

# ALSTON & BIRD

One Atlantic Center  
1201 West Peachtree Street  
Atlanta, GA 30309-3424  
404-881-7000 | Fax: 404-881-7777

James A. Harvey

Direct Dial: 404-881-7328

Email: [jim.harvey@alston.com](mailto:jim.harvey@alston.com)

August 4, 2021

CONFIDENTIAL  
VIA EMAIL

[DOJ-CPB@doj.nh.gov](mailto:DOJ-CPB@doj.nh.gov)

Re: Notice of Security Incident

To the Office of the Attorney General:

I am writing to you in my capacity as counsel to Transamerica Retirement Solutions, LLC (“Transamerica”) to inform you of a potential security incident that may have involved access to the personal information of 20 New Hampshire residents. Transamerica is a financial services company with offices at 4333 Edgewood Road, NE, Cedar Rapids, Iowa 52499.

Transamerica administers 401k plans for certain employers. On June 14, 2021, Transamerica learned that a change made to one of its plan administration websites on June 4, 2021 inadvertently allowed employers to access certain information of employees other than their own. The information was only accessible to administrators who were authorized to log into the website with valid credentials and was not exposed to unauthorized internet access. After learning of the issue, Transamerica immediately corrected the error to prevent any further access by unauthorized administrators of employers. The potentially affected information included name, address, Social Security number, date of birth, and figures related to retirement plan contributions. We are unaware of any misuse of information in connection with this incident at this time.

Transamerica is also providing an informational notice to 1 New Hampshire resident out of an abundance of caution.

In response to this Incident, Transamerica has arranged to provide two years of complimentary credit monitoring and identity theft protection services to the affected individuals. Transamerica has also flagged the affected accounts for special handling to prevent unauthorized persons from making changes to or accessing affected individuals’ account information.

A copy of the notification being sent to New Hampshire residents by first class mail is attached to this letter. The notification will be sent on August 4, 2021.

If you have any questions regarding this incident or if you desire further information or assistance, please email me at [Jim.Harvey@alston.com](mailto:Jim.Harvey@alston.com) or call my direct line at (404) 881-7328.

Sincerely,

A handwritten signature in blue ink that reads "Jim Harvey". The signature is written in a cursive style with a large, looping "H" at the end.

James A. Harvey



August , 2021



Dear :

### **Notice of Data Breach**

We at Transamerica Retirement Solutions, LLC (“Transamerica”) are writing to inform you of an information breach involving some of your personal information. This letter explains what happened and offers credit monitoring services and information to help protect against the potential for identity theft.

#### **What Happened**

Transamerica administers 401k plans for certain employers, including your employer. On June 14, 2021, Transamerica learned that a change to one of our plan administration websites in early June 2021 inadvertently allowed employers other than yours to access certain information about your retirement contributions. This information was only accessible to administrators who were authorized to log into the website with valid credentials and was not exposed to unauthorized internet access. After learning of the issue, Transamerica immediately corrected the error to prevent any further access by administrators for employers other than your own. We are unaware of any misuse of information in connection with this incident at this time.

#### **What Information Was Involved**

The information that may have been accessed included your name, address, Social Security number, date of birth, and financial details related to retirement plan contributions.

#### **What We Are Doing**

When we learned of the incident, we promptly launched an investigation led by counsel. Although we have completed our investigation and found no evidence that your information was misused or further disclosed, we have arranged to provide you with two (2) years of identity monitoring service at our expense (see details below) to assist you in protecting your information.



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## What You Can Do

We recommend that you take some simple and no-cost steps to help protect against the possibility of identity theft.

We encourage you to be vigilant with respect to carefully reviewing any account/policy statements and your credit reports. You should promptly report any suspicious activity or suspected identity theft to us and to proper law enforcement authorities, including your local law enforcement agency or your state's attorney general. We encourage you to enroll in the complimentary identity theft protection service that we have arranged for you. If you wish to receive this service, please see the enclosed instructions on how to enroll, along with Activation Code [REDACTED].

Even if you do not register for the credit monitoring service, we recommend that you periodically obtain your credit report from one or more of the national credit reporting companies listed in the attached Reference Guide.

You may also contact the Federal Trade Commission ("FTC") or the national credit reporting agencies to learn about preventing identity theft and to obtain additional information on identity theft, fraud alerts and security freezes.

