



**KANSAS CITY LIFE
INSURANCE COMPANY**

3520 Broadway / P.O. Box 219139 / Kansas City, Missouri 64121-9139 / 816-753-7000

August 17, 2023

VIA EMAIL

Office of the Attorney General
Attn: Security Breach Notification
200 St. Paul Place
Baltimore, MD 21202
Idtheft@oag.state.md.us

Re: Notice of Data Security Incident

To the Attorney General of Maryland:

Kansas City Life Insurance Company is writing to provide notice of a recent data security incident involving one of our benefits administrators, The Hartford, that has affected some of our customers' personal information. The Company takes the privacy and security of the information in its control seriously and has taken steps to prevent a similar incident from occurring in the future.

Nature of the Security Incident

Kansas City Life contracts with The Hartford to provide claims administration services for group disability insurance claims. As part of its services, The Hartford uses vendor Pension Benefit Information, LLC ("PBI") to provide audit and research services. PBI utilizes MOVEit file transfer software and experienced a security breach resulting from a global cyberattack on MOVEit that exploited a vulnerability in the software. During the first week of June 2023, PBI notified The Hartford that the MOVEit cyberattack had impacted data shared by The Hartford.

On July 10, 2023, The Hartford notified Kansas City Life that personal information of some of our customers was likely accessed due to the PBI security breach. On July 21, 2023, The Hartford provided detailed information about the identity of the customers affected and the specific personal information exposed.

Type of Information and Number of Maryland Residents Affected

The investigation determined that this incident may have resulted in the exposure of the following information: full name, date of birth, Social Security number, and resident state/zip code. A total of 2 Maryland residents were affected. Notification letters to these individuals will be mailed on August 18, 2023. A sample copy of the notification letter is included with this correspondence.

Steps Taken Relating to the Incident

Upon learning of this incident, Kansas City Life moved quickly to investigate and gather complete information from The Hartford regarding the customers affected by the PBI breach. Kansas City Life does not use MOVEit software, and all of our internal information systems remain secure.

Kansas City Life has been working closely with The Hartford to ensure the secure handling of our customers' personal information going forward and to prevent a recurrence of a similar breach. To that end, The Hartford has provided assurances that PBI has applied the appropriate patches to its MOVEit Transfer server to eliminate the vulnerability that led to the breach. PBI's draft consumer letter (attached) confirms the server patches and also indicates that PBI is reviewing and enhancing its information security policies and procedures.

As a precaution, PBI will be providing 24 months of free credit monitoring services through Kroll to all affected customers. These customers will be receiving a separate letter directly from PBI with more information about Kroll credit monitoring services and how to enroll.

If you have any questions or need additional information about this incident, please do not hesitate to contact me at (816) 753-7299, ext. 8434, or by email at sarah.wiese@kclife.com.

Sincerely,



Sarah D. Wiese
Associate Counsel

Encl.: Sample Consumer Notification Letter; PBI Draft Consumer Letter



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3520 Broadway / P.O. Box 219139 / Kansas City, Missouri 64121-9139 / 816-753-7000

«date»

«firstname» «lastname» «suffix»

«address1»

«address2»

«city», «state» «zip»

Re: Notice of Data Security Incident

Dear «firstname» «lastname»:

We are writing to inform you of a data security incident affecting one of our benefits administrators, The Hartford, that may have involved your personal information. Kansas City Life Insurance Company values your business and takes the privacy and security of your personal information seriously. We are contacting you directly to explain the circumstances of the incident, the actions we have taken in response, and the steps you can take to help protect your personal information.

What Happened?

Kansas City Life contracts with The Hartford to provide claims administration services for group disability insurance claims. As part of its services, The Hartford uses vendor Pension Benefit Information, LLC (“PBI”) to provide audit and research services. PBI utilizes MOVEit file transfer software and experienced a security breach resulting from a global cyberattack on MOVEit that exploited a vulnerability in the software. During the first week of June 2023, PBI notified The Hartford that the MOVEit cyberattack had impacted data shared by The Hartford.

On July 10, 2023, The Hartford notified Kansas City Life that personal information of some of our customers was likely accessed due to the PBI security breach. On July 21, 2023, The Hartford provided detailed information about the identity of the customers affected and the specific personal information exposed.

What Information Was Involved?

