

# KING & SPALDING

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May 2, 2018

To: Exhibit A; Distribution List

Re: Notice of Security Incident Affecting SunTrust Banks Inc.

Dear Sir or Madam,

I write on behalf of SunTrust Banks, Inc. ("SunTrust") regarding a security incident that involves the potential theft by a former employee of printed copies of some of our client contact lists including name, address, phone number, age (but not date of birth), certain account balances, and in some instances, email addresses. The contact lists did not include personally identifying information, such as social security numbers, account numbers, PINs, log-ins, passwords, or driver's license numbers. SunTrust is also working with outside experts and coordinating with law enforcement on the matter.

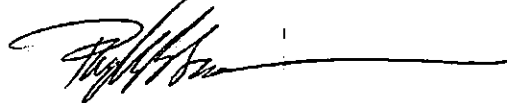
At SunTrust, we care deeply about the privacy and security of the information our clients share with us. In mid-April, we learned of the likelihood that the former employee may have inappropriately printed the client contact information for use outside of SunTrust. Although our investigation into the matter is ongoing, SunTrust is proactively alerting affected clients out of an abundance of caution, as client trust is our priority.

Based on its investigation to date, SunTrust has determined that the incident potentially impacted approximately 1.5 million SunTrust clients who were included in the client contact lists that may have been printed. The approximate number of SunTrust clients in your state who were potentially impacted is identified in Exhibit B. On April 21, 2018, SunTrust started sending security alerts by email (for those clients who have an email on file with SunTrust) and will follow with notification letters via mail to the potentially impacted clients. We have heightened our monitoring of accounts and are offering, at no cost to these clients, an ongoing subscription to Experian IDNotify®, which is a credit monitoring and identity theft detection and resolution service. Unaddressed copies of the letters are attached as Exhibit C. SunTrust also has established a call center to answer clients' questions and a dedicated website to provide information to clients.

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SunTrust remains committed to protecting its clients' personal information and assisting those clients who may have been impacted by this incident. Please do not hesitate to contact me at (404)572-4799 or John Horn at (404)572-2816 if you have any questions regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Phyllis B. Sumner", written over a horizontal line.

Phyllis B. Sumner

Enclosures

**Exhibit A; Distribution List**

<p>Steve Marshall Office of the Alabama Attorney General Office of the Attorney General P.O. Box 300152 Montgomery, AL 36130-0152</p>	<p>Jahna Lindemuth Alaska Attorney General Office 1031 West 4th Avenue, Suite 200 Anchorage, AK 99501 attorney.general@alaska.gov</p>
<p>Mark Brnovich Office of the Arizona Attorney General 1275 West Washington Street Phoenix, AZ 85007-2926</p>	<p>Leslie Rutledge Arkansas Attorney General Office 323 Center Street, Suite 200 Little Rock, AR 72201 oag@ArkansasAG.gov</p>
<p>Xavier Becerra Office of the California Attorney General California Department of Justice P.O. Box 944255 Sacramento, CA 94244-2550</p>	<p>Cynthia H. Coffman Office of the Colorado Attorney General Colorado Department of Law Ralph L. Carr Judicial Building 1300 Broadway, 10th Floor Denver, CO 80203</p>
<p>George Jepsen State of Connecticut Attorney General's Office 55 Elm Street Hartford, CT 06106 ag.breach@ct.gov</p>	<p>Karl A. Racine District of Columbia Attorney General 441 4th Street, NW Washington, DC 20001 dc.oag@dc.gov</p>
<p>Matt Denn Delaware Attorney General Delaware Department of Justice Carvel State Building 820 N. French St. Wilmington, DE 19801 attorney.general@state.de.us</p>	<p>Pam Bondi Office of the Attorney General of Florida State of Florida The Capitol PL-01 Tallahassee, FL 32399-1050</p>
<p>Chris Carr Office of the Georgia Attorney General 40 Capitol Square, SW Atlanta, GA 30334</p>	<p>Russell Suzuki Department of the Attorney General of Hawaii 425 Queen Street Honolulu, HI 96813</p>
<p>Hawaii Office of Consumer Protection Leiopapa A Kamehameha Building aka State Office Tower 235 South Beretania Street Honolulu, Hawaii 96813</p>	<p>Lawrence Wasden State of Idaho Attorney General's Office 700 W Jefferson St., Suite 210 Boise, ID 83720-0010</p>

