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November 13, 2017

INTENDED FOR ADDRESSEE(S) ONLY

VIA U.S. MAIL

Iowa Attorney General
Consumer Protection Division
1305 E. Walnut Street
Des Moines, IA 50319

RECEIVED
17 NOV 17 AM 9:36
CONSUMER PROTECTION DIV.

Re: GNAC - Notice of Data Event

Dear Sir or Madam:

We represent Gallagher NAC (“GNAC”), 16476 Wild Horse Creek Road, Chesterfield, MO 63017, and are writing to notify your office of an incident that may affect the security of personal information relating to approximately one thousand one hundred twelve (1,112) Iowa residents. The investigation into this event is ongoing, and this notice will be supplemented with any substantive information learned subsequent to its submission. By providing this notice, GNAC does not waive any rights or defenses regarding the applicability of Iowa law, the applicability of the Iowa data event notification statute, or personal jurisdiction.

Nature of the Data Event

GNAC provides organization management services to associations throughout the country and, in connection with providing these services, receives certain information relating to association members from these organizations. On September 21, 2017, system monitoring tools identified unusual activity relating to a database that is tied to a web application used by GNAC customers. GNAC disabled the web application and immediately launched an investigation to determine the nature and scope of this activity. A leading third-party forensic investigation firm was retained to assist with the internal investigation. Although the investigation is ongoing, it was determined on October 6, 2017 that there was evidence a small amount of data left GNAC’s system between June 18, 2017 and September 19, 2017. As we cannot determine the contents of this data, we cannot rule

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out that it included personal information belonging to members of associations serviced by GNAC.

Notice to Iowa Residents

On October 13, 2017, GNAC began providing notice of this incident to its current and former association customers impacted by this incident in substantially the same form as the letter attached hereto as **Exhibit A**. On November 13, 2017, GNAC mailed written notice of this incident to the association members whose personal information, including first and last name and Social Security number, were contained in the GNAC database at the time of this incident in substantially the same form as the letter attached hereto as **Exhibit B**. GNAC is providing notice to impacted Iowa residents and your office on behalf of the GNAC current and former clients on the list attached hereto as **Exhibit C**.

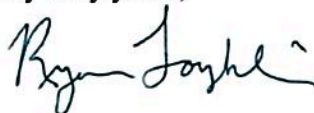
Other Steps Taken and To Be Taken

In addition to disabling the web application that was connected to the GNAC database, GNAC is working with its third-party security experts to ensure the security of its systems. GNAC is providing all individuals whose personal information was in the GNAC database with access to 12 months of free credit and identity monitoring services, including identity restoration services, through ID Experts and has established a dedicated hotline for potentially affected individuals to contact with questions or concerns regarding this incident. Additionally, GNAC is providing guidance on how to better protect against identity theft and fraud, including 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 consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. GNAC is reporting this incident to law enforcement. GNAC is also providing written notice of this incident to other state regulators and the consumer reporting agencies as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4786.

Very truly yours,



Ryan C. Loughlin of
MULLEN COUGHLIN LLC

Exhibit A

October 13, 2017

Dale Turvey, Area President
Gallagher NAC
16476 Wild Horse Creek Road
Chesterfield, MO 63017

Dear [Data Owner]:

As you know, we currently provide or previously provided organization management services to [Data Owner]. We are writing to inform you of a recently discovered event that has potentially impacted the security of information relating to certain current and former [Data Owner] organization members you provided to us. We are unable to confirm if the information was subject to unauthorized access and are unaware of any attempted or actual misuse of the information. However, we are writing out of an abundance of caution to inform you that, as outlined below, we will be providing notice on your behalf of this event to those [Data Owner] members whose personal information was in the database, as well as offering access to complimentary credit and identity monitoring and restoration services. We will also be disclosing this event to the consumer reporting agencies and relevant state regulators as required.

What Happened? On September 21, 2017, our system monitoring tools identified unusual activity relating to a database within our network that is tied to a web application used by customers. We disabled the web application and immediately launched an investigation to determine the nature and scope of this activity. A leading third-party forensic investigation firm was retained to assist with our own internal investigation. Although the investigation is ongoing, we determined on October 6, 2017 that there was evidence a small amount of data left our system between June 18, 2017 and September 19, 2017. As we cannot determine the contents of this data, we cannot rule out that this data included personal information relating to [Data Owner] members stored in the database.

