

Evan W. Hurst
Senior Attorney

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JUN 06 2019

CONSUMER PROTECTION



evan.hurst@jackson.com

State of New Hampshire
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

VIA FIRST CLASS MAIL

May 30, 2019

Re: Notification of Potential Breach of Security

Dear Office of the Attorney General:

We write to report a potential privacy incident that may have involved personal information of contract holders of Jackson National Life Insurance Company ("Jackson").

Mediant Communications Inc. ("Mediant") is a service provider that distributes proxy materials and tabulates voting results for shareholder meetings on behalf of investment companies, including Jackson National Asset Management, LLC (affiliate of Jackson National Life Insurance Company ("Jackson")). Mediant received personal information of our contract holders in order to prepare and process proxy materials to be mailed to them. On May 21, 2019, Mediant notified us that a malicious party may have obtained access to certain Mediant business email accounts containing personal information of approximately 33,000 of Jackson's contract holders.

On April 1, 2019 Mediant discovered the unauthorized access. The same day, Mediant disconnected the affected email server from its system, and began an investigation to understand the nature and scope of the incident. Mediant's investigation determined that personal information related to Jackson contract holders was among the information potentially impacted. The following personal information of contract holders may have been involved in the incident: name, address, policy number, owner/annuitant designation, plan code, issue date, sub-account identification number, fund units, fund value, and email address (for those individuals signed up for e-delivery).

Jackson is taking this incident very seriously. We have taken steps to be sure that Mediant strengthens the protection of personal information, including by updating its network security controls and email system. We will continue to closely monitor and take further steps as appropriate to safeguard such information. Mediant reported the matter to law enforcement but notice to affected individuals will not be delayed.

Out of respect of our customers personal information, and out of an abundance of caution, we are sending notification letters out to all contract holders whose personal information may have been accessed. In addition, we are offering a two-year subscription to Experian IdentityWorks credit monitoring services to all affected individuals. Further information about what Jackson has done and what we plan to communicate to the affected individuals can be found in the enclosed notification letter that Jackson will send to the approximately 276 New Hampshire residents.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Evan Hurst". The signature is fluid and cursive, with a large initial "E" and a long, sweeping underline.

Evan Hurst
Privacy Officer

Enclosures



evan.hurst@jackson.com

Evan W. Hurst
Privacy Officer

<<Name>>
<<Address>>
<<City>><<State>><<Zip>>
<<Country>>

<<Date>>

Re: Important Privacy and Protection Notification

Dear <<Name>>,

We write to inform you of an issue that may have involved some of your personal information.

What Happened?

Mediant Communications Inc. ("Mediant") is a third-party service provider that distributes proxy materials and records voting results for shareholder meetings on behalf of Jackson. Mediant received your personal information from Jackson to prepare and process proxy materials to be mailed to you.

On April 1, 2019, an unknown malicious party may have obtained unauthorized access to certain Mediant business email accounts containing your personal information. On that same day, following the discovery of the unauthorized access, Mediant disconnected the affected email server from its system and began an investigation to understand the nature and scope of the incident. During this investigation, Mediant learned that information used to mail proxy materials to certain Jackson policy holders was among the information potentially impacted. On May 21, 2019, based upon information provided by Mediant, Jackson was able to determine the scope of the breach, including the contract number and residence state of all affected individuals

What Information Was Involved?

The following personal information may have been involved in the incident: your full name, address, contract number, owner/annuitant designation, issue date of the policy, gender, sub-account fund identification number, fund units owned, whether individuals signed up for e-delivery for the prospectus, and email address (only for those individuals signed up for e-delivery).

What We Are Doing.

We are taking this incident very seriously. We have taken steps to be sure that Mediant strengthens the protection of personal information by updating its network security controls and email system. We will continue to closely monitor and take further steps as appropriate to safeguard your personal information. Mediant has reported the matter to law enforcement, but this notice has not been delayed because of law enforcement investigation.

In addition, we are offering credit monitoring for a period of 24 months at no cost to you. To take advantage of this offer:

- Ensure that you enroll by: **[enrollment end date]** (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: www.experianidworks.com/credit
- Provide your activation code: <<activation code>>

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 866-362-1769 by **[enrollment end date]**. Be prepared to provide engagement number **[engagement #]** as proof of eligibility for the identity restoration services by Experian. ***If you have more than one contract impacted, you will receive individual letters for each contract and need only enroll one time.***

What You Can Do.

