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October 1, 2024

By Email to: ldtheft@oag.state.md.us

Re: Midland National Life Insurance Company, Notice of Security Breach

To the Office of the Attorney General:

Pursuant to Md. Code Ann., Com. Law. § 14-3501 et seq., we hereby provide notice of a security breach on behalf of Midland National Life Insurance Company ("Midland National"). This incident affected the personal information of 3 residents of Maryland. Midland National is in the process of mailing notifications to affected individuals, which will include an offer of complementary credit monitoring through Equifax.

What Happened

On September 6, 2024, Midland National Life Insurance Company (the "Company") learned that an account takeover attack on the Company's agent web-portal exposed certain personal information of certain owners of the Company's life insurance and annuities products. The attack was initially discovered by the Company on August 5, 2024, and the Company's investigation revealed the unauthorized access to the personal information on September 6, 2024. Using fraudulently obtained credentials to the portal accounts of five agents, the attacker may have viewed personal information related to owners of life insurance and annuity products issued by the Company. Internal investigations have determined that the attackers did not gain access to affected individuals' accounts and no funds were lost due to the incident, but they may have viewed financial details associated with affected individuals' life insurance and annuity products with the Company.

What Information Was Involved

Affected information may have included the following identifiers: customer names, customer account number (in the form of a policy or contract number), and account values. The Company believes the attacker already (and unrelated to this incident) had the impacted agents' names, Social Security Numbers, and dates of birth in their possession, which assisted the attacker in carrying out the attack.

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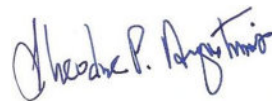
What Midland National Is Doing

Upon discovering the incident, the Company promptly initiated an internal investigation to determine the impact of the incident. The Company is offering Equifax® Complete™ Premier identity theft protection product for one (1) year at no cost to affected individuals.

As required by Md. Code Ann., Com. Law. § 14-3501 et seq., Midland National is providing notice of this incident to the affected Maryland residents by mail, using the enclosed template notification letter. On Midland National's behalf, we are providing notice of this incident to appropriate agencies in other jurisdictions as required by applicable law.

Please do not hesitate to contact us with any questions related to this matter.

Sincerely,

A handwritten signature in blue ink that reads "Theodore P. Augustinos". The signature is written in a cursive, flowing style.

Theodore P. Augustinos

[Company Logo]

[Date]

[Return Address Line 1]

[Insert Recipient's Name]

[Insert Address]

[Insert City, State, Zip]

RE: Important Security Notification. Please read this entire letter.

Dear [First Name] [Last Name]:

Midland National Life Insurance Company ("Midland National") is contacting you about a security incident that may have affected your personal information. Certain elements of your personal information may have been subject to compromise in an attack on our company network. As a result, and out of an abundance of caution, Midland National is notifying you of this incident and offering you credit monitoring services.

What Happened

On August 5, 2024, Midland National discovered an attack on a web-portal used by Midland National agents. We began investigating immediately. Our investigation consisted of a thorough review of our information systems affected by the attack, and has determined that the attacker may have viewed personal information related to owners of life insurance and annuity products issued by Midland National.

What Information Was Involved

Impacted information may have included the following identifiers: customer names, customer account number (in the form of a policy or contract number), and account values. We have no indication that your information has been misused, and no funds were stolen, but we wanted to formally notify you of the incident, our efforts to safeguard your personal information, and resources you may use to protect yourself.

What We Are Doing

We took immediate steps upon the discovery of the incident to terminate the attack and prevent any further unauthorized access to your information. As a precautionary measure to safeguard your personal information, we have partnered with Equifax® to provide its Complete™ Premier identity theft protection product to you for one (1) year at no cost to you. To activate this service, please email PrivacyQuestions@sfgmembers.com or call us at 877-586-0244 within thirty (30) days of this letter and we will provide you with your complimentary activation code. Our office hours are 7:30 am – 5:00 pm Central Monday through Thursday and 7:30 am – 12:30 pm Central on Friday. We have attached instructions to this letter with additional information on further steps you can take to protect yourself against identity theft and fraud.

What You Can Do

We recommend that you remain vigilant and review your account statements and credit reports regularly and report any concerning transactions to your financial services provider. If you have further questions or concerns, or would like an alternative to enrolling online, please call [Equifax #] toll-free. Our office hours are 7:30 am – 5:00 pm Central Monday through Thursday and 7:30 am – 12:30 pm Central on Friday. Be prepared to provide the activation code you receive from us.

We sincerely apologize for any inconvenience or concern this situation may cause. Again, we want to reassure you that we have taken steps to improve the security of personal information entrusted to us.

Sincerely,
Ryan Buren
Privacy Officer

Additional Information

There are a number of steps you should consider to guard against identity theft.

Review Your Account Statements and Order Your Free Credit Report: It is recommended that you remain vigilant for incidents of fraud and identity theft by regularly reviewing your account statements and monitoring your credit reports. Report any fraudulent transactions to the creditor or credit reporting agency from whom you received the statement or report. You may obtain a free copy of your credit report from each credit reporting agency once every 12 months, whether or not you suspect any unauthorized activity on your account, by visiting <https://www.annualcreditreport.com> or calling toll-free 877-322-8228. You may obtain a free copy of your credit report by contacting any one or more of the national consumer reporting agencies listed below.