What Information Was Involved? While our investigation is ongoing, we have determined the names and Social Security numbers of [insert number] individuals affiliated with your organization were contained in the database during the period that traffic was identified.

What We Are Doing. We took the steps detailed above to prevent any additional data from leaving our system and to determine the nature and scope of this event. We are working with our third-party forensic investigation team to ensure the security of our systems. We are reporting this incident to law enforcement, as necessary.

We note this event may result in the imposition of a legal obligation on your organization, as the owner of the data provided to us, to provide notice of this event to your organization members whose personal information was in the database, state Attorneys General, and the consumer reporting agencies. However, we are offering to provide notice to your organization's members on your behalf. And so, unless you notify us otherwise, on October 25, 2017, we will directly notify, on your behalf, the [insert number] individuals affiliated with your organization and provide these individuals with access to complimentary credit and identity monitoring and restoration services.

What You Can Do. We ask that you review this notice and attached sample letter. If you wish to complete these legal obligations internally, please inform us of such by October 25, 2017 by emailing us at GNACnotice@mullen.law.

We encourage you to contact us with questions regarding the contents of this letter, but we must note we are unable to provide you legal advice as we are not your attorney. If applicable, we encourage you to discuss this incident with any organization from which you received the personal information of your members that was then provided by you to us in connection with our relationship.

For More Information. We understand this event may concern you, or that you may have questions that were not addressed in this letter. Please feel free to contact Kevin Garvin at 630-285-3802 and we will assist in addressing any additional questions or concerns.

Sincerely,

Dale Turvey

Encl.

Exhibit B

Gallagher NAC

C/O ID Experts
PO Box 10444
Dublin, Ohio 43017-4044

To Enroll, Please Visit: www.idexpertscorp.com/protect Enrollment Code: [XXXXXXXX]

[Name]
[Address1]
[Address2]
[City, State Zip]

[Date]

Dear [First Name] [Last Name]:

RE: Notice of Data Breach

Dear [First Name, Last Name]:

Gallagher NAC (GNAC) currently provides or previously provided administrative services for [DATA OWNER]. We are writing to inform you of a recently discovered event at GNAC that has potentially impacted the security of information [DATA OWNER] provided to GNAC on your behalf. We are unable to confirm if your information was subject to unauthorized access and are unaware of any attempted or actual misuse of the information. However, we are writing out of an abundance of caution to provide you with steps you can take to better protect yourself against the possibility of identity theft and fraud, should you feel it appropriate to do so.

What Happened? On September 21, 2017, our system monitoring tools identified unusual activity relating to a database within our network that is tied to a web application used by GNAC customers, including [DATA OWNER]. We disabled the web application and immediately launched an investigation to determine the nature and scope of this activity. A leading third-party forensic investigation firm was retained to assist with our own internal investigation. Although the investigation is ongoing, we determined on October 6, 2017 that there was evidence a small amount of data left our system between June 18, 2017 and September 19, 2017. As we cannot determine the contents of this data, we cannot rule out that this data included personal information relating to [DATA OWNER] members stored in the database.

What Information was Involved? While our investigation is ongoing, we wanted to inform you that information of yours contained in the database during the period in question included your name and Social Security number.

What We Are Doing. GNAC takes the security of your information very seriously. In addition to taking the steps detailed above to prevent any additional data from leaving our system and determine the nature and scope of the event, we provided notice of this event to [DATA OWNER]. While we are unable to say if any record containing your information was impacted, in an abundance of caution we are offering identity theft protection services through ID Experts®, the data breach and recovery services expert, to provide you with MyIDCare™. MyIDCare services include: 12 months of credit monitoring, a \$1,000,000 insurance reimbursement policy, exclusive educational materials and fully managed id theft recovery services. With this protection, MyIDCare will help you resolve issues if your identity is compromised.

You are automatically covered for the fully managed identity resolution services, so there is no need to enroll for this benefit. If you have an identity theft issue, simply call ID Experts at (877) 919-7247 for immediate assistance.

We have been working with our third-party forensic investigation team to ensure the security of our systems. We are reporting this incident to law enforcement, as necessary. We also provided notice of this event to state regulators and consumer reporting agencies as required.

What You Can Do. You can review the enclosed *Steps You Can Take to Protect Against Identity Theft and Fraud*, which contains information on what you can do to better protect yourself against the possibility of identity theft and fraud should you feel it is appropriate to do so.