It is always a good practice to be vigilant and closely review or monitor your financial accounts, statements, credit reports and other financial information for any evidence of unusual activity, fraudulent charges or signs of identity theft. In addition, because the malicious third-party may have obtained your email address, please be particularly vigilant for emails that attempt to get you to provide personal information in response or otherwise seem suspicious. Additionally, changing your password and security questions and enrolling in dual-factor authentication on all your accounts may assist in protecting against identity theft. Please see the attachment for additional information that may be helpful to you.

For More Information. If you have any questions regarding the content of this notice, please contact Jackson's Customer Service Center, via telephone: 800.565.0547 ext. 20130 or email: customercare@jackson.com.

Sincerely,

Evan Hurst
Privacy Officer

Additional Information

Please note that you can contact the Federal Trade Commission ("FTC") and the national consumer reporting agencies for more information on fraud alerts, security freezes and other steps you can take to avoid identity theft:

Equifax, P.O. Box 105788, Atlanta, Georgia 30348, 1-877-478-7625, www.equifax.com

Experian, P.O. Box 2002, Allen, TX 75013, 1-888-397-3742, www.experian.com

TransUnion, P.O. Box 2000, Chester, PA 19016, 1-800-680-7289, www.transunion.com

Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, D.C. 20580, 1-877-FTC-HELP (382-4357), www.ftc.gov/idtheft

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 above.

Additional information about security freezes is included below. Please also note that you can report any suspected incidents of identity theft to law enforcement, your state's attorney general and the FTC. In certain states, you may also obtain any police report filed about this issue.

Additional Information for Maryland Residents. You can obtain information from the Maryland Office of the Attorney General about steps you can take to prevent identity theft. You can contact the MD Office of the AG at:

Maryland Office of the Attorney General
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
888-743-0023 (toll-free in Maryland)
410-576-6300
www.marylandattorneygeneral.gov

Additional Information for North Carolina Residents. You can obtain information from the North Carolina Attorney General's Office about steps you can take to prevent identity theft. You can contact the office of the NC AG's Office at:

North Carolina Attorney General's Office
9001 Mail Service Center
Raleigh, NC 27699-9001
877-566-7226 (toll-free in North Carolina)
919-716-6400
www.ncdoj.gov

Additional Information for Rhode Island Residents. You can obtain information from the Rhode Island Office of the Attorney General about steps you can take to prevent identity theft. You can contact the office of the RI AG at:

Rhode Island Office of the Attorney General
Consumer Protection Unit
150 South Main Street
Providence, Rhode Island 02903
401-274-4400
www.riag.ri.gov

Additional Information About Security Freezes. You also have a right to place a “security freeze” on your credit report at no charge, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. In addition, a security freeze does not apply to a person or entity, or its affiliates, or collection agencies acting on behalf of the person or entity, with which you have an existing account that requests information in your credit report for the purposes of reviewing or collecting the account. Reviewing the account includes activities related to account maintenance, monitoring, credit line increases, and account upgrades and enhancements.

If you wish to place a security freeze on your credit file, you must separately place a security freeze on your credit file at each credit reporting agency. In order to place a security freeze, you may need to provide the following information: (1) Full name (including middle initial as well as Jr., Sr., II, III, etc.); (2) Social Security Number; (3) Date of birth; (4) Addresses for the prior five years; (5) Proof of current address; and (6) A legible copy of a government issued identification card. You can contact each credit reporting agency below for details on what information each company requires and to place a security freeze on your credit file:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
800-349-9960
www.equifax.com

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
888-397-3742
www.experian.com

TransUnion
P.O. Box 160
Woodlyn, PA 19094
888-909-8872
www.transunion.com

Additional Information About Credit Monitoring

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration agents are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at 866-362-1769. If, after discussing your situation with an agent, it is determined that Identity Restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this Identity Restoration support is available to you for two years from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

* Offline members will be eligible to call for additional reports quarterly after enrolling

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). 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