

Farmer, Margaret (ATG)

From: Sheppard, Ben <BEN.SHEPPARD@SCHWAB.COM>
Sent: Thursday, October 01, 2015 3:15 PM
To: ATG MI ADM Security Breach
Attachments: Sample Participant Notification.docx



Sent via E-mail

October 1, 2015

Office of the Attorney General
1125 Washington Street SE
P.O. Box 40100
Olympia, WA 98504-0100
SecurityBreach@atg.wa.gov

We recently discovered that information about residents of Washington who are retirement plan participants of the Actavis, Inc. 401(k) Plan ("Actavis"), for which Schwab Retirement Plan Services, Inc. ("SRPS") provides record-keeping and other related services, has been inadvertently disclosed to a participant in another retirement plan serviced by SRPS. While SRPS does not believe that the participants' information has been or will be used inappropriately, we are writing to notify you as a precaution.

NATURE OF UNAUTHORIZED ACCESS

On August 25, 2015, a spreadsheet containing participants' Social Security numbers, names, addresses, dates of birth, dates of termination (if applicable), employment statuses, division codes, marital statuses and account balances was accidentally emailed through a secure channel by an SRPS employee to a participant in another retirement plan serviced by SRPS. That person immediately informed her plan sponsor, which in turn contacted SRPS. The plan sponsor in question has confirmed that the email and attachment have been deleted. SRPS began to investigate the incident after being notified on September 3, 2015. While we do not believe that any participant information has been used inappropriately, we are informing you, Actavis and the affected participants as a precautionary measure. A sample participant notice, which will be sent on or about October 2, 2015 is attached for your reference.

NUMBER OF RESIDENTS AFFECTED

52 Washington residents were affected by this incident. Each of these residents is being sent a notification by regular mail.

STEPS BEING TAKEN BY THE COMPANY

SRPS is conducting a thorough review of the incident in order to improve our processes for handling confidential information in our possession. In our notification to participants, we are offering them one year of credit monitoring services at no expense to themselves.

CONTACT INFORMATION

If you have any questions or need additional information, please contact me at the following locations:

Ben Sheppard

Schwab Retirement Plan Services, Inc.

12401 Research Blvd. AUSTINB-02-503

Austin, TX 78759

512-344-3914

ben.sheppard@schwab.com

Sincerely,

Ben Sheppard

Ben Sheppard

Vice President, Schwab Retirement Plan Services, Inc.

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DATE

NAME
STREET ADDRESS
CITY, STATE, ZIP

Dear [INSERT NAME],

I am writing on behalf of Schwab Retirement Plan Services, Inc. ("SRPS"), which provides record-keeping and related services to the XXX. 401(k) Plan in which you are a participant. SRPS recently learned about an incident involving the exposure of your sensitive personal information. While we do not believe there is a risk that your information has been or will be used inappropriately, we sincerely apologize for this incident.

On August 25th, a spreadsheet containing your Social Security number, name, address, date of birth, date of termination (if applicable), employment status, division code, marital status and account balance was accidentally emailed to a participant in another retirement plan serviced by SRPS. That person immediately informed their plan sponsor, who in turn contacted SRPS. The plan sponsor in question has confirmed that the email and attachment have been deleted. While we have no reason to believe that your account information was used inappropriately, we want you to be aware of the incident. If you do suspect unauthorized activity has occurred or have any other questions, please call us immediately at 1-800-724-7526. We also recommend you consider taking the protective steps we describe below in this letter. Additionally, we are evaluating other steps we can take to prevent such incidents in the future.

We would like to offer you a complimentary one-year credit monitoring subscription from Equifax. To subscribe, please complete the enrollment process prior to December 31, 2015 using the unique activation code provided on the enclosed Equifax information sheet.

We take the security of your information very seriously and, again, I sincerely apologize for any inconvenience this incident may cause.

Sincerely,

Ben Sheppard
Vice President, Schwab Retirement Plan Services, Inc.

