



June 4, 2018

**VIA EMAIL (attorneygeneral@doj.nh.gov)**

New Hampshire Attorney General  
33 Capitol St.  
Concord, NH 03301

RE: Breach Incident Notification - Humana, Inc. [HU18001DF]

Dear Attorney General:

The purpose of this letter is to notify your office of a recent incident that has occurred impacting residents of your state.

On January 17, 2018 a Humana contracted employee used an unapproved web application to transmit unsecured Humana Inc. employee data as part of a new internal system integration project.

Upon learning of this incident, Humana took immediate steps to determine the scope of impact. After a detailed analysis, we have concluded that this is an isolated incident that affected a limited number of individuals for a brief period of time. The personal information that was exposed included name, Social Security number and home address.

At this time, we are aware that data was briefly placed on, and then removed from, an unsecure and unencrypted server. We have no evidence that the information has been used inappropriately.

On June 4, 2018, notification letters were sent to one (1) New Hampshire residents who were impacted by this situation. Attached you will find a copy of the letter that includes an offer for free credit monitoring and free identity theft protection.

We deeply regret this incident, but want to assure you that Humana has various safeguards to protect individual information including policies, procedures and technical safeguards. Humana will promptly report to your office and appropriate law enforcement officials any information that is shared with us that indicates this information has been inappropriately used.

If you have any questions about the information received in this letter or require additional information, please do not hesitate to reach out to me.



Privacy Office  
101 E. Main Street  
Louisville, KY 40202  
Humana.com

Sincerely,

A handwritten signature in black ink, appearing to read 'Jon Spalding', is written over a faint, light-colored signature line.

Jon Spalding  
Integration Leader/HR Privacy Official  
Humana Inc.  
502-580-8578  
[jspalding2@Humana.com](mailto:jspalding2@Humana.com)

Enclosures

June 4, 2018

<First Name> <Last Name>  
<Address>  
<City>, <State> <Zip>

## NOTICE OF DATA BREACH

**Equifax Activation Code: < CODE >**

Dear <First Name> <Last Name>;

We are writing to notify you of a recent incident involving your personal information. Protecting every associate's information is a responsibility Humana takes very seriously. For that reason, Humana has teams of individuals that are responsible for establishing, monitoring, and enforcing security policies and procedures that every individual, whether an associate or contractor, must follow.

### **What Happened?**

In spite of these precautions, on January 17, 2018 a Humana contracted employee used an unapproved web application to transmit unsecured data as part of the Workday integration project.

### **What Information Was Involved?**

Upon learning of this incident, Humana took immediate steps to determine the scope of impact. After a detailed analysis, we concluded that this is an isolated incident that impacted a limited number of individuals for a brief period of time. The personal information that was exposed included your name, social security number and home address.

### **What We Are Doing?**

At this time, we do not have any evidence that your information has been used inappropriately. However, we believe it important to inform you of the situation so we can work with you to help you decide the appropriate measures to take to protect yourself from potential identity theft. In addition, the contracted employee no longer works with Humana, and Humana's vendor, TCS, has completed two rounds of retraining for the contracted employees working on the Workday project reinforcing the appropriate policies and procedures they must follow when using personal data. Humana has also deployed an approved solution to the TCS Workday project team for all future development requirements.

## We realize how concerning this is to you

To safeguard your information from potential misuse, we have partnered with Equifax® to provide you their Credit Watch™ Gold with 3-in-1 Monitoring identity theft protection product for one year at no charge to you. A description of this product is provided in the attached material, which also contains instructions about how to enroll (including your personal activation code). If you choose to take advantage of this product, it will provide you with a notification of any changes to your credit information, \$1 million Identity Fraud Expense Coverage and access to your credit report. **We strongly encourage you to enroll for this free service to protect yourself from the potential misuse of your information.**

## What You Can Do

Over the coming weeks, we recommend that you are diligent in reviewing your account statements and credit reports and that you immediately report any unauthorized activity to your financial institutions. We also recommend that you monitor your personal information and visit the Federal Trade Commission's website, [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft), for information about fraud alerts, security freezes and other steps to take to better protect against identity theft.

## For More Information

Safeguarding your personal information is of the utmost importance to us. We are committed to ensuring that an incident like this will never happen again. For more information about the incident and the steps you can take to protect yourself from identity theft, please contact **HR4U at [HR4U@humana.com](mailto:HR4U@humana.com) or 1-888-431-4748.**

Sincerely,



Jon Spalding  
Integration Leader/HR Privacy Official  
Humana Inc.