<p>Lisa Madigan  Illinois Attorney General's Office  100 W. Randolph Street  Chicago, IL 60601  databreach@atg.state.il.us</p>	<p>Curtis T. Hill, Jr.  Indiana Attorney General's Office  Indiana Government Center South  302 W. Washington St., 5th Floor  Indianapolis, IN 46204</p>
<p>Tom Miller  Office of the Attorney General of Iowa  Hoover State Office Bldg.  1305 E. Walnut Street  Des Moines, IA 50319  consumer@iowa.gov</p>	<p>Derek Schmidt  Kansas Attorney General  120 S.W. 10th Ave., 2nd Floor  Topeka, KS 66612-1597</p>
<p>Andy Beshear  Office of the Kentucky Attorney General  700 Capitol Ave, Suite 118  Frankfort, KY 40601-3449</p>	<p>Jeff Landry  Office of the Louisiana Attorney General  P.O. Box 94005  Baton Rouge, LA 70804-4095</p>
<p>Janet T. Mills  Office of the Maine Attorney General  6 State House Station  Augusta, ME 04333</p>	<p>Brian E. Frosh  Office of the Maryland Attorney General  200 St. Paul Place  Baltimore, MD 21202-2202  Idtheft@oag.state.md.us</p>
<p>Maura Healey  Office of the Attorney General of  Massachusetts  One Ashburton Place  Boston, MA 02108-1518</p>	<p>Bill Schuette  Michigan Department of Attorney General  525 W. Ottawa St.  Lansing, MI 48909</p>
<p>Lori Swanson  Office of the Minnesota Attorney General  445 Minnesota Street, Suite 1400  St. Paul, MN 55101-2131</p>	<p>Jim Hood  Mississippi Attorney General's Office  550 High Street  Jackson, MS 39201</p>
<p>Josh Hawley  Missouri Attorney General's Office  Supreme Court Building  207 W. High St.  Jefferson City, MO 65102  attorney.general@ago.mo.gov</p>	<p>Tim Fox  Office of the Montana Attorney General  Justice Building, Third Floor  215 North Sanders  Helena, MT 59620-1401  contactdoj@mt.gov</p>
<p>Montana Office of Consumer Protection  P. O. Box 200151  Helena, MT 59620-0151</p>	<p>Doug Peterson  Nebraska Attorney General's Office  2115 State Capitol  Lincoln, NE 68509</p>

<p>Adam Paul Laxalt Office of the Nevada Attorney General 100 North Carson Street Carson City, NV 89701 AgInfo@ag.nv.gov</p>	<p>Gordon J. MacDonald New Hampshire Department of Justice 33 Capitol Street Concord, NH 03301</p>
<p>Gurbir Grewal Office of the New Jersey Attorney General RJ Hughes Justice Complex 25 Market Street, Box 080 Trenton, NJ 08625-0080 databreach@cyber.nj.gov</p>	<p>Hector Balderas Office of the New Mexico Attorney General 408 Galisteo Street Villagra Building Santa Fe, NM 87501</p>
<p>Eric T. Schneiderman Office of the New York Attorney General The Capitol Albany, NY 12224-0341</p>	<p>Josh Stein North Carolina Attorney General's Office 9001 Mail Service Center Raleigh, NC 27699-9001</p>
<p>Wayne Stenehjem North Dakota Attorney General's Office 600 E. Boulevard Ave. Dept. 125 Bismarck, ND 58505</p>	<p>Mike DeWine Ohio Attorney General's Office 30 E. Broad Street, 14th Floor Columbus, OH 43215</p>
<p>Mike Hunter Oklahoma Office of the Attorney General 313 NE 21st Street Oklahoma City, OK 73105</p>	<p>Ellen F. Rosenblum Office of the Oregon Attorney General Oregon Department of Justice 1162 Court Street, NE Salem, OR 97301-4096</p>
<p>Josh Shapiro Pennsylvania Office of Attorney General 16th Floor, Strawberry Square Harrisburg, PA 17120</p>	<p>Peter F. Kilmartin Office of the Rhode Island Attorney General 150 South Main Street Providence, RI 02903</p>
<p>Alan Wilson Office of the South Carolina Attorney General P.O. Box 11549 Columbia, SC 29211</p>	<p>Consumer Protection Division of the Department of Consumer Affairs P.O. Box 5757 Columbia, SC 29250</p>
<p>Marty J. Jackley South Dakota Attorney General's Office 1302 East Highway 14, Suite 1 Pierre, SD 57501-8501</p>	<p>Herbert H. Slatery, III Office of the Tennessee Attorney General and Reporter P.O. Box 20207 Nashville, TN 37202-0207</p>

