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February 29, 2024

Office of the Attorney General
Hoover Building
1305 E. Walnut St
Des Moines, IA 50319
consumer@ag.iowa.gov

To Whom It May Concern:

On behalf of The Northwestern Mutual Life Insurance Company ("NM"), and pursuant to Iowa Code Ann. § 715C.2(8), this letter provides notice of a cybersecurity incident potentially impacting data maintained by Infosys McCamish Systems, LLC ("IMS") a subsidiary of Infosys BPM Limited (a wholly owned subsidiary of Infosys Limited). IMS hosts a secure portal for NM that is used for obtaining life insurance policy value information primarily for Corporate and Bank owned life insurance policies.

On Monday, February 5, 2024 NM compiled a listing of names and addresses of individuals whose information may have been impacted by a cybersecurity event involving an unauthorized third-party's access of IMS systems. However, at this time, IMS has not yet confirmed whether any personal information (including of NM clients) was impacted in the incident. IMS's investigation is ongoing, and NM is proactively monitoring and prepared to respond as new information from IMS becomes available to us.

While Northwestern Mutual has not received confirmation whether personal information of NM clients was impacted in the IMS security incident, IMS has offered, and we have agreed, that proactive notification, along with an offer of free credit monitoring, will be sent to potentially impacted individuals while IMS's investigation is ongoing. We have requested more information from IMS about the nature, extent and impact of the incident, including the details about any impacted individuals (NM clients) data. IMS and their third-party eDiscovery firm continue to investigate to determine if any personal information, personal data, and/or information of NM clients (including the number of affected individuals and type of information) may have been impacted.

It is also our understanding that, in response to the security incident, IMS promptly retained a third-party forensic firm, to investigate and assist with IMS's recovery plan. Based on the information received from IMS, Northwestern Mutual has identified 1,621 Iowa residents whose personal information may have been stored on the relevant IMS systems, and whose personal information was potentially impacted by this incident. The types of information stored on the system may have included the following types of information: name, address, date of birth, and SSN. We are not aware of any resulting identity theft, fraud, or financial losses to potentially impacted individuals.

IMS anticipates sending these individuals formal, proactive notice that their information may have been compromised March 1, 2024, via U.S. Mail, and is expected to be complete on or about March 4, 2024. A sample of the notification letter is enclosed. As stated in the attached sample notice, IMS is offering to

provide individuals 24 months of free identity theft and credit monitoring services through Kroll. In the event compromise of personal information is confirmed, IMS has agreed to send a supplemental notice letter to all impacted individuals. IMS will also maintain call center support to respond to individuals' questions, as will Northwestern Mutual.

As noted above, IMS's investigation of the incident is ongoing. We are proactively monitoring and prepared to respond as new information from IMS becomes available to us.

Northwestern Mutual takes the protection of personal information of all of its stakeholders seriously and is committed to answering any questions that you may have. Please do not hesitate to contact me at 414-665-6263 or stephaniecrites@northwesternmutual.com.

Respectfully yours,

Stephanie Crites

Stephanie Crites

Enclosures

<<b2b_text_1 (Date [Format: Month Day, Year])>>

<<first_name>> <<middle_name>> <<last_name>> <<suffix>>
<<address_1>>
<<address_2>>
<<city>>, <<state_province>> <<postal_code>>
<<country>>

Re: Security Incident - Credit Monitoring

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

Northwestern Mutual is writing to inform you of a cybersecurity incident that occurred at Infosys McCamish Systems LLC ("IMS"), one of the service providers who supports our corporate and business market operations. While IMS has not yet confirmed whether your information was impacted by this incident, out of an abundance of caution, we are notifying you about its occurrence and providing tools to help you protect against possible identity theft or fraud.

What Happened: On or around November 2, 2023, IMS's systems were impacted by a cybersecurity incident in which an unauthorized party gained access to their systems. IMS immediately disabled their systems and retained a third-party forensics firm to investigate and assist with IMS's recovery plan. IMS has restored services to their systems with additional security controls and have found no evidence of continued threat actor access in IMS's environment.

IMS also retained a third-party e-discovery firm to investigate potential impact to consumer data, if any.

Please note: Northwestern Mutual's internal systems were not compromised by the IMS cybersecurity incident. No data was accessed or exfiltrated from systems maintained by NM, and the incident at IMS caused no material disruption to NM's operations.

What Information Was Involved: IMS's e-discovery firm is currently conducting a review of potentially impacted data to determine whether your personal information was impacted. This review remains ongoing. You will be notified if IMS determines that your personal information was impacted.

What We Are Doing: Although IMS has not confirmed that any of your data was impacted as a result of this incident at IMS and neither IMS nor Northwestern Mutual are of aware of any misuse involving your information, we are notifying you that IMS will provide a **complimentary** two-year membership in an identity monitoring service. **You will not be billed for this service.** This service will provide you with daily monitoring of your credit reports, internet surveillance, and resolution of identity theft. **This service will expire at the conclusion of the complimentary period and will not automatically renew**. To activate, visit https://enroll.krollmonitoring.com and take advantage of your identity monitoring services. You have until <<b2b_text_6 (activation date)>> to activate your identity monitoring services. You will need **the activation code and engagement number provided below to complete activation.**

Visit https://enroll.krollmonitoring.com to activate and take advantage of your identity monitoring services.

You have until <<b2b_text_6 (activation date)>> to activate your identity monitoring services.

Membership Number: **<<Membership Number s_n>>**

What You Can Do: We recommend you take the following steps to help protect your personal information:

- Promptly review your credit reports and account statements over the next 24 months and notify your financial institution of any unauthorized transactions or incidents of suspected identity theft.
- Activate in the complimentary identity monitoring service offered above.