**Enclosure 1:**

**Federal Trade Commission suggests the following steps if you believe your identity has been stolen**

1. **Place a fraud alert on your credit reports and review your credit reports.** Contact the toll-free fraud number of any of the three consumer reporting companies below to place a fraud alert on your credit report. You only need to contact one of the three companies to place an alert. The company you call is required to contact the other two companies.

<p><b>Equifax</b>          P.O. Box 740241          Atlanta, GA 30374-0241</p> <p><b>1-800-525-6285</b>  <a href="http://www.equifax.com">www.equifax.com</a></p>	<p><b>Experian</b>          P.O. Box 9532          Allen, TX 75013</p> <p><b>1-888-EXPERIAN or 1-888-397-3742</b>  <a href="http://www.experian.com">www.experian.com</a></p>	<p><b>TransUnion</b>          Fraud Victim Assistance Division          P.O. Box 2000          Chester, PA 19016</p> <p><b>1-800-680-7289</b>  <a href="http://www.transunion.com">www.transunion.com</a></p>
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Once you place the fraud alert, you are entitled to order free copies of your credit reports.

2. **Carefully review your credit reports.** Look for inquiries from companies that you haven't contacted, accounts that you did not open, and debts on your accounts that you can't explain. Be aware that some companies may bill under names other than their store names.
3. **Close any accounts that you know, or believe, have been tampered with or opened fraudulently.**
4. **File your concern with the Federal Trade Commission.** This important information helps law enforcement agencies track down identity thieves. You can contact the Federal Trade Commission at 1-877-ID-THEFT, (1-877-438-4338) or by visiting the Federal Trade Commission website at [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft) or write Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

Even if you do not find any signs of fraud on your credit reports, experts in identity theft recommend you check your credit reports every three months for the next year.

**For residents of Iowa:** You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

**Iowa Office of the Attorney General**  
 Consumer Protection Division  
 Hoover State Office Building  
 1305 E. Walnut Street, Des Moines IA 50319  
 1-888-777-4590, [consumer@ag.iowa.gov](mailto:consumer@ag.iowa.gov)

**For residents of Maryland:** You may also obtain information about identity theft prevention from the Maryland Office of the Attorney General:

**Maryland Office of the Attorney General**

Consumer Protection Division  
200 St. Paul Place, Baltimore, MD 21202  
1-888-743-0023, [www.oag.state.md.us](http://www.oag.state.md.us)

**For residents of Massachusetts:** You have the right to obtain a police report if you are a victim of identity theft. You may obtain one or more additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s). The fee for each placement of a freeze, temporary lift of a freeze, or removal of a freeze is \$5.

**Massachusetts Office of the Attorney General**

One Ashburton Place, 18th Floor, Boston, MA 02108  
1-617 727-8400, [www.mass.gov](http://www.mass.gov)

**For residents of North Carolina:** You may also obtain information about identity theft prevention from the North Carolina Attorney General's Office:

**North Carolina Office of the Attorney General**

Consumer Protection Division  
9001 Mail Service Center  
Raleigh, NC 27699-9001  
1-877-5-NO-SCAM, [www.ncdoj.gov](http://www.ncdoj.gov)

**For residents of Oregon:** You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.

**Oregon Office of the Attorney General**

Consumer Protection Division  
200 St. Paul Place, Baltimore, MD 21202  
1-877-877-9392, [www.doj.state.or.us](http://www.doj.state.or.us)

**For residents of Rhode Island:** You may also obtain information about identity theft prevention from the North Carolina Rhode Island Attorney General's Office:

**Rhode Island Office of the Attorney General**

Consumer Protection Unit  
150 South Main Street  
Providence, Rhode Island 02903  
(401) 274-4400, [consumers@riag.ri.gov](mailto:consumers@riag.ri.gov)

We are asking that you remain vigilant. Check for bills that you do not recognize on your credit reports. If you find anything suspicious, call the credit reporting agency at the phone number on the report. Keep a copy of this notice for your records in case of future problems. If you are a **California resident**, we suggest that you visit the web site of the California Office of Privacy Protection at [www.privacy.ca.gov](http://www.privacy.ca.gov) to find more information about your privacy.

**Fraud Alerts:** You can place an initial alert or an extended alert on your credit report to put your creditors on notice that you may be a victim of fraud:. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least 90 days. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by calling the toll-free fraud number of any of the three national credit reporting agencies listed above.

