

July 21, 2021

WRITER'S DIRECT NUMBER: (317) 236-2337  
DIRECT FAX: (317) 592-4745  
EMAIL: [NICHOLAS.MERKER@icemiller.com](mailto:NICHOLAS.MERKER@icemiller.com)

**CONFIDENTIAL**

**Via Electronic Mail**

Office of the New Hampshire Attorney General  
[DOJ-CPB@DOJ.NH.gov](mailto:DOJ-CPB@DOJ.NH.gov)  
33 Capitol Street  
Concord, NH 03301

***RE: Written Notification of an Information Security Incident***

Dear Attorney General:

On behalf of my client, CNO Financial Group, Inc., and its subsidiaries which include Bankers Life, Colonial Penn Life Insurance Company, and Washington National Insurance Company (collectively "CNO"), I am hereby submitting written notification of an Information Security Incident, in compliance with N.H. Rev. Stat. §§ 359-C:20(I)(b).

On May 25, 2021, Guidehouse, a vendor utilized by CNO for data analysis purposes, informed CNO that an unencrypted file shared between the parties through the Accellion File Transfer Appliance ("FTA") was accessed by an unauthorized third party. It is our understanding that the attack occurred between December 2020 and January 2021, and was part of a cyber attack campaign targeting Accellion FTA that was used by our vendor, Guidehouse, and many other companies. (For information that Accellion has provided publicly about the compromise of its product, see <https://www.accellion.com/company/security-updates/accellion-responds-to-recent-fta-security-incident/> and <https://www.accellion.com/company/security-updates/mandiant-issues-final-report-regarding-accellion-fta-attack/>). **To be clear, no CNO systems or networks were compromised as a result of this security incident.**

Upon learning of the incident, Guidehouse launched an investigation and ceased using the Accellion FTA. Guidehouse cooperated with federal law enforcement and engaged leading cyber security experts in connection with investigating and responding to the incident. Based on the nature of the incident, and the delay in Guidehouse notifying CNO, it has taken time to accurately determine what data was impacted. Through our investigation, we have determined that the third party may have accessed the name, date of birth, policy number, social security number, and address of individual customers.

Attorney General  
Office of the New Hampshire Attorney General  
July 21, 2021  
Page 2

Although we are not aware of any misuse of compromised personal information, on our behalf, Guidehouse is notifying three (3) New Hampshire residents of this incident, beginning on July 21, 2021. We will provide these individuals with an offer for complimentary two year credit monitoring service provided by Experian. An individual can enroll in Experian's IdentityWorks credit monitoring product either online at <https://www.experianidworks.com/credit> or by calling (877) 890-9332.

Attached is a sample of the letter that we are providing to New Hampshire residents.

If you require further information about this matter, please contact me by telephone at (317) 236-2337 or via email at [nicholas.merker@icemiller.com](mailto:nicholas.merker@icemiller.com).

Sincerely,

ICE MILLER LLP

A handwritten signature in black ink, appearing to read 'N. Merker', with a stylized, cursive flourish at the end.

Nicholas Merker, CISSP, CIPT  
Partner, Ice Miller LLP

Attachments: Copy of Notice



Return Mail Processing  
PO Box 999  
Suwanee, GA 30024

41562\*\*\*\*\*SNGLP

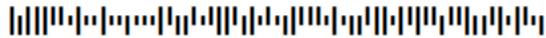
SAMPLE A. SAMPLE - L01

APT ABC



123 ANY ST

ANYTOWN, US 12345-6789



July 21, 2021

### NOTICE OF DATA BREACH

We are contacting you regarding a security incident at Guidehouse which may have involved some of your personal information. Guidehouse provides services to Bankers Life, Colonial Penn, and Washington National Insurance Company, which are part of CNO Financial Group, Inc. (“CNO”). The personal information at issue in this security incident involves your insurance coverage with one or more of these brands.

#### WHAT HAPPENED.

On March 23, 2021, Guidehouse learned that a file-sharing vendor utilized by Guidehouse became victim of a cyber attack on January 20, 2021 that compromised a file shared between Guidehouse and CNO through this vendor. This security incident did not involve any compromise of CNO’s systems or network.

#### WHAT INFORMATION WAS INVOLVED.

The personal information involved in this incident includes your name, date of birth, policy number, social security number, and address.

#### WHAT WE ARE DOING.

Upon learning of the incident, we immediately launched an investigation, and also ceased using the third-party service that had been compromised. We cooperated with federal law enforcement and engaged leading cyber security experts in connection with investigating and responding to the incident.

#### WHAT YOU CAN DO.

We are not aware of any misuse of your personal information. Below, please find information about steps that an individual may take to protect against potential misuse of their personal information.

As a precaution, we have arranged for you, at your option, to enroll in a complimentary, two-year credit monitoring service. We have engaged Experian to provide you with its IdentityWorks credit monitoring product. This product provides you with superior identity detection and resolution of identity theft. You have until October 31, 2021 to activate the free credit monitoring service by using the following activation code: [REDACTED] This code is unique for your use and should not be shared. To enroll, please go to <https://www.experianidworks.com/credit> or call [REDACTED]

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian’s customer care team at (833) 671-0408 by October 31, 2021. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

Please remain vigilant for incidents of fraud and identity theft, including by regularly reviewing your account statements and monitoring free credit reports. If you discover any suspicious or unusual activity on your accounts or suspect identity theft or fraud, be sure to report it immediately to your financial institutions.

