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June 27, 2024

VIA EMAIL

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

RE: Notice of Data Event

Dear Sir or Madam:

We represent Infosys McCamish Systems, LLC ("IMS") and are writing to notify your Office of a compromise that affected the security of certain personal information relating to 54,175 Iowa residents. IMS is a processor and supports corporate and business market operations for certain organizations. By providing this notice, IMS does not waive any rights or defenses, including but not limited to rights or defenses regarding the applicability of Iowa law, the applicability of Iowa data event notification statute, or personal jurisdiction.

Notice of Data Event

On November 2, 2023, IMS became aware that certain IMS systems were encrypted by ransomware (the "Incident"). That same day, IMS launched an investigation with the assistance of leading third-party cybersecurity experts, retained through outside counsel, to undertake a full forensic analysis and determine the nature and extent of the compromise, secure its systems, and identify what information may have been affected and to whom it relates. Additionally, IMS notified law enforcement. Please note that the Incident has since been contained and remediated.

The in-depth cyber forensic investigation determined that unauthorized activity occurred between October 29, 2023, and November 2, 2023. Through the investigation, it was also determined that data was subject to unauthorized access and acquisition. With the assistance of third-party eDiscovery experts, retained through outside counsel, IMS proceeded to conduct a thorough and time-intensive review of the data at issue to identify the personal information subject to unauthorized access and acquisition and determine to whom the personal information relates. IMS has notified its impacted organizations of the Incident and of the compromise of any personal information pertaining to them.

Please also note that as part of its response to this Incident, IMS took steps to implement additional safeguards to further protect the security of its systems.

The information impacted varies by individual but includes some or all of the following: Social Security Number, date of birth, medical treatment/record information, biometric data, email address and password, username and password, Driver's License number or state ID number, financial account information, payment card information, passport number, tribal ID number, and U.S. military ID number.

Notice to Iowa Residents

On June 27, 2024, IMS began providing written notice of the compromise to impacted individuals, which includes Iowa residents. Written notice is being provided in substantially the same form as the letter attached hereto as ***Exhibit A.*** Please note that notification is being provided on behalf of IMS as a data owner and on behalf of impacted organizations that have requested IMS complete this notification on their behalf, as a data collector/third-party agent, as identified in ***Exhibit B.*** IMS also provided substitute notice of the Incident on June 27, 2024.

Other Steps Taken and to be Taken

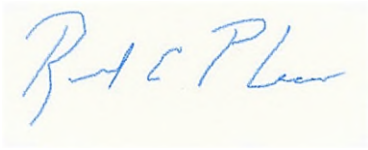
Upon discovery of the Incident, IMS moved quickly to investigate and respond to the Incident, assess the security of its systems, and notify impacted organizations and individuals. IMS also reviewed its existing policies and procedures and implemented additional safeguards to further secure its systems and the information contained therein.

While the comprehensive data review was ongoing, we proactively offered twenty-four (24) months of complimentary credit monitoring to current customers for individuals associated with those customers. Although we are unaware of any instances since the Incident occurred in which the personal information has been fraudulently used, IMS is nevertheless offering impacted individuals complimentary credit monitoring for twenty-four (24) months and dedicated call center services as well as providing guidance on how to protect against identity theft and fraud, including advising individuals to report any suspected identity theft or fraud to their financial institutions. IMS is also providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national credit reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for fraud and identity theft by reviewing account statements and monitoring credit reports, and encouragement to contact the Federal Trade Commission, their Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Contact Information

Should you have any questions regarding this notification or other aspects of the Incident, please contact me at (215) 656-2453.

Very truly yours,



Ron Plesco
Partner

RP

EXHIBIT A

Infosys McCamish Systems, LLC
3225 Cumberland Boulevard SE - Suite 700
Atlanta, GA 30339
Tel: 770 690 1500
www.infosysbpm.com/mccamish.html

<<Date>> (Format: Month Day, Year)

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

Re: **NOTICE OF DATA BREACH**

Dear <<first_name>> <<last_name>>:

Infosys McCamish Systems, LLC ("IMS") writes to inform you of an incident that involved some of your personal information. While we are unaware of any instances since the incident occurred in which the personal information involved has been fraudulently used, we are providing you with information about the incident and steps you can take to protect your personal information, should you feel it necessary to do so.

