J.P.Morgan

JPMorgan Chase Bank, N.A.
Corporate Headquarters
383 Madison Avenue
New York, NY 10179-001

May 6, 2024

Via email to 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

Re: Notice of Data Security Incident in J.P. Morgan Benefit Payment Services

Dear Attorney General Brenna Bird:

We are writing to inform you of a data security incident involving access to personal information of 3,048 residents of Iowa.

On February 26, 2024, we became aware that an individual, acting on behalf of a client who uses our benefit payment services, was able to access personal information relating to our arrangements with other clients. Our investigation identified two other instances where an individual acting on behalf of one client accessed personal information relating to other clients. The root cause of this access has been identified as a software issue in a system that supports our benefit payment services.

The three individuals downloaded a total of twelve reports, between August 26, 2021 and February 23, 2024, that included the names, social security numbers, mailing addresses, payment and deduction amounts, payment method (e.g., direct deposit), and in some instances, bank routing and account numbers of residents. We promptly updated the system's access controls and tested and applied a software update. We further confirmed that the three individuals did not have the ability to modify records of residents. The employers of all three individuals confirmed deletion of the reports from active drives and are monitoring backup files for any potential restoration of the personal information where deletion from backup files was not possible.

We notified residents of this incident by letter mailed on April 18, 2024 and offered two years of free credit monitoring. A sample of our notice is attached.

If you have any questions, you may reach me at data.privacy@jpmorgan.com or 201-595-8683.

Sincerely,

Theresa M. Henry

Theresa M. Henry
Executive Director
545 Washington Blvd, Floor 04
Jersey City, NJ 07310
Tel: 201-595-8683
Email: data.privacy@jpmorgan.com

Enclosed: Sample Copy of Resident Notification Letter with Credit Monitoring

J.P. Morgan
PO BOX 6300
Newark, DE 19714-6300

LetterDate

FullName1
Address1
Address2
Address3
AddressCity, AddressState AddressZip

Notice of Data Breach: Consider taking steps to protect your information

Dear {{Salutation1}}:

J.P. Morgan is the benefit payments agent for {{PlanClientName}}. We take the security of your information seriously and want to let you know about an incident related to your personal and financial information.

Here's what happened and what information was involved

- On February 26, 2024, we learned of a software issue that caused certain reports run by three authorized system users to include plan participant information that they were not entitled to see, including yours.
- The three users were employed by J.P. Morgan customers or their agents.
- The system users ran a limited number of reports between August 26, 2021 and February 23, 2024.
- The reports included your name, address, Social Security number, payment and deduction amounts, as well as bank routing and account number if you set up direct deposit.

What we are doing

- We promptly addressed the access issue and have applied a software update.

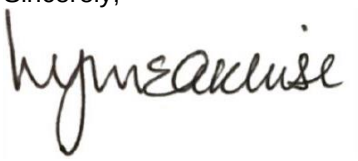
What you can do

- It is always a good practice to regularly review your accounts and monthly statements. If you identify any transactions you do not recognize, call the number on your statement or the back of your credit or debit card.
- You may consider placing a security freeze on your credit report(s).
- While we have no indication that your information has been misused, we suggest that you accept the attached offer of two years of free credit monitoring through Experian's® IdentityWorks®. This helps alert you to changes to your credit bureau information.
- Please see the enclosed important information describing the benefits, how to enroll and the additional steps you can take to help protect yourself.

For more information

- If you have questions, please call us at 1-888-719-8932 (option #4). Representatives are available M-F 8:30am to 5pm EST. When you call, please reference PRI-12526413.

Sincerely,



Lynne Atchison
Executive Director
Benefit Payment Services

Enclosed: Experian's® IdentityWorks® Enrollment Information
Additional Steps to Help Protect Yourself document

JPMorgan Chase Bank, N.A. Member FDIC

Experian's® IdentityWorks® Enrollment Information

To help protect your identity, J.P. Morgan is offering a complimentary membership of Experian's® IdentityWorks®. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks® Now in Three Easy Steps

1. **Ensure** that you enroll by: {{enrollmentdate}} (Your code will not work after this date.)
2. **Visit** the IdentityWorks® website to enroll: www.experianidworks.com/3bcredit
3. **Provide** your activation code: {{code}}

If you have questions or need an alternative to enrolling online, please call 833-931-5665 and provide engagement number: {{engagementnumber}}

Additional details regarding your IdentityWorks® membership

- A credit card is not required for enrollment.
- Once your IdentityWorks® membership is activated, you will receive the following features:
    - Free copy of your Experian® credit report
    - **Surveillance Alerts for Daily Bureau Credit Monitoring:** Alerts of key changes and suspicious activity found on your Experian®, Equifax® and TransUnion® credit reports
    - **Identity Theft Resolution and IdentityWorks® ExtendCARE™:** Toll-free access to US-based customer care and a dedicated Identity Theft Resolution agent who will walk you through the process of fraud resolution from start to finish for seamless service. They will investigate each incident; help with contacting credit grantors to dispute charges and close accounts including credit, debit and medical insurance cards; assist with freezing credit files; and contact government agencies.
        - It is recognized that identity theft can happen months and even years after a data breach. To offer added protection, you will receive ExtendCARE™, which provides you with the same high-level of Fraud Resolution support even after your IdentityWorks® membership has expired.
    - **$1 Million Identity Theft Insurance[1]**: Immediately covers certain costs including lost wages, private investigator fees, and unauthorized electronic fund transfers.

Once your enrollment in IdentityWorks® is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about IdentityWorks®, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's® customer care team at 877-890-9332.

[1]Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). 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.

