

# ALSTON & BIRD

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June 1, 2018

**CONFIDENTIAL  
VIA EMAIL**

securitybreach@atg.wa.gov

Re: Notice of Security Incident

To the Office of the Attorney General:

I am writing on behalf of our client Transamerica, including Transamerica Life Insurance Company and Transamerica Retirement Solutions, LLC (“Transamerica”), to inform you of a potential security incident that may have involved access to the personal information of 335 Washington residents through the Transamerica Retirement Solutions website. This letter is submitted as an update to our previous notification to your office on February 16, 2018.

An extensive investigation by internal and external data forensics teams, and involving consultation with federal law enforcement, has revealed that unauthorized parties used compromised third-party credentials to log into a Transamerica website and access the online account information of plan participants, potentially including 335 Washington residents. We found no evidence of a compromise of Transamerica’s network and systems. The personal information potentially accessed as a result of this incident included name, address, Social Security number, date of birth, financial account information, and employment details.

Transamerica is also providing informational notices to 2,501 Washington residents out of an abundance of caution, though there was no indication of unauthorized access to these residents’ plan participant accounts.

In response to this incident, Transamerica has arranged for Kroll Information Assurance to provide free credit monitoring services for one year to both the affected individuals and individuals receiving an informational notice. Transamerica has also flagged the affected accounts for special handling to prevent unauthorized access and continues to work to minimize the impact of the incident and enhance the security of the affected accounts.

A copy of the notification being sent to 335 Washington residents by first class mail is attached to this letter.

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If you have any other 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 initial "J" and a long, sweeping underline.

James A. Harvey



**Transamerica Retirement Solutions, LLC**  
440 Mamaroneck Avenue  
Harrison, NY 10528-2418

<<MemberFirstName>> <<MemberMiddleName>> <<MemberLastName>>  
<<Address1>>  
<<Address2>>  
<<City>>, <<State>> <<ZipCode>>

<<Date>> (Format: Month Day, Year)

Plan Name: <<ClientDef1(Plan Name - Multiple lines, break lines between words, no hyphens)>>

Dear <<MemberFirstName>> <<MemberLastName>>,

### **Notice of Data Security Incident**

On behalf of Transamerica<sup>1</sup>, we are writing to inform you of a recent event involving some of your personal information. This letter explains what happened and offers you assistance in protecting against the potential for identity theft.

#### What Happened

We recently discovered unauthorized access to your retirement plan online account information available through the Transamerica Retirement Solutions website that may have occurred between March, 2017 and January, 2018. Please note that most individual accounts were accessed only once or at limited points in time during this time frame. We found no evidence of a compromise of Transamerica's network and systems, but unauthorized parties used compromised third-party user credentials to log into Transamerica systems and access your account information.

#### What Information Was Involved

The affected information may have included your name, address, Social Security number, date of birth, financial account information, and employment details.

#### What We Are Doing

We began an investigation as soon as we learned of the incident, engaged a leading cybersecurity forensics firm, and contacted appropriate law enforcement. We continue to work diligently to minimize the impact of this event and may take additional steps to enhance the security of your account based on our investigation. We have also arranged to offer identity monitoring services at no cost to you for one year.

#### What You Can Do

Your account has been flagged for special handling to prevent unauthorized persons from making changes to or accessing your account information. 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 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. To further assist you, we have arranged with Kroll Information Assurance to provide you with one year of identity monitoring at our expense. If you wish to receive this service, you must enroll by August 30, 2018. For information and instructions on how to enroll, please see the attached Reference Guide. If you choose to enroll, you will need to visit **my.idmonitoringservice.com** and use the following membership number: <<Member ID>>.

<sup>1</sup> Wholly owned subsidiary licensed entities of certain states may include Transamerica Life Insurance Company and Transamerica Financial Life Insurance Company. Securities are offered by Transamerica Investors Securities Corporation (TISC). Transamerica Retirement Solutions is an affiliate of TISC.

We are also providing additional information in the attached Reference Guide about steps you can take to monitor and protect against unauthorized use of your personal information.

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 at 1-833-221-9230 8:00 a.m. to 5:00 p.m. (Central Time) Monday through Friday.

Sincerely,

A handwritten signature in black ink that reads "William A. Noyes". The signature is written in a cursive style with a prominent initial "W".

William A. Noyes

Senior Vice President, Workplace Solutions

## Reference Guide

### **Establish Login Credentials for Your Online Transamerica Retirement Solutions Account**

If you have not done so already, it is important that you establish login credentials for your online Transamerica Retirement Solutions 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 three credit bureaus provide free annual credit reports only through the website, toll-free number or request form.

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 home 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.

### **How to Enroll in Kroll Information Assurance Services**

Your identity monitoring services include Credit Monitoring, Web Watcher, \$1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration.

Visit [my.idmonitoringservice.com](http://my.idmonitoringservice.com) to activate and take advantage of your identity monitoring services.

*You have until August 30, 2018 to activate your identity monitoring services.*

Membership Number: <<Member ID>>

To receive credit services by mail instead of online, please call 1-833-221-9230.

We encourage you to take advantage of these protections and remain vigilant for incidents of fraud and identity theft, including regularly reviewing and monitoring your credit reports and account statements.

### **Contact the U.S. Federal Trade Commission**

If you detect any unauthorized transactions in any of your financial accounts, promptly notify the appropriate payment card company or financial institution. If you detect any incidence of identity theft or fraud, promptly report the matter to your local law enforcement authorities, state Attorney General and the FTC.

You can contact the FTC to learn more about how to protect yourself from becoming a victim of identity theft by using the contact information below:

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

### **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, Georgia 30348	800-525-6285	www.equifax.com
Experian	P.O. Box 2002 Allen, Texas 75013	888-397-3742	www.experian.com
TransUnion	P.O. Box 2000 Chester, PA 19016	800-916-8800	www.transunion.com

### **Security Freezes**

You may 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. In addition, you may incur fees to place, lift and/or remove a security freeze.

Security freeze laws vary from state to state. The cost of placing, temporarily lifting, and removing a security freeze also varies by state, generally \$5 to \$20 per action at each credit reporting company. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit bureau. 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, this information must be provided for him/her 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, please find relevant contact information for the three consumer reporting agencies:

Equifax Security Freeze	P.O. Box 105788 Atlanta, GA 30348	800-685-1111	www.equifax.com
Experian Security Freeze	P.O. Box 9554 Allen, TX 75013	888-397-3742	www.experian.com
TransUnion	P.O. Box 2000 Chester, PA 19016	800-909-8872	www.transunion.com

### **For Residents of Iowa**

You may contact law enforcement or the Iowa Attorney General's office to report suspected incidents of identity theft. The Iowa Attorney General's Office 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 the Maryland Office of the Attorney General:

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 three business days after receiving the request. As of September 1, 2008, a consumer reporting agency shall comply with the request within fifteen 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 prescreening 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 three 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 fifteen 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 North Carolina**

You may also obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office:

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)