Federal Trade Commission  
Consumer Response Center  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
1-877-IDTHEFT (438-4338)  
<http://www.ftc.gov/idtheft/>

## For More Information

We apologize for any inconvenience this incident may cause. If you have questions or concerns, please do not hesitate to contact us directly at [REDACTED].

Sincerely,

Transamerica



Enter your Activation Code:  
Enrollment Deadline:



## Equifax Complete™ Premier

\*Note: You must be over age 18 with a credit file to take advantage of the product

### Key Features

- Annual access to your 3-bureau credit report and VantageScore<sup>1</sup> credit scores
- Daily access to your Equifax credit report and 1-bureau VantageScore credit score
- 3-bureau credit monitoring<sup>2</sup> with email notifications of key changes to your credit reports
- WebScan notifications<sup>3</sup> when your personal information, such as Social Security Number, credit/debit card or bank account numbers are found on fraudulent Internet trading sites
- Automatic fraud alerts<sup>4</sup>, which encourages potential lenders to take extra steps to verify your identity before extending credit, plus blocked inquiry alerts and Equifax credit report lock<sup>5</sup>
- Identity Restoration to help restore your identity should you become a victim of identity theft, and a dedicated Identity Restoration Specialist to work on your behalf
- Up to \$1,000,000 of identity theft insurance coverage for certain out of pocket expenses resulting from identity theft<sup>6</sup>
- Lost Wallet Assistance if your wallet is lost or stolen, and one-stop assistance in canceling and reissuing credit, debit and personal identification cards.

### Enrollment Instructions

Go to [www.equifax.com/activate](http://www.equifax.com/activate)

Enter your unique Activation Code of [REDACTED] then click "Submit" and follow these 4 steps:

1. **Register:**

Complete the form with your contact information and click "Continue".

*If you already have a myEquifax account, click the 'Sign in here' link under the "Let's get started" header.*

*Once you have successfully signed in, you will skip to the Checkout Page in Step 4*

2. **Create Account:**

Enter your email address, create a password, and accept the terms of use.

3. **Verify Identity:**

To enroll in your product, we will ask you to complete our identity verification process.

4. **Checkout:**

Upon successful verification of your identity, you will see the Checkout Page.

Click 'Sign Me Up' to finish enrolling.

**You're done!**

The confirmation page shows your completed enrollment.

Click "View My Product" to access the product features.

<sup>1</sup>The credit scores provided are based on the VantageScore® 3.0 model. For three-bureau VantageScore credit scores, data from Equifax®, Experian®, and TransUnion® are used respectively. Any one-bureau VantageScore uses Equifax data. Third parties use many different types of credit scores and are likely to use a different type of credit score to assess your creditworthiness. <sup>2</sup>Credit monitoring from Experian and TransUnion will take several days to begin. <sup>3</sup>WebScan searches for your Social Security Number, up to 5 passport numbers, up to 6 bank account numbers, up to 6 credit/debit card numbers, up to 6 email addresses, and up to 10 medical ID numbers. WebScan searches thousands of Internet sites where consumers' personal information is suspected of being bought and sold, and regularly adds new sites to the list of those it searches. However, the Internet addresses of these suspected Internet trading sites are not published and frequently change, so there is no guarantee that we are able to locate and search every possible Internet site where consumers' personal information is at risk of being traded. <sup>4</sup>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. <sup>5</sup>Locking your Equifax credit report will prevent access to it by certain third parties. Locking your Equifax credit report will not prevent access to your credit report at any other credit reporting agency. Entities that may still have access to your Equifax credit report include: companies like Equifax Global Consumer Solutions, which provide you with access to your credit report or credit score, or monitor your credit report as part of a subscription or similar service; companies that provide you with a copy of your credit report or credit score, upon your request; federal, state and local government agencies and courts in certain circumstances; companies using the information in connection with the underwriting of insurance, or for employment, tenant or background screening purposes; companies that have a current account or relationship with you, and collection agencies acting on behalf of those whom you owe; companies that authenticate a consumer's identity for purposes other than granting credit, or for investigating or preventing actual or potential fraud; and companies that wish to make pre-approved offers of credit or insurance to you. To opt out of such pre-approved offers, visit [www.optoutprescreen.co](http://www.optoutprescreen.co). <sup>6</sup>The Identity Theft Insurance benefit is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company, under group or blanket policies issued to Equifax, Inc., or its respective affiliates for the benefit of its Members. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

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# Reference Guide

## Establish Login Credentials for Your Online Transamerica Account

If you have a Transamerica policy or account and have not done so already, it is important that you establish login credentials for your online account using a complex password. Use at least eight characters and mix numbers, upper- and lower-case letters, and symbols. Do not use names, dates, or words related to you. Remember not to share your passwords with anyone else - passwords should be for your eyes only.

