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May 31, 2017

Via E-mail

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

Re: Security Breach Notification

Dear Attorney General Tom Miller:

We are providing notice on behalf of BMO Harris Bank N.A. (“BMO Harris” or the “Bank”) to the Consumer Protection Division, pursuant to IOWA CODE § 715C.2, about an incident involving 160 Iowa residents.

During the production of 2016 IRS Form 5498 for BMO Harris Bank IRA accounts, which were mailed May 15, 2017, an error occurred and some customers received their own Form 5498 along with another customer’s Form 5498, while other customers did not receive any form. Form 5498 includes name, address, the last four digits of the Social Security number, account number, IRA contributions for 2016, and Fair Market Value of the IRA as of December 31, 2016.

The Bank has sent letters to impacted customers that explain the issue, apologize, and offer one free year of identity theft protection and credit monitoring to impacted customers (those whose forms were sent to another customer as well as those customers who received a different customer’s form). BMO Harris is making every effort to ensure forms received in error are destroyed or returned to the Bank, and customers who did not receive their form will receive it by mail no later than May 31, 2017. This incident does not impact our reporting of the information to the IRS.

BMO Harris values the privacy and security of its customers’ data and uses leading-edge technology and software to prevent unauthorized users from accessing customers’ bank accounts. Further, BMO Harris has policies and procedures in place to protect access to customer accounts. The Bank is not aware of any instances in which personal information has been misused, and believes the risk of misuse is low.

BMO Harris is reviewing its current processes for opportunities to implement enhancements with strengthened preventative and detective controls. In addition, the Bank is planning to strengthen oversight protocols over its vendor’s tax form printing and mailing processes.

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If you should have any questions or if we can provide assistance to your Iowa residents impacted by this incident, please feel free to contact me at (202) 661-2286 or phank@ballardspahr.com.

Sincerely,

/S/ Kim Phan

Kim Phan