You Can Take Additional Steps to Help Protect Yourself

Place a one-year fraud alert on your credit file
An **initial one-year fraud alert** tells anyone requesting your credit file that you might be at risk for fraud. A lender should verify that you have authorized any request to open a credit account in your name, increase the credit limit and/or get a new card on an existing account. If the lender can't verify this, they shouldn't process the request.

Contact any one of the credit reporting agencies to set up an initial one-year fraud alert.

Equifax	**Experian**	**TransUnion**
PO Box 105069	PO Box 9554	PO Box 2000
Atlanta, GA 30348	Allen, TX 75013	Chester, PA 19016
1-800-525-6285	1-888-397-3742	1-800-680-7289
equifax.com	experian.com	transunion.com

Place a security freeze on your credit file
A **security freeze** on your credit file prevents anyone from accessing your credit report and therefore from issuing credit in your name. **However, placing a security freeze also may delay, interfere with, or prevent the timely approval of any requests <u>you</u> make for new loans, credit, mortgages, employment, housing or other services.**

Contact all three of the credit reporting agencies above to set up a security freeze with each of them.

Order your free annual credit reports
Visit annualcreditreport.com or call 1-877-322-8228 to get a free copy of your credit reports. Once you receive them:

- Verify that all information is correct.
- Look for discrepancies such as accounts you didn't open or creditor inquiries you didn't authorize.
- Contact the credit reporting agency if you notice incorrect information or have questions.

Manage your personal information

- Carry only essential documents with you.
- Be cautious about sharing your personal information with anyone else.
- Shred receipts, statements, and other documents containing sensitive information.
- Use anti-virus software on your computer and keep it updated.

Use tools to monitor your credit and financial accounts

- We suggest that you carefully review your credit reports and bank, credit card and other account information for any transaction you don't recognize.
- Create alerts with your credit card company and bank to notify you of activity.
- File an identity-theft report with your local police and contact the credit reporting agency that issued the report if you find unauthorized or suspicious activity on your credit report.

Get more information about identity theft and ways to protect yourself

- Visit experian.com/blogs/ask-experian/category/credit-advice/fraud-and-identity-theft/
- Call the Federal Trade Commission (FTC) identity theft hotline at 1-877-438-4338 (TTY: 1-866-653-4261) or visit IdentityTheft.gov

U.S. State Notification Requirements

For residents of *California, Hawaii, Illinois, Iowa, Maryland, Michigan, Missouri, New Mexico, North Carolina, Oregon, Vermont, Virginia, West Virginia,* and *Wyoming*:

It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing financial account statements carefully and monitoring your credit report for unauthorized activity. You may request your free annual credit report, whether or not you suspect any unauthorized activity on your account, by visiting www.AnnualCreditReport.com or calling 1-877-FACTACT (1-877-322-8228). You may also obtain a free copy of your credit report by contacting any one or more of the national consumer reporting agencies listed below. They can also provide you with information about fraud alerts and security freezes.

Equifax
PO Box 740241
Atlanta, GA 30374
1-866-349-5191
equifax.com

Experian
PO Box 2002
Allen, TX 75013
1-888-397-3742
experian.com

TransUnion
PO Box 1000
Chester, PA 19016
1-800-888-4213
transunion.com

For residents of *Iowa*:

State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of *Oregon*:

State laws advise you to report any suspected identity theft to law enforcement, as well as the Attorney General and the Federal Trade Commission.

For residents of *District of Columbia, Illinois, Maryland, New York, North Carolina, and Rhode Island*:

State laws require us to tell you that you can obtain information from the Federal Trade Commission about steps you can take to avoid identity theft (including how to place a fraud alert or security freeze). If you are a District of Columbia, Maryland, New York, North Carolina or Rhode Island resident, you may also be able to obtain this information from your state's Attorney General.

MD Attorney General's Office
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
oag.state.md.us

NC Attorney General's Office
Consumer Protection Division
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-566-7226
ncdoj.gov/

Federal Trade Commission
Consumer Response Center
600 Pennsylvania Avenue, NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)
ftc.gov/bcp/edu/microsites/idtheft/

RI Attorney General's Office
Consumer Protection Division
150 South Main Street
Providence, RI 02903
1-401-274-4400
riag.ri.gov

NY Attorney General's Office
Bureau of Internet and Technology
28 Liberty Street
New York, NY 10005
1-212-416-8433
ag.ny.gov/internet/resource-center

DC Attorney General's Office
Consumer Protection
441 4th Street, NW
Washington, DC 20001
1-202-727-3400
oag.dc.gov/consumer-protection/consumer-alert-identity-theft

For residents of *Connecticut, District of Columbia, New Mexico, Rhode Island,* and *West Virginia*:

You have the right to place a security freeze on your credit report. This prohibits a credit reporting agency from releasing any information about your credit report without your written authorization. However, placing a security freeze also may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit, mortgages, employment, housing or other services. You can place a security freeze on your credit report free of charge.

If you are the victim of identity theft, you have the right to file a police report and obtain a copy. For instructions on how to place a security freeze, visit the websites of all three major credit reporting agencies, call or write them.

When requesting a security freeze, you may need to include the following:

- Your full name, with middle initial as well as Jr., Sr., II, etc.
- Social Security number
- Date of birth
- Current address and all addresses for the past two years
- Proof of current address such as a current utility bill or telephone bill
- Legible copy of a government-issued identification card, such as a state driver's license, state identification card, or military identification

Equifax Security Freeze
PO Box 105788
Atlanta, GA 30348
1-800-349-9960
equifax.com/personal/credit-report-services/

Experian Security Freeze
PO Box 9554
Allen, TX 75013
1-888-397-3742
experian.com/freeze/center.html

TransUnion Security Freeze
PO Box 160
Woodlyn, PA 19094
1-888-909-8872
transunion.com/credit-freeze