**Credit Freezes (for Non-Massachusetts Residents):** You may have the right to put a credit freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors 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 get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. You may also incur fees to place, lift and/or remove a credit freeze. Credit freeze laws vary from state to state. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting agency.

You can obtain more information about fraud alerts and credit freezes by contacting the FTC or one of the national credit reporting agencies listed above.

**Credit Freezes (for Massachusetts Residents):** Massachusetts law gives you the right to place a credit freeze on your consumer reports. A credit freeze is designed to prevent credit, loans and services from being approved in your name without your consent. Using a credit freeze may delay your ability to obtain credit. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting agency. The credit reporting agency may charge a reasonable fee of up to \$5 to place a freeze or lift or remove a freeze, unless you are a victim of identity theft or the spouse of a victim of identity theft, and have submitted a valid police report relating to the identity theft to the credit reporting agency.

## Discrimination is against the law

Humana Inc. and its subsidiaries comply with applicable federal civil rights laws and do not discriminate on the basis of race, color, national origin, age, disability, or sex. Humana Inc. and its subsidiaries do not exclude people or treat them differently because of race, color, national origin, age, disability, or sex.

Humana Inc. and its subsidiaries provide: (1) free auxiliary aids and services, such as qualified sign language interpreters, video remote interpretation, and written information in other formats to people with disabilities when such auxiliary aids and services are necessary to ensure an equal opportunity to participate; and, (2) free language services to people whose primary language is not English when those services are necessary to provide meaningful access, such as translated documents or oral interpretation.

If you need these services, call **1-877-320-1235** or if you use a **TTY**, call **711**.

If you believe that Humana Inc. and its subsidiaries have failed to provide these services or discriminated in another way on the basis of race, color, national origin, age, disability, or sex, you can file a grievance with Discrimination Grievances, P.O. Box 14618, Lexington, KY 40512-4618.

If you need help filing a grievance, call **1-877-320-1235** or if you use a **TTY**, call **711**.

You can also file a civil rights complaint with the **U.S. Department of Health and Human Services**, Office for Civil Rights electronically through the Office for Civil Rights Complaint Portal, available at <https://ocrportal.hhs.gov/ocr/portal/lobby.jsf>, or by mail or phone at **U.S. Department of Health and Human Services**, 200 Independence Avenue, SW, Room 509F, HHH Building, Washington, DC 20201, **1-800-368-1019, 800-537-7697 (TDD)**.

Complaint forms are available at <https://www.hhs.gov/ocr/office/file/index.html>

## Multi-Language Interpreter Services

**ATTENTION:** If you do not speak English, language assistance services, free of charge, are available to you. Call **1-877-320-1235 (TTY: 711)**.... **ATENCIÓN:** si habla español, tiene a su disposición servicios gratuitos de asistencia lingüística. Llame al **1-877-320-1235 (TTY: 711)**.... **注意:** 如果您使用繁體中文, 您可以免費獲得語言 援助服務。請致電 **1-877-320-1235 (TTY: 711)**。... **CHÚ Y:** Nếu bạn nói Tiếng Việt, có các dịch vụ hỗ trợ ngôn ngữ miễn phí dành cho bạn. Gọi số **1-877-320-1235 (TTY: 711)**.... **주의:** 한국어를 사용하시는 경우, 언어 지원 서비스를 무료로 이용하실 수 있습니다. **1-877-320-1235 (TTY: 711)**번으로 전화해 주십시오.... **PAUNAWA:** Kung nagsasalita ka ng Tagalog, maaari kang gumamit ng mga serbisyo ng tulong sa wika nang walang bayad.

**Tumawag sa 1-877-320-1235 (TTY: 711)**.... **Если вы говорите на русском языке, то вам доступны бесплатные услуги перевода. Звоните 1-877-320-1235 (телефайп: 711)**.... **ATANSYON:** Si w pale Kreyòl Ayisyen, gen sèvis èd pou lang ki disponib gratis pou ou. Rele **1-877-320-1235 (TTY: 711)**.... **ATTENTION :** Si vous parlez français, des services d'aide linguistique vous sont proposés gratuitement. Appelez le