WHAT HAPPENED? On November 2, 2023, IMS became aware that certain IMS systems were encrypted by ransomware (the "Incident"). That same day, we began an investigation with the assistance of third-party cybersecurity experts, retained through outside counsel, to determine the nature and scope of the activity, assist with containment, and ensure no ongoing unauthorized activity. IMS also promptly notified law enforcement. Please note that the Incident has since been contained and remediated.

The in-depth cyber forensic investigation determined that unauthorized activity occurred between October 29, 2023, and November 2, 2023. Through the investigation, it was also determined that data was subject to unauthorized access and acquisition. With the assistance of third-party eDiscovery experts, retained through outside counsel, IMS proceeded to conduct a thorough and time-intensive review of the data at issue to identify the personal information subject to unauthorized access and acquisition and determine to whom the personal information relates. On May 28, 2024, after a comprehensive review, it was determined that some of your personal information was subject to unauthorized access/acquisition.

WHAT INFORMATION WAS INVOLVED? The investigation determined that the following types of your personal information were involved: your <<b2b_text_1(name, data elements)>>.

WHAT WE ARE DOING. Please know that protecting your personal information is something that we take very seriously. IMS, with the assistance of third-party cybersecurity experts, retained through outside counsel, conducted a diligent investigation to confirm the nature and scope of the Incident. We also took steps to reduce the likelihood of a similar event occurring in the future, and we continue to make additional improvements that strengthen our cybersecurity posture. *Although we are unaware of your personal information having been fraudulently used, we are nevertheless providing you with access to twenty-four (24) months of complimentary identity monitoring services through Kroll*. Individuals who wish to receive these services must activate by following the below activation instructions.

WHAT YOU CAN DO. We encourage you to remain vigilant against identity theft and fraud by reviewing your financial account statements and credit reports for any anomalies and encourage you to notify your financial institution of any unauthorized transactions or suspected identity theft. We also encourage you to review the enclosed *Additional Steps to Protect Your Personal Information and State Law Information* for additional guidance. You should be on guard for schemes where malicious actors may pretend to represent IMS or reference this Incident.

To help protect your identity, we have secured the services of Kroll to provide you with complimentary identity monitoring services for twenty-four (24) months. Your identity monitoring services include credit monitoring, web watcher, $1 Million identity fraud loss reimbursement, fraud consultation, and identity theft restoration.

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

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

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

For more information about Kroll and your identity monitoring services, you can visit info.krollmonitoring.com. Please have your membership number (located above) for reference.

FOR MORE INFORMATION. Should you have any questions regarding this Incident, please contact our dedicated call center by dialing (866) 992-9742 toll-free Monday – Friday between 8 am – 5:30 pm CT (excluding major U.S. holidays).

We regret any concern or inconvenience this Incident may cause you.

Sincerely,

Infosys McCamish Systems, LLC

Enclosures:

Additional Steps to Protect Your Personal Information and State Law Information

Kroll Identity Monitoring Services Information

Additional Steps to Protect Your Personal Information and State Law Information

Monitor Your Accounts

We recommend that you regularly review statements from your accounts and periodically obtain your credit report from one or more of the national credit reporting companies. 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 credit grantors 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 listed below.

Equifax	**Experian**	**TransUnion**
P.O. Box 105788	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30348-5788	Allen, TX 75013-9554	Chester, PA 19016-2000
1-800-685-1111	1-888-397-3742	1-888-909-8872
www.equifax.com/personal/credit-report-services	www.experian.com/freeze/center.html	www.transunion.com/credit-freeze

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:

1) Full name, with middle initial and any suffixes;
2) Social Security number;
3) Date of birth (month, day, and year);
4) Current address and previous addresses for the past five (5) years;
5) Proof of current address, such as a current utility bill or telephone bill; and
6) Other personal information as required by the applicable credit reporting agency.