We also encourage you to enroll in the free credit monitoring and insurance services by using the enrollment code at the top of this letter and going to www.idexpertscorp.com/protect. Please note the deadline to enroll in credit monitoring and insurance services is [Enrollment Deadline].

For More Information. We sincerely regret any inconvenience or concern this may have caused. We understand you may have questions that are not answered in this letter. To insure your questions are answered in a timely manner, you can call our dedicated assistance line at (877) 919-7247, Monday through Friday from 8 a.m. to 8 p.m. Eastern Time (excluding U.S. holidays).

Sincerely,

A handwritten signature in black ink that reads "Dale Turvey". The signature is written in a cursive style with a large initial "D" and "T".

Dale Turvey
Area President

Encl.

Steps You Can Take to Protect Against Identity Theft and Fraud

Please Note: Minors, under the age of 18, should not have a credit history established and are under the age to secure credit. Therefore credit monitoring may not be applicable at this time. All other services provided in the membership will apply. No one is allowed to place a fraud alert on your credit report except you, please follow the instructions below to place the alert.

1. Website and Enrollment. Go to www.idexpertscorp.com/protect and follow the instructions for enrollment using your Enrollment Code provided at the top of the letter. Once you have completed your enrollment, you will receive a welcome letter by email (or by mail if you do not provide an email address when you sign up). The welcome letter will direct you to the exclusive MyIDCare Member Website where you will find other valuable educational information.

2. Activate the credit monitoring provided as part of your MyIDCare membership, which is paid for by GNAC. Credit monitoring is included in the membership, but you must personally activate it for it to be effective. Note: You must have established credit and access to a computer and the internet to use this service. If you need assistance, MyIDCare will be able to assist you.

3. Telephone. Contact MyIDCare at (877) 919-7247 to gain additional information about this event and speak with knowledgeable representatives about the appropriate steps to take to protect your credit identity.

As a best practice, we encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. We recommend that you change your password and security question or answer, as applicable for any other online accounts for which you use the same user name and password or security question or answer as the user name and password used for your association account. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

If you discover any suspicious items and have enrolled in MyIDCare, notify them immediately by calling or by visiting their Member website and filing a theft report.

If you file a theft report with MyIDCare, you will be contacted by a member of our ID Care team who will help you determine the cause of the suspicious items. In the unlikely event that you fall victim to identity theft as a consequence of this incident, you will be assigned an ID Care Specialist who will work on your behalf to identify, stop and reverse the damage quickly.

At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax
P.O. Box 105069
Atlanta, GA 30348
800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
800-680-7289
www.transunion.com

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft, and you provide the credit bureau with a valid police report, it cannot charge you to place, list or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above

if you wish to place a freeze on all of your credit files. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
www.freeze.equifax.com

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

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
1-888-909-8872
www.transunion.com/credit-freeze

You can further educate yourself regarding identity theft, fraud alerts, and the steps you can take to protect yourself, by contacting the Federal Trade Commission or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. **For Maryland residents**, the Attorney General can be reached at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-888-743-0023; and www.oag.state.md.us. **For North Carolina residents**, the Attorney General can be contacted by mail at 9001 Mail Service Center, Raleigh, NC 27699-9001; toll-free at 1-877-566-7226; by phone at 1-919-716-6400; and online at www.ncdoj.gov. **For Rhode Island residents**, the Attorney General can be contacted by mail at 150 South Main Street, Providence, RI 02903; by phone at (401) 274-4400; and online at www.riag.ri.gov. Approximately 76 Rhode Island residents may be impacted by this incident. **For New Mexico residents**, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit "prescreened" offers of credit and insurance you get based on information in your credit report; and you may seek damages from violator. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf, or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580. You have the right to file a police report if they ever experience identity theft or fraud, and instances of known or suspected identity theft should be reported to law enforcement. Please note that in order to file a police report or incident report with law enforcement for identity theft, you will likely need to provide some kind of proof that they have been a victim. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. This notice has not been delayed by law enforcement. [Variable Data 2]

Exhibit C

AmeriBenefit Plan
American Association of Private Employees
America's Business Benefit Association (ABBA)
Benefits Association Inc.
Consumer Health Association
Healthy America Association
National Consumer Advantage Association
National Consumer Alliance Association
National Family Benefit Association
Plan Services Association
Small Business Association of America
United Business Association
United Business Association-haa
US Benefit Plan