

August 4, 2023

BY 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

To Whom It May Concern:

On behalf of The Global Atlantic Financial Group LLC (including its wholly owned subsidiaries Accordia Life and Annuity Company¹, Commonwealth Annuity and Life Insurance Company², First Allmerica Financial Life Insurance Company³, and Forethought Life Insurance Company⁴, collectively “Global Atlantic”), and pursuant to Iowa Code § 715C, this letter provides notice of a cybersecurity incident involving Iowa residents.

On June 7, 2023, Global Atlantic was informed by its third-party service provider, Pension Benefit Information LLC (“PBI”), that PBI had experienced an incident that PBI believed had resulted in the access and acquisition of certain Global Atlantic policyholder data, and that following further investigation it would provide details on the extent and scope of data impacted (the “PBI Incident”).

PBI provides Global Atlantic with death-matching services to determine whether certain Global Atlantic policyholders are still living. Global Atlantic’s third-party administrators provide PBI with the Global Atlantic policyholder data needed to perform these services.

As explained to Global Atlantic, on June 2, 2023, PBI discovered that it had been a victim of the MOVEit zero-day vulnerability, which it detected and mitigated that same day. PBI promptly launched an investigation into the nature and scope of the incident with the assistance of third-party cybersecurity specialists, and reported the event to federal law enforcement. PBI’s investigation revealed that an unknown actor accessed one of their MOVEit transfer servers on May 29, 2023 and May 30, 2023 and downloaded certain data from that system.

¹ NAIC Number 62200.

² NAIC Number 84824.

³ NAIC Number 69140.

⁴ NAIC Number 91642.

On June 7, 2023, PBI informed Global Atlantic that its policyholder data had been impacted by the incident, and that it would provide additional information regarding the nature and scope of data impacted following a forensic investigation. Global Atlantic immediately activated its incident response protocols while waiting for more information from PBI. Global Atlantic took steps to ensure it and its third-party administrators ceased sending policyholder data to PBI. Global Atlantic notified federal law enforcement of the PBI Incident on June 9, 2023.

On June 20, 2023, PBI confirmed the Global Atlantic files containing policyholder data that were in fact impacted. On June 29, 2023, Global Atlantic determined that the compromised data included certain policyholder names, policy numbers, Social Security numbers, dates of birth, gender, and address data, including for residents of Iowa.

While Global Atlantic's review is still ongoing, based on currently known information, Global Atlantic believes that approximately 10,634 Iowa residents were impacted.

The data compromise occurred entirely on PBI's systems as a result of the MOVEit zero-day vulnerability. Global Atlantic understands that it is one of many PBI customers impacted by the incident, and does not appear to have been specifically targeted. Global Atlantic has no reason to believe that the MOVEit zero-day vulnerability impacted its own systems or network environment. Given the nature of this third-party incident, Global Atlantic did not conduct an internal review of its controls in response to this incident. Global Atlantic is not taking efforts to recover the data, and is unaware of any efforts by PBI to recover the data.

Global Atlantic is notifying your office as well as individuals whose information was impacted. Global Atlantic is offering all impacted individuals a complimentary two-year membership of credit monitoring and identity theft protection services, and began providing notice to impacted individuals on July 28, 2023 via U.S. Mail. The notice to individuals has not been delayed as a result of law enforcement. A sample notification letter to impacted individuals is enclosed.

Global Atlantic will provide updates regarding any additional material information related to the incident as requested. Should you have any questions, please contact me at the information below.

Regards,

Catherine Valeri

Catherine Valeri
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The Global Atlantic Financial Group LLC

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July 28, 2023



J7450-L01-0000001 T00001 P001 *****SCH 5-DIGIT 12345
SAMPLE A SAMPLE - L01 POLICYHOLDER
APT ABC
123 ANY STREET
ANYTOWN, ST 12345-6789



RE: NOTICE OF [Subject_Line]

Dear Sample A. Sample:

At Global Atlantic, we do our best to protect your personal information and ensure our business partners do the same. Despite these efforts, we have been informed by Pension Benefits Information LLC (“PBI”) that they recently experienced a cybersecurity incident involving the MOVEit file transfer application, and that the incident has impacted our policyholder data. PBI is a third-party vendor that Global Atlantic uses to satisfy applicable regulatory obligations to identify the deaths of insured persons, which can impact premium payment obligations and benefit eligibility. PBI is one of hundreds of companies across a variety of industries that have been impacted by the MOVEit incident.

[Is_Policy_Active], we believe that the following types of personal identifiable information related to you were impacted: Name, [Data_Elements].

Please note that Global Atlantic’s environment was *not* compromised as a part of this incident. It is still safe to interact with our corporate systems and our website.

While we have no indication of identity theft or fraud related to this event, we take your personal information and privacy seriously. To help you protect your identity, **we are offering you a two-year membership in Experian’s® IdentityWorksSM**. This product provides you with superior identity theft detection and resolution of identity theft.