If you request a credit freeze online or by phone, then the credit reporting agencies have one (1) business day after receiving your request to place a credit freeze on your credit file report. If you request a lift of the credit freeze online or by phone, then 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, then the credit 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 file at no cost. An initial fraud alert lasts 1-year and is placed on a consumer's credit file. 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 is a fraud alert lasting 7 years. Should you wish to place a fraud alert, please contact any one of the agencies listed below. The agency you contact will then contact the other two credit agencies.

Equifax
P.O. Box 105788
Atlanta, GA 30348-5788
1-888-766-0008
www.equifax.com/personal/credit-report-services

Experian
P.O. Box 9554
Allen, TX 75013-9554
1-888-397-3742
www.experian.com/fraud/center.html

TransUnion
P.O. Box 2000
Chester, PA 19016-2000
1-800-680-7289
www.transunion.com/fraud-victim-resource/place-fraud-alert

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
www.ftc.gov/idtheft

California Residents: Visit the California Office of Privacy Protection (https://oag.ca.gov/privacy) for additional information on protection against identity theft.

District of Columbia Residents: You may obtain information about preventing and avoiding identity theft from the Office of the Attorney General for the District of Columbia at:

Office of the Attorney General for the District of Columbia
400 6th Street, NW
Washington, D.C. 20001
(202) 727-3400
Email: oag@dc.gov
https://oag.dc.gov/Consumer

Maryland Residents: You may obtain information about preventing and avoiding identity theft from the Maryland Attorney General's Office at:

Attorney General of Maryland
200 St. Paul Place
Baltimore, MD 21202
Telephone: 1-888-743-0023
www.oag.state.md.us

New Mexico Residents: You have rights under the federal Fair Credit Reporting Act ("FCRA"). These include: the right to access information in your consumer file at a consumer reporting agency; to dispute incomplete or inaccurate information in your consumer file at a consumer reporting agency; to have consumer reporting agencies correct or delete inaccurate information in your consumer file; the right to block information in your consumer file that is the result of identity theft; and the right to have a fraud alert placed on your consumer file (as described above). For more information, please visit www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf.

New York Residents: You may obtain information about security breach response and identity theft prevention and protection from the following New York state agencies:

New York Attorney General
Consumer Frauds & Protection Bureau
The Capitol
Albany, NY 12224-0341
(800) 771-7755
https://ag.ny.gov/consumer-frauds-bureau

New York Department of State
Division of Consumer Protection
99 Washington Avenue, Suite 650
Albany, NY 12231
(800) 697-1220
www.dos.ny.gov

North Carolina Residents: You may obtain information about preventing identity theft from the North Carolina Attorney General's Office at:

Office of the Attorney General of North Carolina
114 West Edenton Street
Raleigh, NC 27699-9001
Telephone: 1-919-716-6400
www.ncdoj.gov

Oregon Residents: You may obtain information about reporting suspected identity theft from the following Oregon agencies:

Office of the Attorney General
Oregon Department of Justice
1162 Court St. NE
Salem, OR 97301-4096
Email: AttorneyGeneral@doj.state.or.us

Office of Attorney General
Consumer Protection
Toll-Free: 1-877-877-9392
https://justice.oregon.gov/consumercomplaints/

Rhode Island Residents: This incident affected 2,424 individuals. Under Rhode Island law, you have the right to obtain a police report filed 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 obtain information about preventing identity theft from the Rhode Island Attorney General's Office at:

Rhode Island Office of the Attorney General
150 South Main Street
Providence, RI 02903
1-401-274-4400
www.riag.ri.gov

KROLL

TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You have been provided with access to the following services from Kroll:

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.

EXHIBIT B

List of Impacted Data Owners (IMS customers)[1]

- Oceanview Life and Annuity Company

[1] To be supplemented on a rolling basis as additional customers may request to be named in IMS' filing.