<p>Ken Paxton Office of the Texas Attorney General P.O. Box 12548 Austin, TX 78711-2548</p>	<p>Sean D. Reyes Utah Office of the Attorney General Utah State Capitol Complex 350 N. State St., Suite 230 Salt Lake City, UT 84114-2320 uag@agutah.gov</p>
<p>TJ Donovan Vermont Attorney General's Office 109 State Street Montpelier, VT 05609-1001</p>	<p>Mark R. Herring Office of the Virginia Attorney General 202 North Ninth Street Richmond, VA 23219</p>
<p>Bob Ferguson Washington State Office of the Attorney General 1125 Washington St SE Olympia, WA 98504-0100 SecurityBreach@atg.wa.gov</p>	<p>Patrick Morrisey Office of the West Virginia Attorney General State Capitol Complex Bldg. 1, Room E-26 Charleston, WV 25305</p>
<p>Brad Schimel Office of the Wisconsin Attorney General Wisconsin Department of Justice P.O. Box 7857 Madison, WI 53707-7857</p>	<p>Peter K. Michael Wyoming Attorney General's Office Kendrick Building 2320 Capitol Avenue Cheyenne, WY 82002</p>
<p>Puerto Rico Departamento de Asuntos del Consumidor Ave. José De Diego, Pda. 22 Centro Gubernamental Minillas Edificio Torre Norte, Piso 7 San Juan, PR 00940</p>	

**Exhibit B – Approximate Number of Potentially Impacted Residents**

Iowa – Approximately 101

# Exhibit C





SunTrust Bank  
P.O. Box 4418  
Atlanta, GA 30302-4418

<Mail Date>>

«ACCOUNT\_CUS1\_FULL\_NM»  
«ACCOUNT\_ADDR\_LINE1\_DESC»  
«ACCOUNT CITY NM», «ACCOUNT ST CD» «ACCOUNT ZIP CD»

Re: Notice of Security Incident

Dear «CLIENT FIRST\_NAME» «CLIENT LAST\_NAME»:

SunTrust cares deeply about the privacy and security of the information you share with us. We have become aware of potential theft by a former employee of information from some of our client contact lists. Although our investigation into the matter is ongoing, we wanted to alert you out of an abundance of caution that certain information related to you may have been affected. We also are offering, at no cost to you, an ongoing subscription to Experian IDNotify™, a credit monitoring and identity theft detection and resolution service described more fully in the enclosed materials.

The client contact lists at issue are intended for internal use by bank employees for outreach to their clients and include name, address, phone number, age (but not date of birth), email address, and certain account balances. The contact lists **did not include** social security number, account number, PIN, User ID, password, or driver's license number.

Your confidence is at the core of our purpose and we want you to know that we have heightened our monitoring of your accounts and increased other security related measures. While SunTrust continues to monitor accounts for any possible fraudulent transactions, it is important for you to be vigilant about the safety of your personal information. To that end, we have outlined below some additional steps that can be taken for extra protection.

#### **WHAT HAPPENED?**

A former SunTrust employee, while employed at SunTrust, may have printed for unauthorized use outside of SunTrust some of our client contact lists intended for internal use by bank employees for outreach to their clients.

