

REV JUN 13 2022

## COVINGTON

BEIJING BRUSSELS DUBAI FRANKFURT JOHANNESBURG  
LONDON LOS ANGELES NEW YORK PALO ALTO  
SAN FRANCISCO SEOUL SHANGHAI WASHINGTON

Ashden Fein

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**By Federal Express**

June 10, 2022

Consumer Protection Division  
Security Breach Notifications  
Office of the Attorney General of Iowa  
1305 E. Walnut Street  
Des Moines, Iowa 50319-0106

**Re: Legal Notice of Information Security Breach Pursuant to Iowa Code § 715C.2**

To Whom It May Concern:

In accordance with the above-referenced provision of Iowa law, I write in connection with an information security incident involving a service provider, Aon PLC (“Aon”). Aon serves as Danaher’s and its subsidiaries’ (“Danaher”) insurance broker for health and prescription benefits. Although Aon has previously disclosed this incident,<sup>1</sup> it notified Danaher on May 13, 2022 that certain personal data relating to Danaher’s current and former employees was impacted by this security incident.

Aon initially identified the information security incident on February 25, 2022 and retained cybersecurity firms to conduct a thorough investigation. Aon immediately reported the incident to law enforcement, including the Federal Bureau of Investigation (“FBI”), and continues to work closely with them.

Aon determined the unauthorized third party accessed Aon’s systems at various times between December 29, 2020 and February 25, 2022 and obtained certain documents, including a file containing certain information of Danaher’s current and former employees. Aon reviewed the file and determined that the information included Social Security numbers, email addresses, dates of birth, and information identifying the type of health insurance coverage of individuals. According to Aon, specific health insurance claims were not impacted by this incident. Aon has stated that it has no reason to suspect that the information has or will be misused.

Aon has taken steps to confirm that the third party no longer has access to the data and has no indication the third party copied, retained, or shared any of the data. Aon has also stated that it implemented numerous measures designed to enhance the security of its network, systems, and data, including adopting encryption technologies, strengthening password requirements, implementing new technical safeguards, implementing periodic technical and nontechnical evaluations, and revising policies and procedures, among others. Danaher is working with Aon

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<sup>1</sup> See <https://aon.mediaroom.com/2022-02-28-Regarding-Todays-8-K-Filing>.

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to confirm that the personal information that Danaher provides to Aon is handled properly and protected by the appropriate safeguards, as required by Danaher's agreement with Aon.

Danaher has identified and plans to notify six hundred and thirty-two (632) current or former employees who are residents of Iowa. Enclosed is a copy of the notification letter that will be sent to these individuals via first-class mail on June 13, 2022.

The notification to individuals includes (1) a description of the incident and the type of personal information at issue; (2) the actions taken by Aon to protect personal information from further unauthorized access; (3) an address and a toll-free phone number to call for further information and assistance; (4) information on how the individual may enroll in free credit monitoring and other complimentary services; (5) information about how to place a fraud alert or security freeze on a credit report; (6) the toll-free numbers and addresses for the major consumer reporting agencies; (7) the toll-free number, address, and website for the Federal Trade Commission, and a statement that individuals can obtain information on identity theft from this source; and (8) advice that directs the individual to remain vigilant by reviewing account statements and monitoring free credit reports.

If you have any questions or need further information regarding this incident, please contact me using the above information.

Respectfully submitted,



Ashden Fein  
Partner

Enclosure



Return Mail Processing  
PO Box 999  
Suwanee, GA 30024

81 1 21120 \*\*\*\*\*SNGLP

SAMPLE A. SAMPLE - LV24

APT ABC

123 ANY ST

ANYTOWN, US 12345-6789



June 13, 2022

**RE: Notice of Data Breach**

Dear Sample A. Sample:

Aon PLC (“Aon”), which provides professional services to Danaher and its subsidiaries (“Danaher”), was recently the target of a cyber event that the firm identified impacted a limited number of Aon systems. We have no evidence that any of your personal information has or will be misused, but we wanted to make you aware of the incident, the measures we have taken in response, and to provide details on proactive steps you may consider taking to help protect your information.

***What Happened?***

On February 25, 2022, Aon identified a cyber incident that, upon investigation, impacted a limited number of systems. Once the incident was discovered, Aon immediately retained leading cybersecurity firms to assist in responding and help conduct a thorough investigation of the incident.

The investigation revealed that an unauthorized third party accessed certain Aon systems at various times between December 29, 2020 – February 26, 2022. Findings from the investigation indicate the unauthorized third party temporarily obtained certain documents containing personal information from Aon systems during this period. Aon has taken steps to confirm that the unauthorized third party no longer has access to the data and Aon has no indication the unauthorized third party further copied, retained, or shared any of the data. We have no reason to suspect your information has or will be misused.

***What Information Was Involved?***

Aon reviewed the data that was obtained and determined it contained some of your personal information, including your name and one or more of the following: Social Security number and, in a small number of cases, benefit enrollment information.