In addition, you may contact the Federal Trade Commission (“FTC”) or law enforcement, including your state Attorney General, to report incidents of identity theft or to learn about steps you can take to protect yourself from identity theft. To learn more, you can go to the FTC’s Web site, at [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft), or call the FTC, at (877) IDTHEFT (438-4338) or write to Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

You may also periodically obtain credit reports from each nationwide credit reporting agency. If you discover information on your credit report arising from a fraudulent transaction, you should request that the credit reporting agency delete that information from your credit report file. In addition, under the federal Fair Credit Reporting Act (“FCRA”), you are entitled to one free copy of your credit report every 12 months from each of the three nationwide credit reporting agencies. You may obtain a free copy of your credit report by going to [www.AnnualCreditReport.com](http://www.AnnualCreditReport.com) or by calling (877) 322-8228. You may contact the nationwide credit reporting agencies at:

Equifax (800) 685-1111 P.O. Box 740241 Atlanta, GA 30374-0241 <a href="http://www.Equifax.com/personal/credit-report-services">www.Equifax.com/personal/credit-report-services</a>	Experian (888) 397-3742 P.O. Box 9701 Allen, TX 75013 <a href="http://www.Experian.com/help">www.Experian.com/help</a>	TransUnion (888) 909-8872 Fraud Victim Assistance Division P.O. Box 2000 Chester, PA 19022 <a href="http://www.TransUnion.com/credit-help">www.TransUnion.com/credit-help</a>
--	--	--

You also have other rights under the FCRA. For further information about your rights under the FCRA, please visit: [http://files.consumerfinance.gov/f/201410\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://files.consumerfinance.gov/f/201410_cfpb_summary_your-rights-under-fcra.pdf).

In addition, you may obtain additional information from the FTC and the credit reporting agencies about fraud alerts and security freezes. You can add a fraud alert to your credit report file to help protect your credit information. A fraud alert can make it more difficult for someone to get credit in your name because it tells creditors to follow certain procedures to protect you, but it also may delay your ability to obtain credit. You may place a fraud alert in your file by calling just one of the three nationwide credit reporting agencies listed above. As soon as that agency processes your fraud alert, it will notify the other two agencies, which then must also place fraud alerts in your file.

In addition, you can contact the nationwide credit reporting agencies at the phone numbers listed above to place a security freeze to restrict access to your credit report. There is no charge to place, lift or remove a security freeze. You will need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your request, each credit reporting agency will send you a confirmation letter containing a unique PIN or password that you will need in order to lift or remove the freeze. You should keep the PIN or password in a safe place.

#### **FOR MORE INFORMATION.**

Please know that we regret any inconvenience or concern this incident may cause you. Please do not hesitate to contact us at (833) 671-0408 if you have any questions or concerns. Be prepared to provide your engagement number [REDACTED]

*IF YOU ARE A DISTRICT OF COLUMBIA RESIDENT:* You may obtain information about avoiding identity theft from the FTC or the District of Columbia Attorney General's Office. These offices can be reached at:

Federal Trade Commission Consumer Response Center 600 Pennsylvania Avenue, NW Washington, DC 20580 (877) IDTHEFT (438-4338) <a href="http://www.ftc.gov/idtheft/">http://www.ftc.gov/idtheft/</a>	Office of the Attorney General 441 4th Street, NW Suite 1100 South Washington, DC 20001 (202) 727-3400 <a href="https://oag.dc.gov/">https://oag.dc.gov/</a>
--	---

*IF YOU ARE A MARYLAND RESIDENT:* You may obtain information about avoiding identity theft from the FTC or the Maryland Attorney General's Office. These offices can be reached at:

Federal Trade Commission Consumer Response Center 600 Pennsylvania Avenue, NW Washington, DC 20580 (877) IDTHEFT (438-4338) <a href="http://www.ftc.gov/idtheft/">http://www.ftc.gov/idtheft/</a>	Office of the Attorney General Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202 (888) 743-0023 <a href="http://www.oag.state.md.us">www.oag.state.md.us</a>
--	---

*IF YOU ARE A NEW YORK RESIDENT:* You may obtain information about security breach response and identity theft prevention and protection from the FTC or from the following New York state agencies:

Federal Trade Commission Consumer Response Center 600 Pennsylvania Avenue, NW Washington, DC 20580 (877) IDTHEFT (438-4338) <a href="http://www.consumer.gov/idtheft">www.consumer.gov/idtheft</a>	New York Attorney General Consumer Frauds & Protection Bureau 120 Broadway, 3rd Floor New York, NY 10271 (800) 771-7755 <a href="http://www.ag.ny.gov">www.ag.ny.gov</a>	New York Department of State Division of Consumer Protection 99 Washington Avenue Suite 650 Albany, New York 12231 (800) 697-1220 <a href="http://www.dos.ny.gov">www.dos.ny.gov</a>
---	--	--

*IF YOU ARE A NORTH CAROLINA RESIDENT:* You may obtain information about preventing identity theft from the FTC or the North Carolina Attorney General's Office. These offices can be reached at:

Federal Trade Commission Consumer Response Center 600 Pennsylvania Avenue, NW Washington, DC 20580 (877) IDTHEFT (438-4338) <a href="http://www.consumer.gov/idtheft">www.consumer.gov/idtheft</a>	North Carolina Department of Justice Attorney General Josh Stein 9001 Mail Service Center Raleigh, NC 27699-9001 (877) 566-7226 <a href="http://www.ncdoj.com">http://www.ncdoj.com</a>
---	--

