

Principal Financial Group
711 High Street
Des Moines, IA 50392



March 13, 2017

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

STATE OF NH
DEPT OF JUSTICE
2017 MAR 17 AM 10:29

Re: Inadvertent Breach of Personally Identifiable Information

Dear Attorney General Foster:

I am writing to inform you of an inadvertent disclosure of personally identifiable information impacting four New Hampshire residents. The incident was identified on March 2, 2017 when we were notified by our eBenefits platform vendor that files were sent in error to Chard Snyder, a third party COBRA vendor. The information included the name, address, home phone number, Social Security number, and COBRA eligibility information. Although we do not believe the exposure of the information put at risk the personal, financial, or physical well-being of the affected participants, we are notifying the impacted individuals of the disclosure and offering credit monitoring. (Copy attached.)

How Discovered – One of our employer groups contacted us when their employee brought them a COBRA notice they received from Chard Snyder who is not their COBRA vendor. We reached out to our eBenefits platform vendor who then identified there was an inadvertent disclosure of information.

Has lost, stolen, or breached information been recovered – Yes.

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, address, home phone number, Social Security number and COBRA eligibility information.

Was information encrypted – Yes.

Lost, stolen or breached information covers what period of time – Our third party eBenefits platform vendor sent a file on 2/3/17 and on 2/10/17 to Chard Snyder, a COBRA vendor. Two files were sent, however, Chard Snyder only uploaded one of the files. For those individuals that were uploaded employees received a COBRA Election Notice from Chard Snyder dated February 22, 2017.

How many New Hampshire residents affected – Four New Hampshire residents were impacted.

Results of any internal review identifying either a lapse in internal procedures or confirmation that all procedures were followed – This mistake was caused by human error. The employee has been counseled and provided guidance on how to prevent this type of incident in the future. In addition, a full investigation into their processes/ procedures is being conducted.

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

Sincerely,



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

Attached



March X, 2017

Name
 Address
 Address
 City State Zip

NOTICE OF DATA BREACH

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|---------------------------------------|---|
| <p>What Happened:</p> | <p>COBRA eligibility files (two) were transmitted from our eBenefits platform vendor, Businessolver, to a third party COBRA vendor - Chard Snyder in error. Chard Snyder uploaded one of the files into their system and sent out COBRA Election Notices dated February 22, 2017 to those individuals included on the file. The other file was deleted by Chard Snyder and no correspondence was sent to those individuals. If you received the correspondence from Chard Snyder, you may disregard it. However, you will need to take action on any COBRA notices you receive that are not from Chard Snyder.</p> |
| <p>What Information was involved:</p> | <p>The files contained your name, Social Security Number (SSN), address, date of birth, home phone number, eligibility information, and any applicable dependent names, SSNs, and dates of birth.</p> |
| <p>What we are doing:</p> | <p>Both files have been deleted by Chard and for those individuals that were uploaded in their system, they are completely deleting your information from their systems. In addition, we are working with Businessolver to evaluate their processes to ensure this type of thing doesn't happen again.</p> <p>As a precaution against the remote risk of misuse of your information, we would like to extend an offer to you to pay for a one year subscription to Equifax Credit Watch, a credit monitoring service that will "alert" you regarding certain changes/activity in your credit file. The service also provides identity theft insurance. To take advantage of this offer, <u>you must enroll for the Equifax Credit Watch services by April X, 2017.</u> Attached is information describing the enrollment process, including an individual promotional code that is required to enroll in the program at no cost to you.</p> <p>Enroll at www.myservices.equifax.com/tri. Your personal Equifax Code is XXXXXXXXXX</p> |
| <p>What you can do:</p> | <p>You may also choose to:</p> <ul style="list-style-type: none"> • Review your account statements often and report any suspicious |



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| | <p>activity immediately to the service provider.</p> <ul style="list-style-type: none">• Protect all of your accounts with a personal identification number (PIN) or password. Do not use any part of your Social Security number as a PIN or password. <p>Protect yourself from identity theft by reviewing and acting upon Federal Trade Commission information that can be found at http://www.consumer.gov/idtheft/ or call 1-877-FTC-HELP (1-877-382-4357). If you suspect your identity has been stolen, contact the Federal Trade Commission at 1-877-ID-THEFT (1-877-438-4338).</p> |
| Other important information: | The attached information also provides additional steps you can use to protect yourself from identity theft. |
| For more information: | If you have any questions, please don't hesitate to contact me at the information provided below. |

Please be assured we take the matter of information security very seriously and we sincerely regret and apologize for this incident.

Sincerely

Lynn McKnight
Privacy Consultant
711 High Street
Des Moines, IA 50392
Phone: 1-800-986-3343 Ext. 67195
Fax: 844-315-4998

cc Rick Gubbels, Chief Privacy Officer

Attachments

Promotion Code: XXXXXXXXXXXX

The following are instructions for enrolling in the Equifax Credit Watch™ Gold with 3-in-1 Monitoring Identity Theft protection.

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 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)

How to Enroll

To sign up online for **online delivery** go to 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.

† 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).



2. Identity Verification & Payment Information: complete the form with your Social Security Number, date of birth, telephone #s, 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. 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 can not be verified using the information provided). Please allow up to 10 business days to receive this information.

There are other steps you can take to further protect yourself against identity theft or other unauthorized use of personal information if you are concerned.

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 or call our 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.

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| Experian (888) 397-3742 P.O. Box 9532 Allen, TX 75013 6790 www.experian.com | Equifax (877) 478-7625 P.O. Box 740241 Atlanta, GA 30374-0241 www.equifax.com | TransUnion (800) 680-7289 P.O. Box 6790 Fullerton, CA 92834-6790 www.transunion.com |
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- 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. 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, or 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); Experian (www.experian.com); and TransUnion (www.transunion.com) by regular, certified or overnight mail at the addresses below:

| Equifax Security Freeze | Experian Security Freeze | Trans Union Security |
|---|--------------------------------------|---|
| Freeze P.O. Box 105788 Dept. Atlanta, GA 30348 | P.O. Box 9554 Allen, TX 75013 | Fraud Victim Assistance 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 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.