#### **WHAT INFORMATION WAS INVOLVED?**

Although our investigation into the matter is ongoing, the information included in the contact lists that may have been stolen includes name, address, phone number, age (but not date of birth), email address and certain account balances. The contact lists did not include social security number, account number, PIN, User ID, password, or driver's license number.

#### **WHAT WE ARE DOING.**

SunTrust is currently working with outside experts and coordinating with law enforcement on the matter. Additionally, we are continuing to monitor your account activity for possible fraud. We will contact you if we identify potential instances of fraud on any of your SunTrust accounts. While we have not identified significant fraudulent activity, know that SunTrust Bank, Member FDIC. © 2017 SunTrust Banks, Inc. SunTrust is a federally registered service mark of SunTrust Banks, Inc.

you will not be responsible for any fraud on your SunTrust accounts as a result of this incident.

It is very important to SunTrust that we help you take steps to protect your information, so SunTrust is offering, at no cost to you, an ongoing subscription to Experian IDNotify™, which is a credit monitoring and identity theft detection and resolution service. This service will allow you to monitor for issues that might arise involving your personal information. Enrollment details are enclosed, or you can visit [suntrust.com/identity-protection](http://suntrust.com/identity-protection) to learn more and sign up. We are also offering Experian Identity Restoration services. Information on how to take advantage of the Identity Restoration services is also enclosed.

#### **WHAT YOU CAN DO.**

SunTrust recommends that you take advantage of Experian IDNotify™ by following the instructions for enrollment detailed in the enclosed information, or by logging into your online banking account or visiting [suntrust.com/identity-protection](http://suntrust.com/identity-protection).

While we regularly monitor accounts for unusual activity, we suggest that you review your accounts regularly and call us immediately at 1-800-786-8787 (1-800-SUNTRUST) if you see any suspicious activities. Please note that we will never ask you to provide your full account number, PIN number, or Online Banking credentials over the phone, and you should never provide this information to anyone over the phone. We recommend additional steps to best protect your information, which can be found on the Fraud & Security section on [suntrust.com](http://suntrust.com). Please click on the Fraud & Security link at the bottom of the home page for a list of precautions that may be helpful in protecting yourself.

#### **FOR MORE INFORMATION.**

SunTrust understands the importance of protecting the privacy and security of your personal information, and we take our obligations seriously. To learn more or sign up for IDNotify™, please visit [suntrust.com/identity-protection](http://suntrust.com/identity-protection).

We apologize for any inconvenience this may cause you, as your continued trust is critical to us. We appreciate the opportunity to serve you.

Sincerely,



Mark A. Chancy

Vice Chairman

## **Identity Theft Prevention Tips**

We recommend that you remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring your credit reports. You may obtain a free copy of your credit report from each company listed below once every 12 months by requesting your report online at [www.annualcreditreport.com](http://www.annualcreditreport.com), calling toll-free 1-877-322-8228, or mailing an Annual Credit Report Request Form (available at [www.annualcreditreport.com](http://www.annualcreditreport.com)) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase a copy of your credit report by contacting any of the credit reporting agencies below:

Equifax	Experian	TransUnion
PO Box 740241	PO Box 9554	PO Box 2000
Atlanta, GA 30374	Allen, TX 75013	Chester, PA 19016
<a href="http://www.equifax.com">www.equifax.com</a>	<a href="http://www.experian.com">www.experian.com</a>	<a href="http://www.transunion.com">www.transunion.com</a>
888-766-0008	888-397-3742	800-680-7289

If you believe you are the victim of identity theft, you should contact the proper law enforcement authorities, including local law enforcement, and you should consider contacting your state attorney general and/or the Federal Trade Commission ("FTC"). You also may contact the FTC to obtain additional information about avoiding identity theft.

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

**State Attorneys General:** Information on how to contact your state attorney general may be found at [www.naag.org/naag/attorneys-general/whos-my-ag.php](http://www.naag.org/naag/attorneys-general/whos-my-ag.php).

You may obtain information from the FTC and the credit reporting agencies listed above about placing a fraud alert and/or credit freeze on your credit report.