Equifax

P.O. Box 740241
Atlanta, Georgia 30374
www.equifax.com
1-800-685-1111 Credit
Reports
1-888-766-0008 Fraud Alert
1-800-685-1111 Security
Freeze

Experian

P.O. Box 2002
Allen, TX 75013
www.experian.com
1-888-397-3742 Credit
Reports
1-888-397-3742 Fraud Alert
1-888-397-3742 Security
Freeze

TransUnion (FVAD)

P.O. Box 105281
Atlanta, GA 30348-5281
www.transunion.com
1-800-888-4213 Credit
Reports
1-800-680-7289 Fraud Alert
1-800-680-7289 Security
Freeze

Security Freezes and Fraud Alerts: You may obtain information about fraud alerts and security freezes (also referred to as credit freezes), including how to place a fraud alert or security freeze from the credit reporting agencies at the contact information provided above or the Federal Trade Commission (FTC). General guidance on protecting yourself from identity theft is available from the Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Ave. NW, Washington D.C. 20580, by phone at 877-ID-THEFT (438-4338), and/or from the FTC website at <http://www.ftc.gov/bcp/edu/microsites/idtheft>. If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact law enforcement, the FTC, and/or the Attorney General's office in your home state. Consumers have the right to file a police report if they ever experience identity theft or fraud and obtain a copy of it.

In many states, additional information is also available from your state's Attorney General's Office. There is no fee for requesting, temporarily lifting, or permanently removing a security freeze with any of the consumer reporting agencies. A security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. To request a security freeze, you will need to provide some personal information, such as your Social Security Number, proof of current address, and a legible photocopy of a government issued

identification. To place a fraud alert on your credit report (a less severe measure than a security freeze), contact any of the three credit reporting agencies identified above.

State Resources:

For residents of Massachusetts:

The consumer reporting agencies may require that you provide certain personal information (such as your name, Social Security number, date of birth, and address) and proper identification (such as a copy of a government-issued ID card and a bill or statement) prior to honoring your request to place a security freeze on your account, as described above.

For residents of New Mexico:

You should review personal account statements and credit reports, as applicable, to detect errors resulting from the security breach. You have rights under the federal Fair Credit Reporting Act ("FCRA"). These include, among others, the right to know what is in your file; to dispute incomplete or inaccurate information; and to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information. For more information about the FCRA, please visit https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf.

For residents of New York:

You can obtain information about how to protect yourself from identity theft from the contacts below.

**New York Attorney General's
Office Bureau of Internet and
Technology** (212) 416-8433
<https://ag.ny.gov/internet/resources-center>

**NYS Department of State's
Division of Consumer Protection**
(800) 697-1220
<https://www.dos.ny.gov/consumerprotection>

**New York
Attorney General**
(800) 771-7755
<https://ag.ny.gov/>

For residents of Vermont:

If you do not have internet access but would like to learn more about how to place a security freeze on your credit report, contact the Vermont Attorney General's office at: 1-800-649-2424 (toll-free in Vermont); (802) 656-3183.

For residents of Iowa:

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:

Office of the Attorney General of Iowa
1305 E Walnut St
Des Moines, IA 50319
515-281-5926 or 1-888-777-4590
<https://www.iowaattorneygeneral.gov/>

Information regarding placing a security freeze on your credit report is available at <https://www.iowaattorneygeneral.gov/for-consumers/general-consumer-information/identity-theft/security-freeze-identity-theft>.

For residents of Oregon:

State law advises you to report any suspected identity theft to law enforcement, including the FTC.

For residents of California:

Visit the **California Office of Privacy Protection** (<https://oag.ca.gov/privacy>) for additional information on protection against identity theft.

For residents of Rhode Island:

You can obtain information from the Rhode Island Attorney General about steps you can take to help prevent identity theft. You have the right to place a security freeze on your credit report at no charge, but note that consumer reporting agencies may charge fees for other services. You can contact the Rhode Island Attorney General at:

Rhode Island Office of the Attorney General

Consumer Protection Unit
150 South Main Street
Providence, RI 02903
(401) 274-4400
www.riag.ri.gov

For residents of Colorado, the District of Columbia, Maryland, and North Carolina:

You can obtain information from the respective Offices of the Attorney General about steps you can take to avoid identity theft.

Colorado Office of the Attorney General

Consumer Protection
1300 Broadway, 9th Floor
Denver, CO 80203
(720) 508-6000
www.coag.gov

Office of the Attorney General for the District of Columbia

Office of Consumer Protection
400 6th Street NW
Washington, D.C. 20001
(202) 442-9828
consumer.protection@dc.gov
www.oag.dc.gov

Maryland Office of the Attorney General

Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
consumer@oag.state.md.us
www.marylandattorneygeneral.gov

North Carolina Office of the Attorney General

Consumer Protection Division
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-566-7226
www.ncdoj.gov