***What We Are Doing.***

Aon immediately reported the incident to, and is working closely with, law enforcement authorities, including the FBI. Additionally, to prevent a similar occurrence in the future, we implemented numerous measures designed to enhance the security of our network, systems,

and data. Aon will continue to evaluate additional steps that may be taken to further enhance the firm's security environment.

***What You Can Do.***

Please review the "Information About Identity Theft Protection" reference guide, enclosed here, which describes additional steps you may take to help protect yourself, including recommendations from the Federal Trade Commission regarding identity theft protection and details regarding placing a fraud alert or security freeze on your credit file.

To help protect your identity, we are offering complimentary access to Experian IdentityWorks<sup>SM</sup> for 24 months. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** September 30, 2022 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/credit>
- Provide your **activation code: See home mailing**

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (833) 575-2853 by September 30, 2022. Be prepared to provide engagement number B054477 as proof of eligibility for the Identity Restoration services by Experian.

***For More Information***

The security of your personal information is important to us and we sincerely regret that this incident occurred. For more information, or if you have any questions or need additional information, please call (833) 575-2853, Monday through Friday, between 9 a.m. to 11 p.m. Eastern Time, and Saturday and Sunday from 11 a.m. to 8 p.m. Eastern Time.

Sincerely,



Brad Bryant  
Global Chief Privacy Officer

## ADDITIONAL DETAILS REGARDING YOUR 24-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.\*
- **Credit Monitoring:** Actively monitors Experian file for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance\*\*:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian 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 to investigate and resolve each incident of fraud that occurred from the date of the incident (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). Please note that Identity Restoration is available to you for 24 months from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration).

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary 24-month membership.

\* Offline members will be eligible to call for additional reports quarterly after enrolling.

\*\* The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

## INFORMATION ABOUT IDENTITY THEFT PROTECTION GUIDE

Contact information for the three nationwide credit reporting companies is as follows:

Equifax	Experian	TransUnion
Phone: 1-800-685-1111 P.O. Box 740256 Atlanta, Georgia 30348 www.equifax.com	Phone: 1-888-397-3742 P.O. Box 9554 Allen, Texas 75013 www.experian.com	Phone: 1-888-909-8872 P.O. Box 105281 Atlanta, GA 30348-5281 www.transunion.com

**Free Credit Report.** We remind you to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. If you identify any unauthorized charges on your financial account statements, you should immediately report any such charges to your financial institution. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com) or call toll free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's ("FTC") website at [www.consumer.ftc.gov](http://www.consumer.ftc.gov)) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

**For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents:** You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

**Security Freeze.** Security freezes, also known as credit freezes, restrict access to your credit file, making it harder for identity thieves to open new accounts in your name. You can freeze and unfreeze your credit file for free. You also can get a free freeze for your children who are under 16. And if you are someone's guardian, conservator or have a valid power of attorney, you can get a free freeze for that person, too.

How will these freezes work? Contact all three of the nationwide credit reporting agencies — Equifax, Experian, and TransUnion. If you request a freeze online or by phone, the agency must place the freeze within one business day. If you request a lift of the freeze, the agency must lift it within one hour. If you make your request by mail, the agency must place or lift the freeze within three business days after it gets your request. You also can lift the freeze temporarily without a fee.

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.

**For New Mexico residents:** 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. For more information, including information about additional rights, go to [www.consumerfinance.gov/learnmore](http://www.consumerfinance.gov/learnmore) or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

**Fraud Alerts.** A fraud alert tells businesses that check your credit that they should check with you before opening a new account. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

**Federal Trade Commission and State Attorneys General Offices.** If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your home state. You may also contact these agencies for information on how to prevent or avoid identity theft. You may contact the Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, [www.ftc.gov/bcp/edu/microsites/idtheft/](http://www.ftc.gov/bcp/edu/microsites/idtheft/), 1-877-IDTHEFT (438-4338).

**For Connecticut Residents:** You may contact and obtain information from your state attorney general at: Connecticut Attorney General's Office, 55 Elm Street, Hartford, CT 06106, 1-860-8085318, [www.ct.gov/ag](http://www.ct.gov/ag).

**For District of Columbia Residents:** You may contact the Office of the Attorney General for the District of Columbia, 441 4th Street NW, Suite 1100 South, Washington, D.C. 20001, <https://oag.dc.gov>, 202-442-9828.

**For Maryland Residents:** You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, [www.oag.state.md.us](http://www.oag.state.md.us), 1-888-7430023.

**For New York Residents:** You may contact the New York Department of State Division of Consumer Protection, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and New York State Office of the Attorney General, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>.

**For North Carolina residents:** You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, [www.ncdoj.gov](http://www.ncdoj.gov), 1-877-566-7226.

**For Rhode Island Residents:** You may contact the Rhode Island Office of the Attorney General, 150 South Main Street, Providence, RI 02903, <http://www.riag.ri.gov>, 401-274-4400.

**Reporting of identity theft and obtaining a police report.** You have the right to obtain any police report filed in the United States in regard to this incident. If you are the victim of fraud or identity theft, you also have the right to file 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. You also have a right to file a police report and obtain a copy of it.

**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 Rhode Island residents:** You have the right to file or obtain a police report regarding this incident.