We also recommend that you review the additional information about ways to help protect your identity or any additional rights you have depending on your jurisdiction, both provided in **Attachment A**.

For More Information: Should you have any questions regarding this incident, please contact IMS' dedicated call center by dialing at (866) 992-9742, Monday – Friday between 8am – 5:30pm CT, excluding U.S. holidays.

We regret any concern or inconvenience this incident at IMS may have caused you.

Sincerely,

JoAnne Breese-Jaeck
Chief Privacy Officer
Northwestern Mutual

ENC: Attachment A: Additional Information on Helping to Protect Your Information and State Law Information

Attachment A: Additional Information on Helping to Protect Your Information and State Law Information

Monitor Your Accounts

You may obtain a free copy of your credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at 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 one or more of the three national credit reporting agencies listed below.

Equifax®	**Experian**	**TransUnion®**
P.O. Box 740241	P.O. Box 9701	P.O. Box 1000
Atlanta, GA 30374-0241	Allen, TX 75013-9701	Chester, PA 19016-1000
1-800-685-1111	1-888-397-3742	1-800-888-4213
www.equifax.com	www.experian.com	www.transunion.com

When you receive your credit reports, review them carefully. Look for accounts or creditor inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number, that is not accurate. If you see anything you do not understand, call the credit reporting agency at the telephone number on the report.

Credit Freeze

You 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 Personal Identification Number (PIN) that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential creditors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to access your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. Should you wish to place a credit freeze, please contact all three major consumer reporting agencies identified above.

You must separately place a credit freeze on your credit file at each credit reporting agency. The following information should be included when requesting a credit freeze: Full name, with middle initial and any suffixes; Social Security number; date of birth (month, day, and year); current address and previous addresses for the past five (5) years; proof of current address, such as a current utility bill or telephone bill; and other personal information as required by the applicable credit reporting agency. If you request a credit freeze online or by phone, the credit reporting agencies have one (1) business day after receiving your request to place a credit freeze on your credit file. If you request a lift of the credit freeze online or by phone, the credit reporting agency must lift the freeze within one (1) hour. If you request a credit freeze or lift of a credit freeze by mail, the credit reporting agency must place or lift the credit freeze no later than three (3) business days after getting your request.

Fraud Alerts

You also have the right to place an initial or extended fraud alert on your credit file at no cost. An initial fraud alert lasts 1-year. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which lasts 7 years. Should you wish to place a fraud alert, please contact any one of the major consumer reporting agencies listed above. The agency you contact will then contact the other two credit agencies.

Additional Information

You can further educate yourself regarding identity theft and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC. **The Federal Trade Commission**: 600 Pennsylvania Avenue, NW Washington, DC 20580. 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261; and www.ftc.gov/idtheft.

For residents of the *District of Columbia, Iowa, Maryland, New York, North Carolina, Oregon and Rhode Island*

You may contact your Attorney General for additional information about avoiding identity theft. If you are a Rhode Island resident, you may also file a police report by contacting local or state law enforcement agencies. You may use the following information to contact your attorney general:

Office of the Attorney General Office of Consumer Protection 400 6th Street, NW Washington, DC 20001 (202) 442-9828 www.oag.dc.gov	Office of the Iowa Attorney General Hoover State Office Building 1305 E. Walnut Street Des Moines, IA 50319 (515) 281-5926 / (888) 777-4590 www.iowaattorneygeneral.gov	Maryland Office of the Attorney General Consumer Protection Division 200 St. Paul Place Baltimore, MD 21202 (410) 528-8662 www.marylandattorneygeneral.gov	Oregon Department of Justice 1162 Court Street NE Salem, OR 97301-4096 (877) 877-9392 www.doj.state.or.us
New York Attorney General Consumer Frauds & Protection Bureau 120 Broadway, 3rd Floor New York, NY 10271 (800) 771-7755 www.ag.ny.gov	New York Department of State Division of Consumer Protection 99 Washington Avenue Suite 650 Albany, New York 12231 (800) 697-1220 www.dos.ny.gov	North Carolina Department of Justice 9001 Mail Service Center Raleigh, NC 27699-9001 (919) 716-6000 www.ncdoj.g;ov	Rhode Island Office of the Attorney General Consumer Protection Division 150 South Main Street Providence, RI 02903 (401) 274-4400 www.riag.ri.gov

For residents of *Kentucky*: The Kentucky Attorney General – Office of Consumer Protection may be contacted at: 1024 Capital Center Drive, Suite 200, Frankfort, Kentucky 40601; 1-800-804-7556; and https://www.ag.ky.gov/Resources/Consumer-Resources/Consumers/Pages/Identity-Theft.aspx.

For residents of *Massachusetts*: Under Massachusetts law, you have the right to obtain any police report filed in connection to the 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.

For residents of *New Mexico*: You have rights under the federal Fair Credit Reporting Act (FCRA). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit https://files.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.

KROLL

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll: Credit Monitoring, Web Watcher, $1 Million Identity Fraud Loss Reimbursement, Fraud Consultation, and Identity Theft Restoration

Single Bureau Credit Monitoring

You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.

Web Watcher

Web Watcher monitors internet sites where criminals may buy, sell, and trade personal identity information. An alert will be generated if evidence of your personal identity information is found.

$1 Million Identity Fraud Loss Reimbursement

Reimburses you for out-of-pocket expenses totaling up to $1 million in covered legal costs and expenses for any one stolen identity event. All coverage is subject to the conditions and exclusions in the policy.

Fraud Consultation

You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Theft Restoration

If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.