



Brenda R. Sharton
+1 617 570 1214
bsharton@goodwinlaw.com

Goodwin Procter LLP
100 Northern Avenue
Boston, MA 02210

goodwinlaw.com
+1 617 570 1000

March 28, 2019

RECEIVED

APR 01 2019

CONSUMER PROTECTION

VIA FEDEX

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

Re: Notice of Data Security Incident

Dear Sir/Madam:

We write on behalf of John Hancock Financial Network ("JHFN") to notify you of a data security incident that its former subsidiary, Signator Investors, Inc. ("Signator"), recently experienced. Specifically, in March 2019 Signator finalized a list of individuals whose personal information was potentially affected by an unauthorized email intrusion into certain Signator business email accounts. Signator first discovered possible unauthorized access to the accounts in August 2018.

Signator and its email hosting provider promptly retained cybersecurity specialists and shut down the unauthorized access, including resetting user passwords and heightening client account monitoring. JHFN reported the matter to law enforcement and with Signator undertook a comprehensive analysis of the messages and attachments in the email accounts to determine the nature of any personal information contained in them that could potentially have been viewed without authorization. The personal information at issue varies depending on the individual, but typically includes information such as name and address, insurance application information, and, in some circumstances, social security number and health information. JHFN completed the complex analysis in March 2019, and identified one New Hampshire resident potentially impacted by the incident.

JHFN also is taking action to provide assistance to potentially-affected persons, even though it has no evidence their personal information was actually accessed or misused. JHFN will notify affected individuals by mail, and will provide 24 months of identity theft resolution services from Experian IdentityWorks, at no charge. JHFN also will recommend steps individuals can take to protect themselves, such as regularly monitoring financial statements and credit reports. A template copy of the incident notification letter that JHFN will send affected persons is attached to this notice.

Thank you for your attention to this matter.



Office of the Attorney General
March 28, 2019
Page 2

Sincerely,

Brenda R. Sharton

Brenda R. Sharton

Enclosure

John Hancock Financial Network

197 Clarendon Street, C-5
Boston, Massachusetts 02116



Glenn Daly
Chief Privacy Officer

{First Name Middle Name Last Name}
{Street Address}
{City, State, ZIP}

March 22, 2019

Dear {First Name Middle Name Last Name},

We are writing to inform you about an email phishing incident that occurred affecting the email systems of Signator Investors, Inc. ("Signator"), a former subsidiary of John Hancock Financial Network. You are receiving this notice because this incident potentially affects you. Please read below for additional information about the matter and for additional details on steps you can take to help protect yourself.

WHAT HAPPENED

On approximately August 15, 2018, Signator first discovered possible unauthorized access to the hosted business email accounts belonging to a limited number of Signator users who reported unusual email activity.

Signator and its email hosting provider promptly retained cybersecurity specialists and shut down the unauthorized access, including resetting user passwords and heightening client account monitoring. John Hancock reported the matter to law enforcement and Signator undertook a comprehensive analysis of the messages and attachments in the email accounts to determine the nature of any personal information contained in them that could potentially have been viewed without authorization.

WHAT INFORMATION WAS INVOLVED

While we have no evidence that anyone's personal information was in fact accessed, we are sending you this notice because we cannot rule out the possibility that it was. Our extensive analysis of the email messages potentially accessed, which we completed in February 2019, shows that the personal information of yours that that could have been viewed includes your: name and {address, Social Security Number, email address, date of birth, driver's license number, account number, health information, passport number}.

WHAT WE ARE DOING

Although we have no evidence that anyone's personal information has been misused, as a precaution, we have arranged to make available to you 24 months of identity theft resolution services provided by Experian IdentityWorksSM, at no charge. Details on how to enroll are enclosed. Please note that you must enroll to take advantage of this free service and we encourage you to do so.

WHAT YOU CAN DO

As always, we recommend you be on the alert for email messages that request financial or personal information, ask you to open documents attached to a message or appearing to be available in a hyperlink, and to look out for suspicious activity on your financial accounts and credit reports. We encourage you to regularly monitor your statements to ensure there are no transactions or other activities that you did not initiate or authorize. You should report any suspicious activity to your financial advisor or the appropriate financial institution or service provider.

FOR MORE INFORMATION

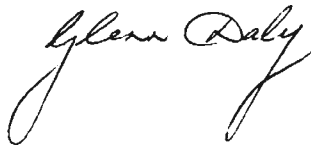
Signator Investors, Inc. was acquired by another firm as of November 2, 2018, which is why this notification is being communicated to you by John Hancock Financial Network.

We regret this incident and apologize for any concern or inconvenience it may cause you.

If you have questions about it or the status of your financial accounts, please contact your financial advisor named below directly.