The personal information involved may have included your full name, date of birth, Social Security number, and resident state/zip code. No medical or financial information was involved, and this incident in no way affects the determination of your claim. To date, we have no indication that your information has been subject to actual or attempted misuse in relation to this incident.

What We Are Doing

Upon learning of this incident, Kansas City Life moved quickly to investigate and gather complete information from The Hartford regarding the customers affected by the PBI breach. Kansas City Life does not use MOVEit software, and all of our internal information systems remain secure.

As a precaution, PBI will be providing 24 months of free credit monitoring services through Kroll to all affected customers. You will be receiving a separate letter directly from PBI with more information about Kroll credit monitoring services and how to enroll.

What You Can Do

In addition to enrolling in the credit monitoring being offered, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission.

You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting agencies – Equifax, Experian, and TransUnion. To order your free annual credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228.

In addition, you may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least 12 months. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. You may also place a security freeze, which prohibits a credit reporting agency from releasing any information from a consumer's credit report without written authorization. To place a fraud alert or security freeze on your credit report, contact any of the three credit reporting agencies using the contact information below:

Equifax P.O. Box 740241 Atlanta, GA 30374 www.equifax.com 1-800-525-6285	Experian P.O. Box 9554 Allen, TX 75013 www.experian.com 1-888-397-3742	TransUnion P.O. Box 2000 Chester, PA 19016 www.transunion.com 1-800-680-7289
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You may also contact the Federal Trade Commission for further information on fraud alerts, security freezes, and how to protect yourself from identity theft. The FTC can be contacted at: 400 7th Street SW, Washington, D.C. 20024; 1-877-382-4357; or www.consumer.ftc.gov/idtheft.

Kansas City Life apologizes for this incident and wants to assure you we are taking all steps necessary to ensure your personal information remains safe and secure. We appreciate your continued confidence in our Company.

For More Information

If you have any further questions, please contact the dedicated call center at 1-866-676-3915.

Sincerely,

Talva Parker
Vice President, Group

Additional Information

Security Freeze: To place a security freeze, you will need to provide the following information to the three credit reporting agencies:

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 past five (5) 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 you are a victim of identity theft.

For District of Columbia residents: The District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; 1-202-727-3400; and www.oag.dc.gov.

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 www.marylandattorneygeneral.gov/.

For Massachusetts residents: You have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you have the right to file a police report and obtain a copy it. You also have the right to request a security freeze free of charge, as described above.

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; and www.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 Rhode Island residents: You have the right to file or obtain any police report. You also have the right to request a security freeze free of charge, as described above. The Rhode Island Attorney General may be contacted at: 150 South Main Street, Providence, RI 02903; 1-401-274-4400; and www.riag.ri.gov.

For other states: Information on how to contact your state attorney general may be found at www.naag.org/naag/attorneys-general/whos-my-ag.php.



<<Return Mail Address>>

<<Name 1>> <<Name 2>>

<<Address 1>>

<<Address 2>>

<<Date>>

<<City>>, <<State>> <<Zip>>

<<Country>>

<<Notice of Data Breach>>

Dear <<Name 1>> <<Name 2>>:

Pension Benefit Information, LLC (“PBI”) provides audit and address research services for insurance companies, pension funds, and other organizations<<, including <<Data Owner>>. PBI is providing notice of a third-party software event that may affect the security of some of your information. 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 impacted server at the time of the event: name and <<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 24 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. Please also review the enclosed *Steps You Can Take to 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, you may call our toll-free assistance line at <<Kroll Call Center Number>> 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,

John Bikus
President
Pension Benefit Information, LLC

STEPS YOU CAN TAKE TO 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 24 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 <<IDMonitoringURL>> to activate and take advantage of your identity monitoring services.

You have until <<Date>> to activate your identity monitoring services.

Membership Number: <<Member ID>>

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 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.

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 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 District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; 202-727-3400; and oag.dc.gov.

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 Massachusetts residents, you have the right to obtain any police report filed in regard to this event. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

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 Rhode Island residents, the Rhode Island Attorney General may be reached at: 150 South Main Street, Providence, RI 02903; www.riag.ri.gov; and 1-401-274-4400. Under Rhode Island law, individuals have the right to obtain any police report filed in regard to this event. Fees may be required to be paid to the consumer reporting agencies. There are approximately [X] Rhode Island residents that may be impacted by this event.