## Order Your Free Credit Report

To order your free annual credit report, visit [www.annualcreditreport.com](http://www.annualcreditreport.com), call toll-free at (877) 322-8228, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's ("FTC") website at [www.ftc.gov](http://www.ftc.gov) and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. The credit bureaus provide free annual credit reports only through the website, toll-free number, or request form. In addition, you can also purchase a copy of your credit report at any time by contacting one of the three national credit reporting companies:

Equifax  
(800) 685-1111  
[www.equifax.com](http://www.equifax.com)  
P.O. Box 740241  
Atlanta, GA 30374-0241

Experian  
(888) 397-3742  
[www.experian.com](http://www.experian.com)  
P.O. Box 9532  
Allen, TX 75013

TransUnion  
(800) 916-8800  
[www.transunion.com](http://www.transunion.com)  
P.O. Box 6790  
Fullerton, CA 92834-6790

Upon receiving your credit report, review it carefully. Look for accounts you did not open. Look in the "inquiries" section for names of creditors from whom you have not requested credit. Some companies bill under names other than their store or commercial names; the credit bureau will be able to tell if this is the case. Look in the "personal information" section for any inaccuracies in information (such as address and Social Security Number).

If you see anything you do not understand, call the credit bureau at the telephone number on the report. Errors may be a warning sign of possible identity theft. You should notify the credit bureaus of any inaccuracies in your report, whether due to error or fraud, as soon as possible so the information can be investigated and, if found to be in error, corrected. If there are accounts or charges you did not authorize, immediately notify the appropriate credit bureau by telephone and in writing. Information that cannot be explained should also be reported to your local police or sheriff's office because it may signal criminal activity.

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## Place a Fraud Alert on Your Credit File

To protect yourself from possible identity theft, consider placing a fraud alert on your credit file. A fraud alert helps protect against the possibility of an identity thief opening new credit accounts in your name. When a credit grantor checks the credit history of someone applying for credit, the credit grantor gets a notice that the applicant may be the victim of identity theft. The alert notifies the credit grantor to take steps to verify the identity of the applicant. You can place a fraud alert on your credit report by calling any one of the toll-free fraud numbers provided below. You will reach an automated telephone system that allows flagging of your file with a fraud alert at all three credit bureaus.

Equifax	P.O. Box 740241 Atlanta, GA 30348	800 -525-6285	<a href="http://www.equifax.com">www.equifax.com</a>
Experian	P.O. Box 2002 Allen, TX 75013	888-397-3742	<a href="http://www.experian.com">www.experian.com</a>
TransUnion	P.O. Box 2000 Chester, PA 19016	800-916-8800	<a href="http://www.transunion.com">www.transunion.com</a>

## Security Freezes

You have the right to put a security freeze, also known as a credit freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A security freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a security freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a security freeze may delay your ability to obtain credit.

You have the right to request a credit freeze from a consumer reporting agency, free of charge. Unlike a fraud alert, you must contact the credit reporting agency by phone, mail, or secure electronic means and provide proper proof of your identity. To place a security freeze on your credit report you need to send a request to a consumer reporting agency by certified mail, overnight mail, or regular stamped mail. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, that person's information must be provided as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue.

Below is contact information for the three consumer reporting agencies:

Equifax Security Freeze	P.O. Box 105788 Atlanta, GA 30348	888-298-0045	<a href="http://www.equifax.com/personal/help">www.equifax.com/personal/help</a>
Experian Security Freeze	P.O. Box 9554 Allen, TX 75013	888-397-3742	<a href="http://www.experian.com">www.experian.com</a>
TransUnion	P.O. Box 2000 Chester, PA 19016	800-909-8872	<a href="http://www.transunion.com">www.transunion.com</a>

Once you have submitted your request, the credit reporting agency must place the security freeze no later than 1 business day after receiving a request by phone or secure electronic means, and no later than 3 business days after receiving a request by mail. No later than 5 business days after placing the security freeze, the credit reporting agency will send you confirmation and information on how to remove the freeze in the future.

## **For Residents of the District of Columbia**

You may contact the D.C. Attorney General's Office to obtain information about steps to take to avoid identity theft:

D.C. Attorney General's Office, Office of Consumer Protection, 400 6th Street, NW, Washington DC 20001, 1-202-442-9828, [www.oag.dc.gov](http://www.oag.dc.gov).

