

Principal Financial Group®
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principal.com

STATE OF NH
DEPT OF JUSTICE

2019 JUL 22 PM 2: 01



July 17, 2019

Attorney General Gordon MacDonald
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Inadvertent Disclosure of Personally Identifiable Information

Dear Attorney General MacDonald:

I am writing to inform you of an inadvertent disclosure of personally identifiable information impacting two New Hampshire residents from January 9, 2018 to July 11, 2019. The personal information of two Principal Financial Group financial advisors/agents was contained in a file that was improperly uploaded on January 9, 2018 to a GitHub account (GitHub is a software development platform used to develop code). Principal identified the information on July 9, 2019 as part of our internal testing. We immediately contacted GitHub and verified that the information was removed on July 11, 2019.

How Discovered – Our internal testing identified the source code and personal information on GitHub.

Has lost, stolen, or breached information been recovered – We requested that the information be removed and deleted immediately. GitHub confirmed the information was no longer viewable and had been deleted.

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 – No

Lost, stolen or breached information covers what period of time – January 9, 2018 - July 11, 2019

How many New Hampshire residents affected – Two New Hampshire residents were impacted. The New Hampshire residents are being offered one year of credit monitoring. See attached letter.

Results of any internal review identifying either a lapse in internal procedures or confirmation that all procedures were followed. This incident was due to human error by a contractor working for Principal. The contractor has since left the company.

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

Sincerely,



Jeff Hicks

Assistant General Counsel
Principal Financial Group
Des Moines, Iowa 50392-0300
(515) 246-7614
FAX (866) 496-6527
hicks.jeff@principal.com

Attachment



Principal Financial Group
711 High Street
Des Moines, IA 50392

July 17, 2019

Name
Address
Address

NOTICE OF DATA BREACH

What Happened:	Your personal information was contained in a file that was improperly uploaded on January 9, 2018 to a GitHub account (GitHub is a software development platform used to develop code). We identified the information on July 9, 2019 as part of our internal testing.
What Information was involved:	The information included your name, social security number and information related to your appointment as an agent/advisor with Principal®.
What we are doing:	<p>Immediately upon identifying the incident, we requested and verified that this information has been removed from the GitHub site.</p> <p>We have no evidence that your personal information has been misused but we want to make you aware of the incident. As a precaution in case your information was accessed, 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. 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 Activation Code is [Insert Code]</p>
What you can do:	<p>You may also choose to:</p> <ul style="list-style-type: none">• Review your account statements often and report any suspicious activity immediately to the service provider.• Protect all 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 inform	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.

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 to minimize the risk of identity theft.

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

Enter your Activation Code: <INSERT ACTIVATION CODE>

Product Information

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

- 3-Bureau credit file monitoring¹ and alerts of key changes to your Equifax®, Transunion®, and Experian® credit reports
- One Equifax 3-Bureau credit report
- Automatic Fraud Alerts² 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 Insurance³
- Live agent Customer Service 7 days a week from 8 a.m. to 3 a.m.

Enrollment Instructions

To sign up online for online delivery go to 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.

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.

Equifax® is a registered trademark of Equifax Inc. ©2017 Equifax Inc., Atlanta, Georgia. All rights reserved.

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.

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.

Experian
(888) 397-3742
P.O. Box 9532
Allen, TX 75013
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

- 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

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

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.