The following pages of this letter provide information about the incident, our response, and resources available to help you protect your information, including details about your two-year Experian® IdentityWorksSM membership.

Recommended next steps

Review the enclosed information and activate your complimentary two-year membership to start monitoring your personal information with Experian’s® IdentityWorksSM. To learn how, see the section below titled "Instructions on activating your membership with Experian's IdentityWorksSM."

We’re here to help

If you have questions or need more information, please visit our FAQ page at www.globalatlantic.com/MOVEit or contact Experian’s customer care team at 833-919-4754 toll-free Monday through Friday from 8:00 a.m. – 10:00 p.m. Central, or Saturday and Sunday from 10:00 a.m. – 7:00 p.m. Central. Be prepared to provide your engagement number B098720.

Sincerely,

Rob Arena
Co-President

Global Atlantic Financial Group (Global Atlantic) is the marketing name for The Global Atlantic Financial Group LLC and its subsidiaries, including Accordia Life and Annuity Company, Commonwealth Annuity and Life Insurance Company, First Allmerica Financial Life Insurance Company, and Forethought Life Insurance Company.

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What happened? On or around May 31, 2023, Progress Software disclosed that cyber criminals had actively exploited an unknown vulnerability in its MOVEit file transfer application. Because MOVEit is used by thousands of organizations to support the secure transfer of data for common business activities, this incident has affected many companies around the world. One of the organizations impacted by the MOVEit incident is PBI. PBI is a third-party vendor that provides services to insurance companies, including subsidiaries of Global Atlantic.

Upon learning of the incident, PBI initiated an investigation, which revealed that cyber criminals accessed one of their MOVEit transfer servers on May 29 and May 30, 2023, and downloaded certain data from that system. On June 7, 2023, PBI notified Global Atlantic that personal data for an uncertain number of policyholders had likely been taken by the cyber criminals.

What information was involved? [RI_Residents] Based on our analysis of the impacted data, we believe that the following categories of personal identifiable information related to you were impacted: **Name**, **[Data_Elements]**.

What we are doing. Upon learning of this incident, our organization engaged outside experts and has worked with PBI to understand the nature and scope of information impacted. We have also reported the incident to the appropriate authorities.

To help protect your identity, we are offering a complimentary two-year membership in Experian’s® IdentityWorksSM.

What you can do. Review the instructions below and activate your complimentary two-year membership to start monitoring your personal information with Experian’s® IdentityWorksSM. As always, you should remain vigilant and be on the alert for suspicious activity by reviewing your financial account statements and monitoring free credit reports to ensure there are no transactions or other activities that you did not initiate or authorize. You should report any suspicious activity to your financial advisor or the appropriate service provider.

Other important information. You can obtain information about data security, avoiding or preventing identity theft, or obtaining fraud alerts or a credit freeze from the Federal Trade Commission, your state Attorney General, and the three credit reporting agencies listed on the next page:

Federal Trade Commission	Attorney General
<p>You can contact the Federal Trade Commission at:</p> <p>www.identitytheft.gov</p> <p>600 Pennsylvania Avenue, NW Washington, DC 20580</p> <p>1-877-ID-THEFT (1-877-438-4338) 1-866-653-4261 (TTY)</p>	<p>You can contact the [State_of_Residence] Attorney General’s Office at:</p> <p>[AG_URL]</p> <p>[AG_Address]</p> <p>[AG_Phone]</p>

You are advised to contact local law enforcement, your state Attorney General’s Office, or the Federal Trade Commission to report suspected incidents of identity theft. If you have been the victim of identity theft, you have the right to file or obtain a police report with your local police.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a one-year alert that 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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any of the three major credit reporting agencies listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report. A “credit freeze” on a credit report will prohibit a credit reporting agency from releasing information in the credit report without the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report.

To request a credit freeze, individuals may need to provide some or all of the following information to the credit reporting agency:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three major credit reporting agencies listed below:

Equifax	Experian	TransUnion LLC
Phone: 1-888-298-0045 https://www.equifax.com/personal/credit-report-services/ Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069 Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Phone: 1-888-397-3742 https://www.experian.com/help/ Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013 Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	Phone: 1-800-916-8800 https://www.transunion.com/credit-help TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016 TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

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://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf> or www.ftc.gov.

This notice has not been delayed by law enforcement.

For More Information. If you have further questions or concerns please call 833-919-4754 toll-free Monday through Friday from 8:00 am – 10:00 pm Central, or Saturday and Sunday from 10:00 am – 7:00 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number B098720.



Instructions on activating your membership with Experian's® IdentityWorksSM

To help protect your identity, we are offering complimentary access to Experian® IdentityWorksSM for twenty-four (24) months.

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 twenty-four (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.

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 twenty-four (24)-month membership. 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 October 31, 2023** (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your activation code: **ABCDEFGHI**

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 833-919-4754 by October 31, 2023. Be prepared to provide engagement number B098720 as proof of eligibility for the Identity Restoration services by Experian.