

Principal Financial Group  
711 High Street  
Des Moines, IA 50392

STATE OF NH  
DEPT OF JUSTICE  
2017 MAR -3 AM 11:47



February 27, 2017

Mr. Joseph Foster  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

Re: Inadvertent Breach of Personally Identifiable Information

Dear Mr. Foster:

I write to inform you of an inadvertent disclosure of personally identifiable data that occurred February 7, 2017. A January 2017 Contribution Report was mistakenly sent to an incorrect plan sponsor. Although sent securely (encrypted), the report contained personal information, including name and social security number. We instructed the receiving plan sponsor to delete the report, which they have confirmed they did. All impacted individuals have been notified and offered credit monitoring. A copy of the letter is enclosed.

**Summary of Incident:**

**How Discovered** – We were notified by the plan sponsor who received the incorrect report.

**Has lost, stolen, or breached information been recovered** – The recipient was asked to destroy the report.

**Have individuals involved in the incident (both internal and external) been identified** – Yes

**Has a police report been filed** – No

**Type of information lost, stolen or breached** – Name and Social Security number

**Was information encrypted** – Yes

**Lost, stolen or breached information covers what period of time** – The 2017 Contribution Report was sent February 7, 2017.

**How many residents affected** – 2 New Hampshire residents were impacted.

**Results of any internal review identifying either a lapse in internal procedures or confirmation that all procedures were followed** – It was an isolated incident caused by human error. The employee has been counseled and mitigating measures implemented.

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Please do not hesitate to contact me if you have questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rick Gubbels', written over a light blue horizontal line.

Rick Gubbels  
Chief Privacy Officer  
Principal Financial Group  
Des Moines, Iowa 50392-0300  
(515) 248-8638  
FAX (866) 496-6527  
[gubbels.rick@principal.com](mailto:gubbels.rick@principal.com)

Enclosure

Principal Financial Group  
711 High Street  
Des Moines, IA 50392



STATE OF NH  
DEPT OF JUSTICE  
2017 MAR -3 AM 11:47

February 24, 2017

Promotion Code:

NAME  
ADDRESS  
ADDRESS

Re:

Dear \_\_\_\_\_:

The purpose for our letter is to notify you that your personal information was included in a January 2017 Contribution Report, which was sent to an incorrect plan sponsor on February 7, 2017. The 2017 Contribution Report contained your personal information, including your name and social security number. We have instructed the receiving plan sponsor to delete the report, which they have confirmed they did. Although your personal information may have been compromised, we feel the risk of something occurring is minimal.

In light of this incident, and as a precaution against the misuse of your information, we have arranged with Equifax Personal Solutions to help you protect your identity and your credit information at no cost to you. The steps to follow are:

1. Enroll in Equifax Credit Watch™ Gold with 3-in-1 Monitoring identity theft protection product. This product is being provided to you at no cost for one year.
2. Additionally, you may choose to adopt an increased level of protection by placing a fraud alert on your credit file at Equifax and the other two credit reporting agencies

Enroll in Equifax Credit Watch™ Gold with 3-in-1 Monitoring

Equifax Credit Watch will provide you with an "early warning system" to changes to your credit file and help you to understand the Promotion Code: content of your credit file at the three major credit reporting agencies. The key features and benefits are listed below.

Equifax Credit Watch provides you with the following benefits:

- Comprehensive credit file monitoring and automated alerts of key changes to your Equifax, Experian, and TransUnion credit reports
- Wireless alerts and customizable alerts available
- One 3-in-1 Credit Report and access to your Equifax Credit Report™
- Up to \$1 million in identity theft insurance with \$0 deductible, at no additional cost to you †
- 24 by 7 live agent Customer Service to assist you in understanding the content of your Equifax credit information, to provide personalized identity theft victim assistance and in initiating an investigation of inaccurate information.
- 90 day Fraud Alert placement with automatic renewal functionality (available online only).

† Insurance underwritten by member companies of American International Group, Inc. The description herein is a summary only. It does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for complete details of coverage and exclusions. This product is not intended for minors (under 18 years of age).