### **IF YOU ARE A MARYLAND RESIDENT**

You may obtain information about avoiding identity theft from the Maryland Attorney General's Office. This office can be reached at:

**Office of the State of Maryland Attorney General**  
200 St. Paul Place  
Baltimore, MD 21202  
1-888-743-0023  
[www.marylandattorneygeneral.gov](http://www.marylandattorneygeneral.gov)

### **IF YOU ARE A NEW MEXICO RESIDENT**

Under New Mexico law, you also have the right to obtain a police report in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it. You may also consider placing a fraud alert message or security freeze on your credit file by calling the toll-free telephone numbers for each of the three national consumer credit reporting agencies listed above. A security freeze prohibits a credit

reporting agency from releasing any information from a consumer's credit report without written authorization. However, 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 new loans, credit, mortgages, employment, housing or other services.

If you have been a victim of identity theft and you provide the credit reporting agency with a valid police report, it cannot charge you to place, lift or remove a security freeze. Alternatively, if you are over the age of 65, then the fee will also be waived. In all other cases, a credit reporting agency may charge you up to \$10.00 each to place, temporarily lift, or permanently remove a security freeze. To place a security freeze on your credit file, you must send a written request to **each** of the three national consumer reporting agencies listed above by regular, certified or overnight mail. In order 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 either 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.

### **IF YOU ARE A NORTH CAROLINA RESIDENT**

You may obtain information about avoiding identity theft from the North Carolina Attorney

General's Office. This office can be reached at:

**North Carolina Attorney General's Office**  
9001 Mail Service Center  
Raleigh, NC 27699-9001  
919-716-6400  
www.ncdoj.gov

**IF YOU ARE A RHODE ISLAND RESIDENT**

You may obtain information about avoiding identity theft from the Rhode Island Attorney General's Office. This office can be reached at:

**Office of the State of Rhode Island Attorney General**  
150 South Main Street  
Providence, RI 02903  
www.riag.ri.gov  
401-274-4400

Under Rhode Island law, you also have the right to obtain a police report in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it. You may also consider placing a fraud alert message or security freeze on your credit file by calling the toll-free telephone numbers for each of the three national consumer credit reporting agencies listed above. A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without written authorization. However, 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 new loans, credit, mortgages, employment, housing or other services.

If you have been a victim of identity theft and you provide the credit reporting agency with a valid police report, it cannot charge you to place, lift or remove a security freeze. Alternatively, if you are over the age of 65, then the fee will also be waived. In all other cases, a credit reporting agency may charge you up to \$10.00 each to place, temporarily lift, or permanently remove a security freeze. To place a security freeze on your credit file, you must send a written request to **each** of the three national consumer reporting agencies listed above by regular, certified or overnight mail. In order 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 either 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.

## **Experian Enrollment Information**

SunTrust has arranged for you to receive a subscription of Experian IDNotify™ at no cost to you. This service includes:

- A personalized Experian credit report at signup;
- Experian Credit Monitoring for indicators of fraud;
- Dark Web monitoring;
- Identity Restoration specialists available for immediate help to address credit and non-credit related fraud; and
- \$1 Million Identity Theft Insurance reimbursement for certain costs associated with a stolen identity event, subject to the terms of the policy.

To enroll in IDNotify™:

- Log into your Online Banking account at [www.suntrust.com](http://www.suntrust.com) and follow the instructions; or
- If you do not have an Online Banking account, please visit <https://www.suntrust.com/identity-protection> and follow the instructions.
- If preferred, SunTrust clients can reach out to our customer service line at 1-800-786-8787 (1-800-SUNTRUST) for more information.
- If you are an international or non-resident client and do not have a U.S. address and do not have a U.S. social security number or tax identification number, please contact SunTrust at 1-877-278-2265 to receive a link and code to enroll.

Please reach out to SunTrust at 1-800-786-8787 (1-800-SUNTRUST) if you see any suspicious activities on your account. If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, we will direct you to an Experian Identity Restoration agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed, then an Experian Identity Restoration agent is available to work with you one-on-one to investigate and resolve each incident of fraud that occurred (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).