

**The Union Labor Life
Insurance Company**

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A Ullico Inc. Company

July 11, 2019

The Honorable Tom Miller
Attorney General
Consumer Protection Division
1305 E. Walnut Street
Des Moines, IA 50319

RE: The Union Labor Life Insurance Company

Dear Attorney General Miller:

On April 1, 2019, the email account of an employee of The Union Labor Life Insurance Company (the "Company") was accessed by an unknown, unauthorized user. The employee received an email from a trusted, external business associate that included a login to what appeared to be a legitimate file sharing site. After the employee entered login credentials and approved a multi-factor authentication call, the unauthorized user gained access to contact information in the employee's Outlook email. A series of similar spam emails were then sent from the employee's company Outlook account to the employee's internal and external contacts.

The Company's Information Technology department was notified of the malicious email and within 90 minutes disabled the employee's email account, sequestered the employee's computer from the Company network and purged all instances of the malicious email from its system. A message was sent by the Company to recipients of the malicious emails informing them of the unauthorized access and advising them to delete the email.

It was determined that no emails with sensitive data were sent out from the employee's email address by the unauthorized user after gaining access. However, a forensic review of the emails and attachments in the employee's Outlook mailbox was conducted in case any sensitive data was downloaded or otherwise accessed from the employee's account.

The forensic review of emails in the employee's inbox and archived folders identified emails and attachments that contained one or more of the following: name, address, date of birth, gender, Social Security number, and/or personal health information. A closer review of those emails revealed that the data was submitted by benefit plans in the application or underwriting process for group life insurance and/or medical stop loss coverage with the Company. Because these products ensure the plans, the Company does not have a direct relationship with the individuals and does not have mailing addresses for a significant number of the affected individuals whose information was found in the data that was accessible in the mailbox during the incident.

The Company is in the process of notifying the affected groups and acquiring mailing addresses for affected individuals. We are currently aware of approximately 7,464 affected Iowa residents. We have notified 8 Iowa residents July 8, 2019. However, the number is likely to grow as we acquire additional addresses of affected individuals from the groups. The total number of affected individuals countrywide that have been identified at this time is approximately 87,400.

The Company has engaged a third party vendor to satisfy individual notification requirements, staff a call center for questions from affected individuals, and offer 24 months of credit monitoring and identity theft protection at the Company's sole expense. Because we are still acquiring addresses of affected individuals, we will be conducting staggered notifications to individuals. We anticipate that the first batch of notifications and the opening of the call center will occur within the next 10 business days.

We have posted a press release on the Company website and notified major media outlets in the states and regions where affected individuals reside. We will update you with further developments as needed.

Please direct all inquiries about this matter to Christopher Noland, Assistant Vice President of Compliance, at 202-962-8933 (telephone), 202-682-6784 (fax), cnoland@ullico.com (email), or by mail.

Sincerely,



Christine Mullen
AVP, Compliance