2000 Market Street, Suite 2300, Philadelphia, PA 19103
(215) 575-2600 Fax (215) 575-0856

Direct Dial: (215) 575-2615
Email: djshannon@mdwcg.com

January 19, 2024

VIA EMAIL (consumer@ag.iowa.gov)
Consumer Protection Division
Security Breach Notifications
Office of the Attorney General of Iowa
1305 E. Walnut Street
Des Moines, Iowa 50319-0106

Re: First Financial Security, Inc. – Data Incident
Our File No. 41088-00250

Dear Sir or Madam:

We are writing to notify you of a data security incident involving 1101 Iowa residents. We are submitting this notice on behalf of our client, First Financial Security, Inc. ("FFS"). FFS sells life insurance and annuity products to consumers.

Nature Of The Security Breach

On October 17, 2023, FFS was the victim of a ransomware attack which its data protection team discovered was an attempt to access and freeze all of the Information Systems Data. This included both sensitive and non-sensitive data. The ransomware attack was not successful in freezing FFS systems and disrupting operations. With the help of outside IT security experts, FFS determined that a very limited amount of system data was exposed. FSS was able to determine on November 28, 2023 the specific data that was exposed.

Steps Being Taken Related To The Incident

FFS took steps to address this incident promptly after it was discovered, including conducting an investigation to understand what had taken place and how. In addition, FFS took steps to review and enhance the security of its systems. FFS also provided resources to consumers to help protect against potential misuse of personal information.

In addition, FFS is offering identity theft protection services through IDX, the data breach and recovery services expert. IDX identity protection services include: 12 months of credit and CyberScan monitoring, a $1,000,000 insurance reimbursement policy, and fully managed id theft recovery services.

Should you need additional information regarding this matter, kindly contact me.

Very truly yours,

/s/ David J. Shannon

DAVID J. SHANNON

DJS/JJZ

LEGAL/158821770.v1

First Financial Security, Inc.
PO Box 480149
Niles, IL 60714

Enrollment Code: <<XXXXXXXX>>

To Enroll, Scan the QR Code Below:

SCAN ME

Or Visit:
https://app.idx.us/account-creation/protect

<<First Name>> <<Last Name>>
<<Address1>> <<Address2>>
<<City>>, <<State>> <<Zip>>

January 19, 2024

Notice of Data Breach

Dear <<First Name>> <<Last Name>>,

At First Financial Security, Inc. (FFS) we appreciate the trust and faith that you place in us and we take seriously the privacy and confidentiality of the information we hold. If you've ever been a life insurance agent or purchased a life insurance or annuity product, it could have been with FFS or one of our affiliated partners. We are writing to let you know about a data security incident that involves your personal information. This notice explains the incident, the measures that have been taken, and some steps you can take in response. We deeply regret that this incident occurred.

What Happened

On October 17, 2023, FFS was the victim of a ransomware attack which our data protection team discovered was an attempt to access and freeze all of our Information Systems Data. This included both sensitive and non-sensitive data. Thankfully the ransomware attack was not successful in freezing our systems and disrupting our operations. With the help of outside IT security experts, we have determined that a very limited amount of system data was exposed. We were able to determine on November 28, 2023, the specific data that was exposed.

What Information Was Involved

We are providing you this notification in an abundance of caution in case someone actually viewed or had access to your information that would have included your full name, personal information, social security number.

What We Are Doing

We took steps to address this incident promptly after it was discovered, including conducting an investigation to understand what had taken place and how. We continue to monitor our systems for further signs of activity or compromises. In addition, we have taken steps to review and enhance the security of our systems. We are also providing resources, explained in this letter, to help protect against potential misuse of your personal information.

We have secured the services of IDX, A ZeroFox Company and data breach and recovery services expert, to provide call center services and to provide identity monitoring at no cost to you. IDX identity protection services include: <<12 / 24>> months of credit and CyberScan monitoring, a $1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

What You Can Do

We encourage you to contact IDX with any questions and to enroll in the free identity protection services by calling 1-888-927-7176, going to https://app.idx.us/account-creation/protect, or scanning the QR image and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 9 am - 9 pm Eastern Time. Please note the deadline to enroll is April 19, 2024.

Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take full advantage of this service offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

For More Information

You will find detailed instructions for enrollment on the enclosed Recommended Steps document. Also, you will need to reference the enrollment code at the top of this letter when calling or enrolling online, so please do not discard this letter.

Please call 1-888-927-7176 or go to https://app.idx.us/account-creation/protect for assistance or for any additional questions you may have.

We sincerely apologize and regret that this situation may have impacted you. FFS is committed to providing quality services, including protecting your personal information, and we want to assure you that we have policies and procedures to protect your privacy.

Sincerely,

Trent Asher
Chief Information Officer
First Financial Security, Inc.

