July 18, 2024

CONFIDENTIAL – INTENDED FOR ADDRESSEE ONLY

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

Re: Notification of Data Security Incident

Dear Maryland Office of the Attorney General:

United of Omaha Insurance Company ("United of Omaha") is writing to inform you of an incident that involved the disclosure of personal information as required under Md. Code Com. Law §14-3501 et seq. The details of the incident are provided below.

Facts/Remediation Measures. On June 18, 2024, our information security team discovered a pattern of fraudulent activity linked to an employee that included unauthorized loan withdrawals on two Maryland residents' policies. Upon discovering the fraudulent activity, we immediately locked down the impacted accounts and initiated an investigation. The employee was promptly terminated and their access to all company systems was revoked.

Information involved and Number of Individuals. The former employee had authorized access to the policyholders' information in her role at United of Omaha. At this time, we believe the incident involved the personal information of two Maryland residents. The customers' online account contains information including name, mailing address, bank account information, social security number, date of birth, and insurance policy details.

United of Omaha will provide notification of this incident to the impacted Maryland residents. The notification letter will be mailed no later than July 22, 2024, via USPS First Class Mail, and offers complimentary identity protection services and provides information to the individual on steps that can be taken to protect their personal information. United of Omaha will also call the Maryland residents to proactively answer any questions and assist in setting up identity protection services.

The privacy and security of our customers' information is of critical importance to us. If you have further questions or need additional information about this incident, you may contact us at 1-844-213-3454 or by email at privacy.office@mutualofomaha.com.

Sincerely,

Tom Oldham
Chief Compliance Officer

[Date]

[First_Name] [Last_Name]
[Address_Line_1]
[Address_Line_2]
[City], [State] [Zip]

Dear [First_Name] [Last_Name],

We are writing to inform you of an incident that concerning your policy with Mutual of Omaha Insurance Company. The details of the incident are described below.

What Happened
On [date], our information security team discovered fraudulent activities on your account, including an unauthorized loan withdrawal of [amount]. Upon discovering the fraudulent activity, we immediately locked down your account and initiated an investigation. We determined that an employee was responsible for the fraudulent activity. This employee was promptly terminated and their access to all company systems was revoked.

What Information Was Involved
Our investigation determined this individual inappropriately used your personal information to access your Customer Access account or to fraudulently create an account on your behalf. Customer Access contains information about you including your name, mailing address, bank account information, social security number, date of birth, and insurance policy details.

What We Are Doing
We sincerely regret the inconvenience and concern caused by this incident and want to provide you with the following information.

- **You are not responsible for the fraudulent loan(s)**: Any loans that were taken out fraudulently have been identified, and you will not bear any responsibility for them.
- **Your policy value will be completely restored:** The value of your policy has been fully restored to reflect the state it would have been in had the fraudulent loan(s) never been taken.
- **You have a new Mutual of Omaha policy number.** We are taking this step to further protect your information and prevent unauthorized access to your account. We will provide you a separate letter with more information on this new policy number.
- **We are conducting a thorough investigation.** We continue to actively investigate this incident and develop mitigation plans to protect the privacy and security of your information. While this investigation is ongoing, your account is locked to prevent any unauthorized access.
- **You have access to complimentary identity theft protection services.** We are offering you 24 months of identity theft protection services. Please see below for signup instructions.

What You Can Do
We are sending you this Notice to alert you of this fraudulent activity and in accordance with applicable law. To further safeguard your account, we recommend you take the following steps:

- **Change Your Password:** If you have an online Customer Access account, please change your password immediately. If you do not have an account but suspect one might have been created fraudulently, please contact our customer service team at (888) 241-7327 to verify and secure your account.

- **Monitor Your Account:** Regularly check your policy details and account statements for any unusual activity. Report any discrepancies to us immediately. We also recommend you check your other bank accounts and credit report.
- **Update Contact Information:** Ensure that your contact information, including email address, bank account information, and telephone number is up to date to receive timely notifications and updates.

