

**The Union Labor Life
Insurance Company**

8403 Colesville Road
Silver Spring, MD 20910
202.682.0900

A Ullico Inc. Company

September 9, 2019

Bob Ferguson
1125 Washington St SE
PO Box 40100
Olympia, WA 98504

Sent via email: SecurityBreach@atg.wa.gov

RE: The Union Labor Life Insurance Company data breach

Dear Attorney General Ferguson:

We are writing to notify you of a data security breach. On April 1, 2019, the email account of an employee of The Union Labor Life Insurance Company (the "Company") was accessed by an unknown, unauthorized user. The employee received an email from a trusted, external business associate that included a login to what appeared to be a legitimate file sharing site. After the employee entered login credentials and approved a multi-factor authentication call, the unauthorized user gained access to contact information in the employees Outlook email. A series of similar spam emails were then sent from the employee's company Outlook account to the employee's internal and external contacts.

The Company's Information Technology department was notified of the malicious email and within 90 minutes disabled the employee's email account, sequestered the employee's computer from the Company network and purged all instances of the malicious email from its system. A message was sent by the Company to recipients of the malicious emails informing them of the unauthorized access and advising them to delete the email.

It was determined that no emails with sensitive data were sent out from the employee's email address by the unauthorized user after gaining access. However, a forensic review of the emails and attachments in the employee's Outlook mailbox was conducted in case any sensitive data was downloaded or otherwise accessed from the employee's account.

The forensic review of emails in the employee's inbox and archived folders identified emails and attachments that contained one or more of the following: name, address, date of birth, gender, Social Security number, and/or personal health information. A closer review of those emails revealed that the data was submitted by benefit plans in the application or underwriting process for group life insurance and/or medical stop loss coverage with the Company. Because these products ensure the plans, the Company does not have a direct relationship with the individuals and does not have mailing addresses for a significant number of the affected individuals whose information was found in the data that was accessible in the mailbox during the incident.

The Company is in the process of notifying the affected groups and acquiring mailing addresses for affected individuals. As of August 28, 2019, the number of known affected Washington residents was below the reporting threshold of 500 individuals. However, with the receipt of additional addresses from the groups, we are now aware of 615 affected Washington residents. This number may increase as we acquire additional addresses of affected individuals from the groups. The total number of affected individuals countrywide that have been identified at this time is approximately 186,900.

The Company has engaged a third party vendor to satisfy individual notification requirements, staff a call center for questions from affected individuals, and offer 24 months of credit monitoring and identity theft protection at the Company's sole expense. Because we are still acquiring addresses of affected individuals, we are conducting staggered notifications to individuals. To date, 47,162 individual notifications have been sent, including those to the 615 known Washington residents. We anticipate sending at least one additional batch mailing.

We have posted a press release on the Company website and notified major media outlets in the states and regions where affected individuals reside. We will update the Attorney General's Office with further developments as needed.

Please direct all inquiries about this matter to Christopher Noland, Assistant Vice President of Compliance, at 202-962-8933 (telephone), 202-682-6784 (fax), or cnoland@ullico.com (email).

Yours Truly

A handwritten signature in black ink, appearing to read "Chris Noland", written over a horizontal line.

Christopher Noland
Assistant Vice President, Compliance