## **For Residents of Iowa**

To report suspected incidents of identity theft, you may contact law enforcement or the Iowa Attorney General's office, which can be reached at:

Iowa Attorney General's Office, Director of Consumer Protection Division, 1305 E. Walnut Street, Des Moines, IA 50319, 1-515-281-5926, [www.iowaattorneygeneral.gov](http://www.iowaattorneygeneral.gov)

## **For Residents of Maryland**

You may also obtain information about preventing and avoiding identity theft from:

Maryland Office of the Attorney General, Consumer Protection Division  
200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023  
[www.oag.state.md.us](http://www.oag.state.md.us)

## **For Residents of New Mexico**

New Mexico Consumers Have the Right to Obtain a Security Freeze or Submit a Declaration of Removal.

You may obtain a security freeze on your credit report to protect your privacy and ensure that credit is not granted in your name without your knowledge. You may submit a declaration of removal to remove information placed in your credit report as a result of being a victim of identity theft. You have a right to place a security freeze on your credit report or submit a declaration of removal pursuant to the Fair Credit Reporting and Identity Security Act.

The security freeze will prohibit a consumer reporting agency from releasing any information in your credit report without your express authorization or approval.

The security freeze is designed to prevent credit, loans and services from being approved in your name without your consent. When you place a security freeze on your credit report, you will be provided with a personal identification number, password or similar device to use if you choose to remove the freeze on your credit report or to temporarily authorize the release of your credit report to a specific party or parties or for a specific period of time after the freeze is in place. To remove the freeze or to provide authorization for the temporary release of your credit report, you must contact the consumer reporting agency and provide all of the following:

- (1) the unique personal identification number, password or similar device provided by the consumer reporting agency;
- (2) proper identification to verify your identity;
- (3) information regarding the third party or parties who are to receive the credit report or the period of time for which the credit report may be released to users of the credit report; and
- (4) payment of a fee, if applicable.



A consumer reporting agency that receives a request from a consumer to lift temporarily a freeze on a credit report shall comply with the request no later than 3 business days after receiving the request. As of September 1, 2008, a consumer reporting agency shall comply with the request within 15 minutes of receiving the request by a secure electronic method or by telephone.

A security freeze does not apply in all circumstances, such as where you have an existing account relationship and a copy of your credit report is requested by your existing creditor or its agents for certain types of account review, collection, fraud control or similar activities; for use in setting or adjusting an insurance rate or claim or insurance underwriting; for certain governmental purposes; and for purposes of pre-screening as defined in the federal Fair Credit Reporting Act.

If you are actively seeking a new credit, loan, utility, telephone or insurance account, you should understand that the procedures involved in lifting a security freeze may slow your own applications for credit. You should plan ahead and lift a freeze, either completely if you are shopping around or specifically for a certain creditor, with enough advance notice before you apply for new credit for the lifting to take effect. You should contact a consumer reporting agency and request it to lift the freeze at least 3 business days before applying. As of September 1, 2008, if you contact a consumer reporting agency by a secure electronic method or by telephone, the consumer reporting agency should lift the freeze within 15 minutes. You have a right to bring a civil action against a consumer reporting agency that violates your rights under the Fair Credit Reporting and Identity Security Act".

### **For Residents of New York**

You can obtain information from the New York State Office of the Attorney General about how to protect yourself from identity theft and tips on how to protect your online privacy. You can contact the New York State Office of the attorney General at:

Office of the Attorney General The Capitol Albany NY 1222-0341 1-800-771-7755 1-800-788-9898 <a href="https://ag.ny.gov/">https://ag.ny.gov/</a>	Bureau of Internet and Technology (BIT) 28 Liberty Street New York, NY 10005 Phone: 212-416-8433 <a href="https://ag.ny.gov/internet/resource-center">https://ag.ny.gov/internet/resource-center</a>
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### **For Residents of North Carolina**

You may also obtain information about preventing and avoiding identity theft from:

North Carolina Attorney General's Office, Consumer Protection Division  
9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, [www.ncdoj.gov](http://www.ncdoj.gov)

### **For Residents of Oregon**

State laws advise you to report any suspected identity theft to law enforcement, as well as the Federal Trade Commission. Contact information for the Oregon Department of Justice is as follows:

Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301, 1-503-378-4320, [www.doj.state.or.us](http://www.doj.state.or.us)