We have also arranged for Experian to provide you identity protection services for 24 months at no cost to you. The following identity protection services start on the date of this notice for use at any time during the next 24 months. We are offering complimentary access to Experian IdentityWorks℠ for one year.

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 two year 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 <u>identity restoration assistance is immediately available to you</u>, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary two year 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** [enrollment end date] (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: [URL]
- Provide your **activation code**: [activation code]

ADDITIONAL DETAILS REGARDING YOUR TWO YEAR EXPERIAN IDENTITYWORKS MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks.

You can contact Experian **immediately** regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian Credit Report at Signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Internet Surveillance:** Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **$1 Million Identity Theft Insurance***:** Provides coverage for certain costs and unauthorized electronic fund transfers.
- **Lost Wallet**: Provides assistance with canceling/replacing lost or stolen credit, debit, and medical cards.

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 [Experian TFN] by [enrollment end date]. Be prepared to provide engagement number [engagement number] as proof of eligibility for the Identity Restoration services by Experian.

For More Information
The privacy and security of our customers' information is of critical importance to us. For more information about preventing identity theft and protecting yourself against fraud, please see the attached materials.

If you have further questions or concerns, you may contact us at (888) 241-7327. Our representatives are available to assist you and provide any additional information you may need.

Again, we deeply regret any inconvenience or concern this incident may have caused and appreciate your understanding and patience as we resolve this matter. Thank you for your continued trust in Mutual of Omaha.

Tom Oldham
Chief Compliance Officer

* Offline members will be eligible to call for additional reports quarterly after enrolling.
** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

Consumer Reference Guide

As a precautionary measure, consumers may wish to regularly review account statements and periodically obtain credit reports from one or more of the national credit reporting companies. Consumers may obtain a free copy of credit reports online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. Consumers may also purchase copies of credit reports by contacting one or more of the three national credit reporting agencies using the contact information listed below.

Consumers may wish to review credit reports carefully and look for accounts or creditor inquiries that are not initiated or recognized by consumer. If anything is seen that is not understandable, including inaccuracies in home address or Social Security number, consumers should call the credit reporting agency at the telephone number on the report.

Consumers should remain vigilant for incidents of fraud and credit activity with respect to reviewing account statements and credit reports, and promptly report any suspicious activity or suspected identity theft to the proper authorities, including local law enforcement, the state's attorney general and/or the Federal Trade Commission ("FTC"). The FTC or a state's regulatory authority may be contacted to obtain additional information about avoiding identity theft using the contact information listed below.

Fraud Alerts: There are also two types of fraud alerts that can be placed on credit reports to put creditors on notice that a consumer may be a victim of fraud: an initial alert and an extended alert. Consumers may ask that an initial fraud alert be placed on their credit report if they suspect they have been, or are about to be, a victim of identity theft. An initial fraud alert stays on credit reports for at least one year. An extended alert may be placed on credit reports if consumers have already been a victim of identity theft, with the appropriate documentary proof, and stays on credit reports for seven years. Consumers may place a fraud alert on their credit reports by contacting the toll-free fraud number of any of the three national credit reporting agencies listed below.

Credit Freezes: Consumers have the right to place a credit freeze or security freeze (referred to as "credit freeze") on their consumer reports. A credit freeze is designed to prevent credit, loans and services from being approved in a consumer's name without the consumer's consent. Using a credit freeze, however, may delay ability to obtain credit. Consumers may request that a freeze be placed on credit reports by sending a request to a credit reporting agency on-line or by certified mail, overnight mail or regular stamped mail to the three national reporting agencies listed below. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report.

Unlike a fraud alert, a credit freeze must be separately placed on a consumer's credit file at each credit reporting company. More information can be obtained about fraud alerts and credit freezes by contacting the FTC or one of the national credit reporting agencies listed below.