**1-877-320-1235 (ATS: 711)**.... **UWAGA:** Jezeli mówisz po polsku, możesz skorzystać z bezpłatnej pomocy językowej. Zadzwoń pod numer **1-877-320-1235 (TTY: 711)**.... **ATENÇÃO:** Se fala português, encontram-se disponíveis serviços linguísticos, grátis. Ligue para **1-877-320-1235 (TTY: 711)**.... **ATTENZIONE:** In caso la lingua parlata sia l'italiano, sono disponibili servizi di assistenza linguistica gratuiti. Chiamare il numero **1-877-320-1235 (TTY: 711)**... **ACHTUNG:** Wenn Sie Deutsch sprechen, stehen Ihnen kostenlos sprachliche

Hilfsdienstleistungen zur Verfügung. Rufnummer: **1-877-320-1235 (TTY: 711)**.... **注意事項:** 日本語を話される場合、無料の言語支援をご利用いただけます。 **1-877-320-1235 (TTY: 711)**まで、お電話にてご連絡ください。

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توجہ: اگر بہ زبان فارسی گفتگو می کنید، تسهیلات زبان‌ی بصورت رایگان برای شما فراهم می باشد. با  
شماره **1-877-320-1235 (TTY: 711)** تماس بگیرید.

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ملحوظة: إذا كنت تتحدث انكسر اللغة، فإن خدمات المساعدة اللغوية متوافرة لك بالمجان. اتصل برقم **1-877-320-1235**  
(رقم هاتف الصم والابكم: **711**).

GCHJV5REN 0117



Activation Code: <CODE>

**About the Equifax Credit Watch™ Gold with 3-in-1 Monitoring identity theft protection product:**

Equifax Credit Watch will provide you with an “early warning system” to changes to your credit file and help you to understand the content of your credit file at the three major credit-reporting agencies. Note: You must be over age 18 with a credit file in order to take advantage of the product.

**Equifax® Credit Watch™ Gold with 3-in-1 Credit Monitoring provides you with the following key features:**

- 3- Bureau credit file monitoring<sup>1</sup> and alerts of key changes to your Equifax®, Transunion®, and Experian® credit reports
- One Equifax 3-Bureau credit report
- Automatic Fraud Alerts<sup>2</sup> With a fraud alert, potential lenders are encouraged to take extra steps to verify your ID before extending credit
- Wireless alerts (available online only) Data charges may apply.
- Access to your Equifax® credit report
- Up to \$1 MM Identity Theft Insurance<sup>3</sup>
- Live agent Customer Service 7 days a week from 8 a.m. to 3 a.m.

**How to Enroll: You can sign up online or over the phone**

**To sign up online for online delivery go to**  
[www.myservices.equifax.com/tri](http://www.myservices.equifax.com/tri)

- 1. Welcome Page:** Enter the Activation Code provided above in the “Activation Code” box and click the “Submit” button.
- 2. Register:** Complete the form with your contact information (name, gender, home address, date of birth, Social Security Number and telephone number) and click the “Continue” button.
- 3. Create Account:** Complete the form with your email address, create a User Name and Password, review the Terms of Use and then check the box to accept and click the “Continue” button.
- 4. Verify ID:** The system will then ask you up to four security questions to verify your identity. Please answer the questions and click the “Submit Order” button.
- 5. Order Confirmation:** This page shows you your completed enrollment. Please click the “View My Product” button to access the product features.

**To sign up for US Mail delivery, dial 1-866-937-8432 for access to the Equifax Credit Watch Gold with 3-in-1 Credit Monitoring automated enrollment process. Note that all credit reports and alerts will be sent to you via US Mail only.**

- 1. Activation Code:** You will be asked to enter your Activation Code provided above.
- 2. Customer Information:** You will be asked to enter your home telephone number, home address, name, date of birth and Social Security Number.
- 3. Permissible Purpose:** You will be asked to provide Equifax with your permission to access your credit file and to monitor your file. Without your agreement, Equifax cannot process your enrollment.
- 4. Order Confirmation:** Equifax will provide a confirmation number with an explanation that you will receive your Fulfillment Kit via the US Mail (when Equifax is able to verify your identity) or a Customer Care letter with further instructions (if your identity can not be verified using the information provided). Please allow up to 10 business days to receive this information.

1. Credit monitoring from Experian® and Transunion® will take several days to begin.

2. The Automatic Fraud Alert feature is made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC.

3. Identity theft insurance is underwritten by American Bankers Insurance Company of Florida or its affiliates. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions and exclusions of coverage. Coverage may not be available in all jurisdictions.

