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APR 01 2024

CONSUMER PROTECTION

BY U.S. MAIL

March 29, 2024

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

To Whom It May Concern:

On behalf of The Global Atlantic Financial Group LLC (including its wholly owned subsidiary Accordia Life and Annuity Company, collectively "Global Atlantic"), and pursuant to N.H. Rev. Stat. Ann. § 359-C:20(I)(B), this letter provides notice of a cybersecurity incident potentially involving New Hampshire residents.

On November 3, 2023, Global Atlantic was informed by its third-party administrator, Infosys McCamish Systems, LLC ("McCamish"), that McCamish had experienced an incident that affected certain McCamish systems used by Global Atlantic (the "McCamish Incident"). Global Atlantic and McCamish had several calls in November and December regarding the status of McCamish's recovery, and to confirm that McCamish's systems were securely restored.

In January 2024, McCamish informed Global Atlantic for the first time that its e-discovery process had identified Global Atlantic's name among certain data that McCamish had identified as potentially impacted. McCamish's most recent estimate for the completion of its e-discovery process is by May 2024.

McCamish is a third-party administrator that provides Global Atlantic with back-office support technology and services for certain of Global Atlantic's insurance policies issued by its subsidiary, Accordia Life and Annuity Company. Global Atlantic provides McCamish with the Global Atlantic policyholder data needed to perform these services.

As explained to Global Atlantic, on November 2, 2023, McCamish discovered that it had been a victim of a cybersecurity incident during which an unauthorized party gained access to its systems. McCamish immediately disabled systems and retained a third-party forensics firm to investigate and assist with its recovery plan. McCamish has restored services with additional security controls and has found no evidence of continued threat actor access in its environment.

McCamish also retained a third-party e-discovery firm to investigate potential impact to consumer data, and discovered that certain of its clients' data, including that of Global Atlantic,

may have been accessed or acquired. We will not have confirmation of whether, and if so, what, personal information was impacted until the e-discovery process is completed.

Global Atlantic determined that it would notify potentially impacted individuals of the possibility that their data had been impacted out of an abundance of caution rather than wait for McCamish's forensic review to be complete. Global Atlantic believes that there is 1 potentially impacted individual who resides in New Hampshire. Global Atlantic anticipates sending these individuals notice the week of April 1, 2024 via U.S. mail. A sample of the notification letter is enclosed. Potentially impacted individuals are being offered 24 months of free credit monitoring, fraud consultation, and identity theft restoration services through Kroll. Kroll also has established a call center to respond to individuals' questions. Depending on the individual, the types of Global Atlantic information McCamish would have on its systems included the following:

- Global Atlantic is not aware of any resulting identity theft, fraud, or financial losses to individuals.

Notice was not delayed as a result of a law enforcement investigation.

Global Atlantic is continuing to work with McCamish to confirm the scope of impact in order to comply with any required notification obligations, and will send follow-up notices to impacted individuals once more information is known. Global Atlantic understands that it is one of many McCamish customers impacted by the incident, and does not appear to have been targeted. For the avoidance of doubt, Global Atlantic has no reason to believe that the McCamish Incident impacted its own systems or network environment.

Global Atlantic will provide updates regarding any additional material information related to the incident once we have the results of McCamish's forensic review. Should you have any questions in the interim, please contact me at the information below.

Regards,

Catherine Valeri
Vice President, Privacy Officer
The Global Atlantic Financial Group LLC
20 Guest Street, 9th Floor
Brighton, MA 02135

Enclosure



<<b2b_text_1 (Date [Format: Month Day, Year])>>

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

Re: Security Incident - Credit Monitoring

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

We are writing to inform you of a cybersecurity incident that occurred at one of our service providers, Infosys McCamish Systems, LLC ("McCamish"). McCamish provides back-office support, technology and services for certain of our life insurance plans issued through our subsidiary, Accordia Life Insurance Company. Global Atlantic shares personal information with McCamish for the purpose of administering these life insurance policies.

While McCamish has not yet confirmed whether or not your information has been impacted, out of an abundance of caution, we are notifying you about this incident and providing tools to help you protect against possible identity theft or fraud. If McCamish's review confirms that your information was impacted, we will send you a further letter with additional details.

Please note that Global Atlantic's environment was *not* compromised as part of this incident. It is still safe to interact with our corporate systems and our website.

What Happened: Around November 2, 2023, McCamish was impacted by a cybersecurity incident in which an unauthorized party gained access to its systems. McCamish immediately disabled systems and retained a third-party forensics firm to investigate and assist with its recovery plan. McCamish has restored services with additional security controls and found no evidence of continued threat actor access in its environment. McCamish informed Global Atlantic that its systems were down due to this incident on November 3, 2023. McCamish also retained a third-party e-discovery firm to investigate potential impact to consumer data, if any. The investigation was not delayed by a law enforcement investigation. In January 2024, McCamish informed Global Atlantic that its data was potentially exposed, although the investigation is ongoing, and McCamish is not yet able to confirm with certainty what data elements were impacted.

What Information Was Involved: The e-discovery firm that was engaged by McCamish is currently conducting a review of data, which will determine whether your personal information was impacted. This review remains ongoing. Given the nature of services that it provides to Global Atlantic as a third-party administrator, McCamish maintains the following data elements about Global Atlantic policyholders that could have been impacted:

. We have not yet confirmed whether any or all of these data elements have been impacted.