You may also call John Hancock Financial Network toll-free at -1-844-261-9739 Monday-Friday between 9:00 a.m. to 5:00 p.m. Eastern.

Sincerely,

A handwritten signature in cursive script that reads "Glenn Daly". The signature is written in black ink and is positioned above the printed name and title.

Glenn Daly
Chief Privacy Officer

CC: {Name}, Financial Advisor

EXPERIAN FRAUD RESTORATION SUPPORT AND IDENTITYWORKS MEMBERSHIP

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. 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 offer 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.

While Identity Restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorksSM as a complimentary two-year membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information please follow the steps below:

1. Ensure that you **enroll by: 6/30/2019** (Your code will not work after this date.)
2. **Visit** the Experian IdentityWorks website to enroll: www.ExperianIdWorks.com/3bplus
3. Provide your **activation code: {Activation Code}**

If you have questions about the product, need assistance with identity restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at **877-890-9332** by 6/30/2019. Be prepared to provide engagement number **DB11353** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 24-MONTH IDENTITYWORKS MEMBERSHIP:

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, Equifax and Transunion files for indicators of fraud.
- **Internet Surveillance:** Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- **Identity Restoration Resolution:** 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.
- **\$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* 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.

Please note that these services offered by Experian do not protect you from online account takeovers, medical identity theft, or tax fraud.

ADDITIONAL ACTIONS TO HELP REDUCE YOUR CHANCES OF IDENTITY THEFT

PLACE A 90-DAY FRAUD ALERT ON YOUR CREDIT FILE

An **initial 90-day security alert** indicates to anyone requesting your credit file that you suspect you are a victim of fraud. When you or someone else attempts to open a credit account in your name, increase the credit limit on an existing account, or obtain a new card on an existing account, the lender should take steps to verify that you have authorized the request. If the creditor cannot verify this, the request should not be satisfied. You may contact one of the credit reporting companies below for assistance.

Equifax
1-800-525-6285
www.equifax.com

Experian
1-888-397-3742
www.experian.com

TransUnion
1-800-680-7289
www.transunion.com

PLACE A SECURITY FREEZE ON YOUR CREDIT FILE

If you are very concerned about becoming a victim of fraud or identity theft, a security freeze might be right for you. Placing a freeze on your credit report will prevent lenders and others from accessing your credit report entirely, which will prevent them from extending credit. With a security freeze in place, you will be required to take special steps when you wish to apply for any type of credit. This process is also completed through each of the credit reporting companies free of charge.

ORDER YOUR FREE ANNUAL CREDIT REPORTS

Visit www.annualcreditreport.com or call 877-322-8228. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

MANAGE YOUR PERSONAL INFORMATION

Take steps such as: carrying only essential documents with you; being aware of whom you are sharing your personal information with and shredding receipts, statements, and other sensitive information.

USE TOOLS FROM CREDIT PROVIDERS

Carefully review your credit reports and bank, credit card and other account statements. Be proactive and create alerts on credit cards and bank accounts to notify you of activity. If you discover unauthorized or suspicious activity on your credit report or by any other means, file an identity theft report with your local police and contact a credit reporting company.

OBTAIN MORE INFORMATION ABOUT IDENTITY THEFT AND WAYS TO PROTECT YOURSELF

- Visit <http://www.experian.com/credit-advice/topic-fraud-and-identity-theft.html> for general information regarding protecting your identity.
- The Federal Trade Commission has an identity theft hotline: 877-438-4338; TTY: 1-866-653-4261. They also provide information on-line at www.ftc.gov/idtheft
- **For residents of North Carolina:** You may also obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office: 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, www.ncdoj.gov.
- **For residents of Maryland:** You may also obtain information about preventing and avoiding identity theft from the Maryland Office of the Attorney General: 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us.

- **For residents of Massachusetts:** Under Massachusetts law, you have the right to obtain a police report filed in regard to this incident, if one was filed. A copy of a police report may be required by creditors to clear up your records.

To request a security freeze under Massachusetts law, you must make the request to all three credit agencies. They may ask you to provide the following information in order to place a freeze on your credit report:

- Your full name, address, Social Security number, and date of birth;
- Addresses where you lived over the previous five years;
- Proof of current address such as a utility or phone bill;
- A photocopy of a government issued identification card;
- If you are an identity theft victim, include a copy of the police report, investigative report, or complaint; and
- If you are not a victim of identity theft, include a payment by check, money order, or credit card.

If you have been a victim of identity theft, and you provide the credit reporting agency with a valid police report, it cannot charge you to place, lift or remove a security freeze. In all other cases, a credit reporting agency may charge up to \$5 each to place, lift or remove a security freeze. For additional information, please visit <https://www.mass.gov/how-to/request-a-credit-report-security-freeze>.

WHAT ELSE CAN YOU DO TO PROTECT YOUR INFORMATION

There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information.