(Enclosure)

Recommended Steps to Help Protect Your Information

1. **Website and Enrollment.** Scan the QR image or go to https://app.idx.us/account-creation/protect and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter.

2. Activate the credit monitoring provided as part of your IDX identity protection membership. The monitoring included in the membership must be activated to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, IDX will be able to assist you.

3. Telephone. Contact IDX at 1-888-927-7176 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

4. Review your credit reports. We recommend that you remain vigilant by reviewing account statements and monitoring credit reports. Under federal law, you also are entitled every 12 months to one free copy of your credit report from each of the three major credit reporting companies. To obtain a free annual credit report, go to www.annualcreditreport.com or call 1-877-322-8228. You may wish to stagger your requests so that you receive a free report by one of the three credit bureaus every four months.

If you discover any suspicious items and have enrolled in IDX identity protection, notify them immediately by calling or by logging into the IDX website and filing a request for help.

If you file a request for help or report suspicious activity, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

You should also know that you have the right to file a police report if you ever experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that you have been a victim. A police report is often required to dispute fraudulent items. You can report suspected incidents of identity theft to local law enforcement or to the Attorney General.

5. Place Fraud Alerts with the three credit bureaus. If you choose to place a fraud alert, we recommend you do this after activating your credit monitoring. You can place a fraud alert at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. The contact information for all three bureaus is as follows:

Credit Bureaus

Equifax Fraud Reporting	Experian Fraud Reporting	TransUnion Fraud Reporting
1-866-349-5191	1-888-397-3742	1-800-680-7289
P.O. Box 105069	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30348-5069	Allen, TX 75013	Chester, PA 19022-2000
www.equifax.com	www.experian.com	www.transunion.com

It is necessary to contact only ONE of these bureaus and use only ONE of these methods. As soon as one of the three bureaus confirms your fraud alert, the others are notified to place alerts on their records as well. You will receive confirmation letters in the mail and will then be able to order all three credit reports, free of charge, for your review. An initial fraud alert will last for one year.

Please Note: No one is allowed to place a fraud alert on your credit report except you.

6. Security Freeze. By placing a security freeze, someone who fraudulently acquires your personal identifying information will not be able to use that information to open new accounts or borrow money in your name. You will need to contact the three national credit reporting bureaus listed above to place the freeze. Keep in mind that when you place the freeze, you will not be able to borrow money, obtain instant credit, or get a new credit card until you temporarily lift or permanently remove the freeze. There is no cost to freeze or unfreeze your credit files.

7. You can obtain additional information about the steps you can take to avoid identity theft from the following agencies. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them.

California Residents: Visit the California Office of Privacy Protection (www.oag.ca.gov/privacy) for additional information on protection against identity theft. Office of the Attorney General of California, 1300 I Street, Sacramento, CA 95814, Telephone: 1-800-952-5225.

Kentucky Residents: Office of the Attorney General of Kentucky, 700 Capitol Avenue, Suite 118 Frankfort, Kentucky 40601**,** www.ag.ky.gov, Telephone: 1-502-696-5300.

Maryland Residents: Office of the Attorney General of Maryland**,** Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202**,** www.oag.state.md.us/Consumer, Telephone: 1-888-743-0023.

New Mexico Residents: You have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from a violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active-duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. You can review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

New York Residents: the Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; https://ag.ny.gov/.

North Carolina Residents: Office of the Attorney General of North Carolina**,** 9001 Mail Service Center Raleigh, NC 27699-9001, www.ncdoj.gov, Telephone: 1-919-716-6400.

Oregon Residents: Oregon Department of Justice, 1162 Court Street NE, Salem, OR 97301-4096, www.doj.state.or.us/, Telephone: 1-877-877-9392

Rhode Island Residents: Office of the Attorney General, 150 South Main Street, Providence, Rhode Island 02903, www.riag.ri.gov, Telephone: 1-401-274-4400. The total number of notified Rhode Island residents is <<X>>.

For Connecticut residents: You may contact the Connecticut Office of the Attorney General, 165 Capitol Avenue, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag.

For Massachusetts residents: You may contact the Office of the Massachusetts Attorney General, 1 Ashburton Place, Boston, MA 02108, 1-617-727-8400, www.mass.gov/ago/contact-us.html.

Reporting of identity theft and obtaining a police report.

For Iowa residents: You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

For Massachusetts residents: You have the right to obtain a police report if you are a victim of identity theft.

For Oregon residents: You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.

For District of Columbia residents: You may contact the Office of the DC Attorney General, 400 6th St NW Washington, D.C. 20001, 1-202-727-3400, www.oag.dc.gov.

All US Residents: Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW Washington, DC 20580, https://consumer.ftc.gov, 1-877-IDTHEFT (438-4338), TTY: 1-866-653-4261.