Reference Numbers:
Consumers may also purchase a copy of their credit report by contacting one or more of the three national credit reporting agencies listed below:

Equifax: P.O. Box 740241, Atlanta, Georgia 30374-0241, 1-800-685-1111, www.equifax.com
Experian: P.O. Box 9532, Allen, TX 75013, 1-888-397-3742, www.experian.com
TransUnion: P.O. Box 1000, Chester, PA 19022, 1-800-888-4213, www.transunion.com

Consumers can place a fraud alert on their credit report by contacting any of the three national credit reporting agencies listed below.

Equifax: P.O. Box 740241, Atlanta, Georgia 30374-0241, 1-800-525-6285, www.equifax.com
Experian: P.O. Box 9532, Allen, TX 75013,1-888-397-3742, www.experian.com
TransUnion: P.O. Box 1000, Chester, PA 19022, 1-800-680-7289, www.transunion.com

You can place a credit freeze on your credit report by contacting any of the three national credit reporting agencies listed below.

Equifax: P.O. Box 105788, Atlanta, GA 30348-5788,1-800-685-1111, www.equifax.com/personal/credit-report-services

Experian: P.O. Box 9554, Allen, TX 75013, 1-888-397-3742, www.experian.com/help

TransUnion: P.O. Box 2000, Chester, PA, 19022-2000, 1-800-909-8872, freeze.transunion.com/credit-help

Federal Trade Commission: Consumers may also obtain information about preventing and avoiding identity theft from the Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft.

The following paragraphs are state specific requirements. Remove if not applicable to the incident.

For residents of Maryland: Consumers may obtain information about preventing and avoiding identity theft from the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us.

For residents of Massachusetts: The following information should be included when requesting a credit freeze in Massachusetts (documentation for an individual and their spouse must be submitted when freezing a spouse's credit report): full name, with middle initial and any suffixes; Social Security number; date of birth (month, day and year); current address and previous addresses for the past five (5) years; and incident report or complaint with a law enforcement agency or the Department of Motor Vehicles. The request should also include a copy of a government-issued identification card, such as a driver's license, state or military ID card, and a copy of a utility bill, bank or insurance statement. Each copy should be legible, display name and current mailing address, and the date of issue (statement dates must be recent).

Consumers also have the right to obtain a police report.

For residents of New Mexico: Consumer has rights pursuant to the Fair Credit Reporting Act ("FCRA"), such as the right to be told if information in the consumer's credit file has been used against the consumer, the right to know what is in the consumer's credit file, the right to ask for consumer's credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the FCRA, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to the consumer's file is limited; the consumer must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance received based on information in the credit report; and consumer's may seek damages from violator. Consumer may have additional rights under the FCRA not summarized here. Identity theft victims and active-duty military personnel have specific additional rights pursuant to the FCRA. We encourage consumer to review their rights pursuant to the FCRA 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 Avenue NW, Washington, DC 20580.

For residents of New York: Consumers may obtain information about preventing and avoiding identity theft from the New York Attorney General's Office, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; https://ag.ny.gov/ or the New York Department of State Division of Consumer Protection at http://www.dos.ny.gov/consumerprotection.

For residents of North Carolina: Consumers may obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-5-NO-SCAM, www.ncdoj.gov.

For residents of Oregon: Consumers are advised to report any suspected identity theft to law enforcement, including the FTC and the Oregon Attorney General. For more information on security locks, you can visit the Oregon Department of Consumer and Business Services website at dfr.oregon.gov/financial/protect/Pages/stolen-identity.aspx and click "Place a credit freeze."

For residents of Rhode Island: Consumers have the ability to file or obtain a police report. Consumers may also obtain information about preventing and avoiding identity theft from the Rhode Island Attorney General's Office, Consumer Protection Division, 150 South Main Street, Providence, RI 02903, (401) 274-4400.

For residents of Washington D.C.: Consumers may obtain information about preventing and avoiding identity theft from the Washington D.C. Attorney General's Office, 441 4th Street, NW, Washington, DC 20001, 1-202-727-3400, oag.dc.gov.