What We Are Doing: Although McCamish is not aware of any actual misuse of your information, to help relieve concerns and restore confidence following this incident, McCamish has secured the services of Kroll to provide identity monitoring at no cost to you for 24 months. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6 (activation date)>> to activate your identity monitoring services.

Membership Number: <<Membership Number s_n>>

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

Additional information describing your services is included with this letter.

What You Can Do: We recommend you take the following steps to help protect your personal information:

- Remain vigilant of any unusual activity.
- Promptly review your credit reports and account statements over the next _____ and notify your financial institution of any unauthorized transactions or incidents of suspected identity theft.
- Enroll in the complimentary identity theft protection service offered above.

We also recommend that you review the additional information about ways to protect your identity or any additional rights you have depending on your jurisdiction, both provided in **Attachment A**.

For More Information: Should you have any questions regarding this incident, please contact McCamish's dedicated call center by dialing (866) 992-9742, Monday – Friday between 8am – 5:30pm CT excluding U.S. holidays. Please have your membership number located in your letter ready when calling.

ENC: Attachment A: Additional Information on Protecting Your Information and State Law Information

Attachment A: Additional Information on Protecting Your Information and State Law Information

Monitor Your Accounts

You may obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting one or more of the three national credit reporting agencies listed below.

Equifax®
P.O. Box 740241
Atlanta, GA 30374-0241
1-800-685-1111
www.equifax.com

Experian
P.O. Box 9701
Allen, TX 75013-9701
1-888-397-3742
www.experian.com

TransUnion®
P.O. Box 1000
Chester, PA 19016-1000
1-800-888-4213
www.transunion.com

When you receive your credit reports, review them carefully. Look for accounts or creditor inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number, that is not accurate. If you see anything you do not understand, call the credit reporting agency at the telephone number on the report.

Credit Freeze

You have the right to put a security freeze, also known as a credit freeze, on your credit file, so that no new credit can be opened in your name without the use of a Personal Identification Number (PIN) that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential creditors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to access your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. Should you wish to place a credit freeze, please contact all three major consumer reporting agencies identified above.

You must separately place a credit freeze on your credit file at each credit reporting agency. The following information should be included when requesting a credit freeze: Full name, with middle initial and any suffixes; Social Security number; date of birth (month, day, and year); current address and previous addresses for the past five (5) years; proof of current address, such as a current utility bill or telephone bill; and other personal information as required by the applicable credit reporting agency. If you request a credit freeze online or by phone, the credit reporting agencies have one (1) business day after receiving your request to place a credit freeze on your credit file. If you request a lift of the credit freeze online or by phone, the credit reporting agency must lift the freeze within one (1) hour. If you request a credit freeze or lift of a credit freeze by mail, the credit reporting agency must place or lift the credit freeze no later than three (3) business days after getting your request.

Fraud Alerts

You also have the right to place an initial or extended fraud alert on your credit file at no cost. An initial fraud alert lasts 1-year. 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 you are a victim of identity theft, you are entitled to an extended fraud alert, which lasts 7 years. Should you wish to place a fraud alert, please contact any one of the major consumer reporting agencies listed above. The agency you contact will then contact the other two credit agencies.

Additional Information

You can further educate yourself regarding identity theft and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC. **The Federal Trade Commission:** 600 Pennsylvania Avenue, NW Washington, DC 20580. 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261; and www.ftc.gov/idtheft.

For residents of the District of Columbia, Iowa, Maryland, New York, North Carolina, Oregon and Rhode Island

You may contact your Attorney General for additional information about avoiding identity theft. If you are a Rhode Island resident, you may also file a police report by contacting local or state law enforcement agencies. You may use the following information to contact your attorney general:

Office of the Attorney General Office of Consumer Protection 400 6th Street, NW Washington, DC 20001 (202) 442-9828 www.oag.dc.gov	Office of the Iowa Attorney General Hoover State Office Building 1305 E. Walnut Street Des Moines, IA 50319 (515) 281-5926 / (888) 777-4590 www.iowaattorneygeneral.gov	Maryland Office of the Attorney General Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202 (410) 528-8662 www. marylandattorneygeneral.gov	Oregon Department of Justice 1162 Court Street NE Salem, OR 97301-4096 (877) 877-9392 www.doj.state.or.us
New York Attorney General Consumer Frauds & Protection Bureau 120 Broadway, 3rd Floor New York, NY 10271 (800) 771-7755 www.ag.ny.gov	New York Department of State Division of Consumer Protection 99 Washington Avenue Suite 650 Albany, New York 12231 (800) 697-1220 www.dos.ny.gov	North Carolina Department of Justice 9001 Mail Service Center Raleigh, NC 27699-9001 (919) 716-6000 www.ncdoj.gov	Rhode Island Office of the Attorney General Consumer Protection Division 150 South Main Street Providence, RI 02903 (401) 274-4400 www.riag.ri.gov

For residents of Kentucky: The Kentucky Attorney General – Office of Consumer Protection may be contacted at: 1024 Capital Center Drive, Suite 200, Frankfort, Kentucky 40601; 1-800-804-7556; and <https://www.ag.ky.gov/Resources/Consumer-Resources/Consumers/Pages/Identity-Theft.aspx>.

For residents of Massachusetts: Under Massachusetts law, you have the right to obtain any police report filed in connection to the incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

For residents of New Mexico: You have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Web Watcher

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

\$1 Million Identity Fraud Loss Reimbursement

Reimburses you for out-of-pocket expenses totaling up to \$1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.