance-One immediately stopped all file transfers to PBI. PBI has confirmed the incident is contained, and that it has implemented multiple additional security measures to harden its information systems and increase its ability to deter threats. PBI has notified and is cooperating with federal law enforcement authorities. This incident did not affect any computer system at Aurora or Alliance-One.

Aurora has retained NortonLifeLock to provide complimentary LifeLock Defender™ Choice identity theft protection. This service helps detect misuse of personal information. To activate your membership online and get protection at no cost to you:

1. In your web browser, go directly to [Norton.com/Offers](https://www.norton.com/offers)
2. Below the THREE protection plan boxes, you may enter the Promo Code: \_\_\_\_\_ and click the "APPLY" button.
3. Your complimentary offer is presented. Click the Orange "START MEMBERSHIP" button.
4. A Popup will appear to enter your Member ID \_\_\_\_\_ and click "APPLY"

5. Once enrollment is completed, you will receive a confirmation email (be sure to follow ALL directions in this email).

Alternatively, to activate your membership over the phone, please call:

**You will have until \_\_\_\_\_, \_\_\_\_\_ to enroll in this service.**

**What You Can Do.** We encourage you to remain vigilant for incidents of fraud, identity theft, and errors by regularly reviewing your account statements for any unauthorized activity and monitoring free credit reports over the next twelve to twenty-four months. 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 and additional information regarding your complimentary Norton LifeLock Defender Choice identity theft protection services.

**For More Information.** Should you have any questions regarding this incident please contact NortonLifeLock Inc. at \_\_\_\_\_ . We regret that this incident occurred and apologize that it may have compromised your personal account and information.

Sincerely,

Robert Gooderl  
VP Administration Oversight

## STEPS YOU CAN TAKE TO PROTECT YOUR INFORMATION

### **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.

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

Equifax 1-800-525-6285 P.O. Box 740241 Atlanta, GA 30374-0241 <a href="https://www.equifax.com/personal">https://www.equifax.com/personal</a>	Experian 1-888-397-3742 P.O. Box 2104 Allen, TX 75013-0949 <a href="https://www.experian.com">https://www.experian.com</a>	TransUnion Corp 1-800-888-4213 P.O. Box 2000 Chester, PA 19016 <a href="https://www.transunion.com">https://www.transunion.com</a>
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### **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-fera.pdf](http://www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fera.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 291 Rhode Island residents that may be impacted by this event.

#### **Additional Information Regarding Your Complimentary LifeLock Defender Services**

Once you have completed the LifeLock enrollment process, the service will be in effect. Your LifeLock Defender™ Choice membership includes:

- Primary Identity Alert System†
- 24/7 Live Member Support
- Dark Web Monitoring\*\*
- Norton™ Security Deluxe2 (90 Day Free Subscription)
- Stolen Funds Reimbursement up to \$25,000 †††
- Personal Expense Compensation up to \$25,000 †††
- Coverage for Lawyers and Experts up to \$1 million †††
- U.S.-Based Identity Restoration Team
- One-Bureau Credit Monitoring1\*\*
- Annual One-Bureau Credit Report & Credit Score1\*\*

The credit score provided is a VantageScore 3.0 credit score based on Equifax data. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your creditworthiness.

1 If your plan includes credit reports, scores, and/or credit monitoring features ("Credit Features"), two requirements must be met to receive said features: (i) your identity must be successfully verified with Equifax, and (ii) Equifax must be able to locate your credit file and it must contain sufficient credit history information. IF EITHER OF THE FOREGOING REQUIREMENTS ARE NOT MET YOU WILL NOT RECEIVE CREDIT FEATURES FROM ANY BUREAU. If your plan also includes Credit Features from Experian and/or TransUnion, the above verification process must also be successfully completed with Experian and/or TransUnion, as applicable. If verification is successfully completed with Equifax, but not with Experian and/or TransUnion, as applicable, you will not receive Credit Features from such bureau(s) until the verification process is successfully completed and until then you will only receive Credit Features from Equifax. Any credit monitoring from Experian and TransUnion will take several days to begin after your successful plan enrollment. No one can prevent all identity theft or cybercrime. † LifeLock does not monitor all transactions at all businesses.

2 Norton Security Online provides protection against viruses, spyware, malware, and other online threats for up to 5 PCs, Macs, Android devices. Norton account features not supported in this edition of Norton Security Online. As a result, some mobile features for Android are not available such as anti-theft and mobile contacts backup. iOS is not supported.

\*\* These features are not enabled upon enrollment. Member must take action to get their protection.

††† Reimbursement and Expense Compensation, each with limits of up to \$25,000 for Defender Choice. And up to \$1 million for coverage for lawyers and experts if needed, for all plans. Benefits provided by Master Policy issued by United Specialty Insurance Company (State National Insurance Company, Inc. for NY State members). Policy terms, conditions and exclusions at: [LifeLock.com/legal](http://LifeLock.com/legal).