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We recommend that you remain vigilant for incidents of fraud and consider taking the following steps to further protect your personal information:

- Review your recent and future account statements carefully to ensure all transactions are authorized.
- Check your credit report regularly. You can order a free annual credit report by going to www.annualcreditreport.com or by calling the Annual Credit Report Request Service at 1-877-322-8228.
- If at any time you believe you have been the victim of identity theft, you may wish to contact the three major credit reporting agencies and present them with a valid police report in order to place a free "Fraud Alert" or "Security Freeze" in your credit file. If you have not been a victim of identity theft, a credit reporting agency may charge you up to \$10.00 each to place, temporarily lift, or permanently remove a security freeze. Contact information for these credit reporting agencies is listed below. A fraud alert or security freeze notifies potential lenders to verify your identification before extending credit in your name. You should also report any suspected identity theft to local law enforcement.
- To learn more about protecting yourself from identity theft and to obtain further information about a fraud alert or security freeze, visit the Federal Trade Commission's website at www.ftc.gov/bcp/edu/microsites/idtheft, call the FTC toll-free at 1-877-ID-THEFT (1-877-438-4338) or contact the FTC at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Ave., NW, Washington, DC 20580.

Contact Information for Credit Reporting Agencies:

Equifax 1-877-478-7625 P.O. Box 740241 Atlanta, GA 30374 www.equifax.com	Experian 1-888-397-3742 P.O. Box 2002 Allen, TX 75013 www.experian.com	TransUnion 1-888-909-8872 2 Baldwin Place P.O. Box 1000 Chester, PA 19016
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Other Important Information

For Iowa Residents: You may also report suspected incidents of identity theft to local law enforcement or the Office of the Iowa Attorney General, 1305 E. Walnut Street, Des Moines, IA 50319, 515-281-5164, <http://www.iowaattorneygeneral.org>.

For Maryland Residents: To obtain more information about steps you can take to avoid identity theft, you may contact the Office of the Maryland Attorney General, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us/contact.htm, or the Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Ave. NW, Washington, DC 20580, www.ftc.gov/bcp/menus/business/data.shtm.

For Massachusetts and West Virginia Residents: Applicable law requires that we notify you that you may also place a security freeze on your credit report to prevent potential credit grantors from accessing your credit report without your consent, by sending a written request to each of the national credit reporting agencies listed above. In order to request a security freeze, you will need to provide the following: (1) your full name, with middle initial and any suffixes; (2) your Social Security number and date of birth; (3) proof of your current address, such as a utility or phone bill, as well as a list of your addresses from the prior five years; (4) a legible photocopy of a government-issued identification card; (5) if you have been a victim of identity theft, a copy of any police report, complaint, or other investigative report you may have filed with local law enforcement; and (6) if you are not a victim of identity theft, payment by check, money order, or credit card. Do not send cash. The credit reporting agency may charge a fee of up to \$10 each to place, temporarily lift, or remove a freeze. To lift or remove a freeze, you must send a written request in accordance with the requirements of each credit reporting agency. Please be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for credit, loans, employment, housing, or other services. For more information regarding credit freezes, please contact the credit reporting agencies directly. Under state law, you also have the right to request a copy of any police report filed in connection with this incident.

For North Carolina Residents: To obtain more information about steps you can take to avoid identity theft, you may contact the North Carolina Attorney General's Office, 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM (1-877-566-7226), www.ncdoj.gov/ or the Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Ave. NW, Washington, DC 20580, 1-877-ID-THEFT (1-877-438-4338), www.ftc.gov/bcp/menus/business/data.shtm.

For Oregon Residents: You may also report suspected incidents of identity theft to law enforcement, or to the Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Ave. NW, Washington, DC 20580, www.ftc.gov/bcp/menus/business/data.shtm.

For Vermont Residents: You may learn helpful information about fighting identity theft, placing a security freeze, and obtaining a free copy of your credit report is available on the Vermont Attorney General's website at <http://www.atg.state.vt.us>



Activation Code: **INSERT Credit Monitoring Code**

About the Equifax Credit Watch™ Gold with 3-in-1 Monitoring identity theft protection product

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. Note: You must be over age 18 with a credit file in order to take advantage of the product.

Equifax Credit Watch provides you with the following key features and 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 (available online only)
- One 3-in-1 Credit Report and access to your Equifax Credit Report™
- Up to \$1 million in identity theft insurance¹ 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 Alert² placement with automatic renewal functionality* (available online only)

How to Enroll: You can sign up online or over the phone

To sign up online for **online delivery** go to www.myservices.equifax.com/tri

1. Welcome Page: Enter the Activation Code provided at the top of this page 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, check the box to accept the Terms of Use 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.

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. Activation Code: You will be asked to enter your enrollment code as provided at the top of this 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.

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 fraud alert on your credit file, visit: www.fraudalerts.equifax.com or you may contact 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.

1 - Identity Theft Insurance underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. 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.. This product is not intended for minors (under 18 years of age)

2 - The Automatic Fraud Alert feature made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC