



June 14, 2023

Maryland Office of the Attorney General
200 St Paul Pl
Baltimore, MD 21202

RE: Data Security Event

Wilton Reassurance Company and its affiliates, Wilcac Life Insurance Company, Wilton Reassurance Life Company of New York, and Texas Life Insurance Company (collectively, "Wilton Re") are submitting this notice to provide your office with information regarding a cybersecurity event that may have resulted in unauthorized access to consumer personal information ("PI"). Wilton Re is based in Norwalk, Connecticut and provides life, accident, and health insurance.

On June 7, Wilton Re was informed by its vendor, PBI Research Services ("PBI"), that Wilton Re records maintained by PBI were subject to unauthorized access related to the recently publicized MOVEit vulnerability (CVE-2023-34362). This vulnerability existed in a file transfer service offered by Progress Software, which PBI uses to transfer certain data related to Wilton Re's insurance customers. The attack has been attributed to the "C10P" group. While PBI's forensic investigation is ongoing, Wilton Re understands from public and government sources that the vulnerability allowed unauthorized actors to gain access to information within the MOVEit file transfer portal and exfiltrate that data. On June 7, PBI informed Wilton Re that the nature of the vulnerability allowed the attackers to bypass the encryption in place on the MOVEit portal and obtain the data in plaintext. PBI is actively investigating the incident to determine exactly what data may have been affected.

While awaiting the results of PBI's analysis, we examined the data that we most recently sent to PBI via the MOVEit portal, and on June 12 assessed that the data likely includes name, date of birth, Social Security Number, and policy number.

We are still working to determine the number of individuals affected by this incident. At this stage in our investigation, we suspect that 19,921 Maryland residents may have been impacted. We will ensure that any impacted individuals are notified and offered free credit monitoring and identity theft protection.

Wilton Re has ceased sending any data to PBI while the issue is being resolved. Wilton Re continues to evaluate possible further steps to address the situation with PBI. We also continue to engage with PBI on its investigation, however, we expect there will be limited recourse to recover the information the attackers stole.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Please note that we notified the New York Department of Financial Services and some state insurance departments and commissions in which we are domiciled and which we are required to notify on June 8, 2023. While we have not notified law enforcement of this incident, we understand PBI and other entities have notified them. We will update your office as to any material developments.

Should you have any questions please do not hesitate to contact our outside counsel: Michael Bahar (MichaelBahar@eversheds-sutherland.com or +1.202.383.0882) or Alexander Sand (AlexanderSand@eversheds-sutherland.com or +1.512.721.2721).



August 10, 2023

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202

RE: Data Security Event

Wilton Reassurance Company and its affiliates, Wilcac Life Insurance Company, Wilton Reassurance Life Company of New York, and Texas Life Insurance Company (collectively, "Wilton Re") previously notified your office of a cybersecurity event at a third-party vendor that resulted in unauthorized access to consumer personal information ("PI"). With the incident resolved and the investigation concluded, we wanted to provide you with an update. Wilton Re requests that the information furnished here remain confidential.

A cybercriminal group known as "CL0P" exploited a zero-day vulnerability in a file transfer service (MOVEit Transfer) in use at Wilton Re's vendor, PBI Research Services ("PBI"), between May 29 and May 30. The group downloaded files containing the personal data of some Wilton Re customers in the form of name, date of birth, policy number, and Social Security number. PBI uses this information to conduct legally required searches on behalf of Wilton Re for policyholders that may have passed away. The incident was limited to customer data within the MOVEit Transfer portal at PBI; Wilton Re's internal systems and data were not impacted.

Wilton Re worked closely with PBI throughout the incident to expeditiously identify the impacted data and notify the affected individuals. PBI's investigation concluded on June 21, and PBI notified a total of 18,672 Maryland residents and offered them 12 months of complimentary identity theft protection and credit monitoring. The mailings began on July 25 and completed on August 7. A copy of the template letter is attached for your reference.

At this time, Wilton Re considers the incident resolved. PBI reports that it patched all known vulnerabilities in MOVEit Transfer and has adopted additional safeguards to prevent future unauthorized access to consumer data.

Should you have any questions please do not hesitate to contact our outside counsel: Michael Bahar (MichaelBahar@eversheds-sutherland.com or +1.202.383.0882) or Alexander Sand (AlexanderSand@eversheds-sutherland.com or +1.512.721.2721).



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

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

<<b2b_text_3(Notice of Data Breach)>>

Dear <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

Pension Benefit Information, LLC ("PBI") provides audit and address research services for insurance companies, pension funds, and other organizations. <<b2b_text_5(variable sentence.)>> PBI is providing notice of a third-party software event that may affect the security of some of your information. Although we have no indication of identity theft or fraud in relation to this event, we are providing you with information about the event, our response, and additional measures you can take to help protect your information, should you feel it appropriate to do so.

What Happened? On or around May 31, 2023, Progress Software, the provider of MOVEit Transfer software disclosed a vulnerability in their software that had been exploited by an unauthorized third party. PBI utilizes MOVEit in the regular course of our business operations to securely transfer files. PBI promptly launched an investigation into the nature and scope of the MOVEit vulnerability's impact on our systems. Through the investigation, we learned that the third party accessed one of our MOVEit Transfer servers on May 29, 2023 and May 30, 2023 and downloaded data. We then conducted a manual review of our records to confirm the identities of individuals potentially affected by this event and their contact information to provide notifications. We recently completed this review.

What Information Was Involved? Our investigation determined that the following types of information related to you were present in the server at the time of the event: <<b2b_text_2(full name, data elements)>>.

What We Are Doing. We take this event and the security of information in our care seriously. Upon learning about this vulnerability, we promptly took steps to patch servers, investigate, assess the security of our systems, and notify potentially affected customers and individuals associated with those customers. In response to this event, we are also reviewing and enhancing our information security policies and procedures.

While we are unaware of any identity theft or fraud as a result of this event, as an additional precaution, PBI is offering you access to 12 months of complimentary credit monitoring and identity restoration services through Kroll. Details of this offer and instructions on how to activate these services are enclosed with this letter.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements and monitoring your free credit reports for suspicious activity and to detect errors for the next twelve to twenty-four months and to report suspected identity theft incidents to the institution. Please also review the enclosed *Steps You Can Take to Help Protect Personal Information*, which contains information on what you can do to safeguard against possible misuse of your information. You can also enroll in the credit monitoring services that we are offering.

For More Information. If you have additional questions, including for more information on why we process your information, you may call our toll-free assistance line at (866) 676-3194 Monday through Friday from 9:00 am to 6:30 pm Eastern time (excluding U.S. holidays). You may also write to PBI at 333 South Seventh Street, Suite 2400, Minneapolis, MN 55402.

Sincerely,

The PBI Team

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Kroll's Monitoring Services

To help relieve concerns and restore confidence following this event, we have secured the services of Kroll to provide identity monitoring at no cost to you for 12 months. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.¹

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.

Additional Information

- **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.
- **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.

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their credit report.

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 bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau 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:

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;

¹ 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.

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 bureaus listed below:

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

Additional Information

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state attorney general. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state attorney general. This notice has not been delayed by law enforcement.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

For Iowa residents, you are advised to report any suspected identity theft to law enforcement or to the Office of the Attorney General of Iowa, 1305 E Walnut St, Des Moines, IA 50319, 1-888-373-5044, <https://www.iowaattorneygeneral.gov/>. Information regarding placing a security freeze on your credit report is available at <https://iid.iowa.gov/security-freeze-for-credit-reports>.

For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their 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.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.

For Oregon residents, you may also contact the Oregon Office of the Attorney General: Oregon Department of Justice, 1162 Court St. NE, Salem, OR 97301-4096, 1-877-877-9392, help@oregonconsumer.gov, www.doj.state.or.us.



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

Dear Parent or Guardian

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

<<b2b_text_3(Notice of Data Breach)>>

Dear Parent or Guardian <<first_name>> <<middle_name>> <<last_name>> <<suffix>>:

Pension Benefit Information, LLC (“PBI”) provides audit and address research services for insurance companies, pension funds, and other organizations. <<b2b_text_5(variable sentence.)>> PBI is providing notice of a third-party software event that may affect the security of some of your minor’s information. Although we have no indication of identity theft or fraud in relation to this event, we are providing you with information about the event, our response, and additional measures you can take to help protect your minor’s information, should you feel it appropriate to do so.

What Happened? On or around May 31, 2023, Progress Software, the provider of MOVEit Transfer software disclosed a vulnerability in their software that had been exploited by an unauthorized third party. PBI utilizes MOVEit in the regular course of our business operations to securely transfer files. PBI promptly launched an investigation into the nature and scope of the MOVEit vulnerability’s impact on our systems. Through the investigation, we learned that the third party accessed one of our MOVEit Transfer servers on May 29, 2023 and May 30, 2023 and downloaded data. We then conducted a manual review of our records to confirm the identities of individuals potentially affected by this event and their contact information to provide notifications. We recently completed this review.

What Information Was Involved? Our investigation determined that the following types of information related to your minor were present in the server at the time of the event: <<b2b_text_2(full name, data elements)>>.

What We Are Doing. We take this event and the security of information in our care seriously. Upon learning about this vulnerability, we promptly took steps to patch servers, investigate, assess the security of our systems, and notify potentially affected customers and individuals associated with those customers. In response to this event, we are also reviewing and enhancing our information security policies and procedures.

While we are unaware of any identity theft or fraud as a result of this event, as an additional precaution, PBI is offering your minor access to 12 months of complimentary identity monitoring services through Kroll. Details of this offer and instructions on how to activate these services are enclosed with this letter.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your minor’s account statements and monitoring your minor’s free credit reports, where available, for suspicious activity and to detect errors for the next twelve to twenty-four months and to report suspected identity theft incidents to the institution. Please also review the enclosed *Steps You Can Take to Help Protect Personal Information*, which contains information on what you can do to safeguard against possible misuse of your minor’s information. You can also enroll your minor in the identity monitoring services that we are offering.

For More Information. If you have additional questions, including for more information on why we process your minor's information, you may call our toll-free assistance line at (866) 676-3194 Monday through Friday from 9:00 am to 6:30 pm Eastern time (excluding U.S. holidays). You may also write to PBI at 333 South Seventh Street, Suite 2400, Minneapolis, MN 55402.

Sincerely,

The PBI Team

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Kroll's Monitoring Services

To help relieve concerns and restore confidence following this incident, we have secured the services of Kroll to provide Minor Identity Monitoring, Fraud Consultation, and Identity Theft Restoration at no cost to you for 12 months. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Minors are ineligible for credit monitoring, but are eligible for identity protection services.¹

Visit <https://enroll.krollmonitoring.com> to activate and take advantage of your Minor Identity Monitoring services.

You have until <<b2b_text_6(activation deadline)>> to activate your Minor 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.

Additional Information

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

- **Minor Identity Monitoring.** Minor Identity Monitoring detects when names, addresses, and credit information is associated with your child's Social Security number. An alert will be sent to you when activity is detected. The presence of a credit file may be an indicator of identity theft or fraud for children who, as minors, should not have a credit history.
- **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.

Monitor Your Accounts

Although minors under the age of 18 typically do not have a credit file, under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their credit report.

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 bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a "credit freeze" on a credit report, which will prohibit a credit bureau 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 for your dependent/minor, you will need to provide the following information for both you and your dependent/minor:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;

² Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge. To activate services, a U.S. Social Security number and U.S. residential address is required.

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. Proof that you are the parent or legal guardian of the minor;
8. A copy of your minor's Social Security card,
9. A copy of your minor's birth certificate; and
10. 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 bureaus listed below:

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

Additional Information

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect their personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state attorney general. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state attorney general. This notice has not been delayed by law enforcement.

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For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their 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.

For New York residents, the New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov>.

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