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### How to Enroll

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

*Note: You MUST register using the above link*

1. Consumer Information: complete the form with your contact information (name, address and e-mail address) and click "Continue" button. The information is provided in a secured environment.
2. Identity Verification & Payment Information: complete the form with your Social Security Number, date of birth, telephone numbers, create a User Name and Password, agree to the Terms of Use and enter the promotion code provided at the top of your letter in the "Enter Promotion Code" box and click "Continue" button. This code eliminates the need to provide a credit card number for payment. The system will ask you up to two security questions. This is the Equifax Identity Verification Process.
3. Order Summary: click "Continue" button.
4. Order Confirmation: – Click "View My Product" to access your 3-in-1 Credit Report and other product features.

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

1. Promotion Code: You will be asked to enter your promotion code as provided at the top of your letter.
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 cannot be verified using the information provided). Please allow up to 10 business days to receive this information.

### Directions for placing a Fraud Alert

A fraud alert is a consumer statement added to your credit report. This statement alerts creditors of possible fraudulent activity within your report as well as requests that they contact you prior to establishing any accounts in your name. Once the fraud alert is added to your credit report, all creditors should contact you prior to establishing any account in your name. To place a 90 day fraud alert on your credit file, log into the Equifax Member Center and click on the fraud alert tab, visit [www.fraudalerts.equifax.com](http://www.fraudalerts.equifax.com) or call the Equifax auto fraud line at 1-877-478-7625, and follow the simple prompts. Once the fraud alert has been placed with Equifax, a notification will be sent to the other two credit reporting agencies, Experian and Trans Union, on your behalf. Fraud alerts last 90 days unless you manually renew it or use the automatic fraud alert feature within your Credit Watch subscription.

Experian  
(888) 397-3742  
P.O. Box 9532

Equifax  
(877) 478-7625  
P.O. Box 740241

TransUnion  
(800) 680-7289  
P.O. Box 6790

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Allen, TX 75013  
[www.experian.com](http://www.experian.com)

Atlanta, GA 30374-0241  
[www.equifax.com](http://www.equifax.com)

Fullerton, CA 92834-6790  
[www.transunion.com](http://www.transunion.com)

- You can obtain a free copy of your credit report from each of the three nationwide consumer reporting agencies by calling 1-877-322-8228 or online at: [www.annualcreditreport.com](http://www.annualcreditreport.com). Under federal law, you are entitled to one free copy of your credit report every 12 months from each of the three major credit reporting agencies. You may want to obtain copies of your credit report to ensure the accuracy of the report information.
- To learn more about protecting yourself from identity theft and to report incidents of identity theft, please contact the following:

**Federal Trade Commission**  
1-877-ID-THEFT (1-877-438-4338)  
Consumer Response Center  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
[www.consumer.gov/idtheft](http://www.consumer.gov/idtheft), or [www.ftc.gov/credit](http://www.ftc.gov/credit)

Directions for placing a security freeze on your credit report

To place a security freeze on your credit report, you must send a written request to **each** of the three major consumer reporting agencies: Equifax ([www.equifax.com](http://www.equifax.com)); Experian ([www.experian.com](http://www.experian.com)); and TransUnion ([www.transunion.com](http://www.transunion.com)) by regular, certified or overnight mail at the addresses below:

**Equifax Security Freeze**  
P.O. Box 105788  
Atlanta, GA 30348

**Experian Security Freeze**  
P.O. Box 9554  
Allen, TX 75013

**Trans Union Security Freeze**  
Fraud Victim Assistance Dept.  
P.O. Box 6790  
Fullerton, CA 92834

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security Number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
5. Proof of current address such as a current utility bill or telephone bill;
6. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.)
7. If you are a victim of identity theft, include a copy of the police report, investigative report, or complaint to a law enforcement agency concerning identity theft;
8. If you are not a victim of identity theft, include payment by check, money order, or credit card (Visa, MasterCard, American Express or Discover only). Do not send cash through the mail.

The credit reporting agencies have three (3) business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with a unique personal identification

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number (PIN) or password, or both that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, you must call or send a written request to the credit reporting agencies by mail and include proper identification (name, address, and social security number) **and** the PIN number or password provided to you when you placed the security freeze as well as the identities of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have three (3) business days after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must send a written request to each of the three credit bureaus by mail and include proper identification (name, address, and social security number) **and** the PIN number or password provided to you when you placed the security freeze. The credit bureaus have three (3) business days after receiving your request to remove the security freeze.

The Principal Financial Group® takes the matter of information security very seriously and we sincerely regret and apologize for this error. Please be assured that we continually evaluate how to best protect the personal information of customers in order to minimize the risk of identity theft.

Sincerely,

Participant Contact Center  
Principal Financial Group  
1-800-547-7754