

CONSUMER
STATE OF NH
DEPT OF JUSTICE
2015 APR 24 PM 12:56

[REDACTED]

[REDACTED]

April 17, 2015

INTENDED FOR ADDRESSEE(S) ONLY

VIA FIRST CLASS MAIL

Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Sir or Madam:

We represent Columbian Financial Group ("Columbian") located at 4704 Vestal Parkway East, Binghamton, NY 13902. We are writing to notify you of a data security event that may have compromised the security of personal information of 208 New Hampshire residents. Columbian's investigation into this event is ongoing, and this notice may be supplemented with new significant facts learned subsequent to this submission. By providing this notice, Columbian does not waive any rights or defenses regarding the applicability of New Hampshire law or jurisdiction.

Nature of the Data Security Incident

On March 18, 2015, Columbian discovered that a flash drive containing personal information for certain Columbian policyholders and their beneficiaries had been lost in the mail. Although the information on the flash drive was not encrypted, it was in a format that rendered it difficult to access. It also does not appear that someone opened the mailing and took the flash drive, but rather, that the package was damaged in transit and the flash drive was lost (but this is not confirmed). While Columbian immediately initiated an investigation, which is ongoing, to date we have been unable to locate the drive.

We have determined that the flash drive contained certain personal information for its policyholders and their beneficiaries, including their names, Social Security number, address, and bank account information for certain individuals.

Notice to New Hampshire Residents

Although Columbian's investigation is ongoing, it has determined that personal information of two hundred eight (208) New Hampshire residents was contained in certain files on the drive at the time of the loss. Notice will be mailed to these two hundred eight (208) New Hampshire residents on April 17, 2015, in substantially the same form as the letter attached as Exhibit "A."

Other Steps Taken and To Be Taken

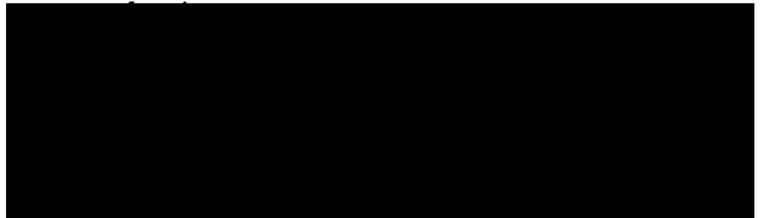
Columbian takes this matter, and the security of the personal information in its care, seriously. Columbian retained forensics experts to confirm the nature of this incident and the full scope of affected individuals. In addition to providing written notice of this incident to affected individuals, these individuals will be offered access to one (1) free year of identity protection services and identity restoration services. Columbian is also providing these individuals with information on how to protect against identity theft and fraud. Columbian is providing written notice of this incident to other regulators in the United States and Canada and to the national consumer reporting agencies in the United States.

Columbian has taken and is taking measures to minimize the risk of similar data incidents from occurring in the future. Columbian is no longer shipping flash drives containing policyholder information. Columbian is also reviewing its procedures surrounding the security and confidentiality of records containing personal information throughout the organization.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security incident, please contact us at 

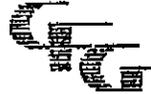
Very truly yours,



cc: New Hampshire Insurance Department

EXHIBIT A

THOMAS E. RATTMANN
CHAIRMAN OF THE BOARD
PRESIDENT AND
CHIEF EXECUTIVE OFFICER



COLUMBIAN FINANCIAL GROUP

April 17, 2015

##A9640-L01-0123456 0001 00000001 *****9.0BLZZ 123

SAMPLE A SAMPLE



APT ABC
123 ANY ST
ANYTOWN, US 12345-6789



Dear Sample A Sample:

Columbian Mutual Life Insurance Company ("Columbian") is writing to inform you of an incident that may affect the security of some of your personal information. We are providing this notice to you so that you may monitor your financial statements and take steps to protect your information should you feel it is appropriate to do so.

What happened? On March 18, 2015, Columbian discovered that a flash drive containing personal information for certain Columbian policyholders and their beneficiaries had been lost in the mail. Although the information on the flash drive was not encrypted, it was in a format that rendered it difficult to access. It also does not appear that someone opened the mailing and took the flash drive, but rather, that the package was damaged in transit and the flash drive was lost (but this is not confirmed). While Columbian immediately initiated an investigation, which is ongoing, to date we have been unable to locate the drive. We have determined that the flash drive contained certain personal information, including your name, Social Security number, and address.

What We Are Doing. Columbian takes the security of personal information in its possession very seriously. We are not aware of any actual or attempted misuse of your personal information. Nevertheless, we are providing you with helpful information on protection against identity theft and fraud, as well as access to one free year of credit monitoring and identity restoration services. We are also taking steps to prevent the risk of similar future data incidents.

What You Can Do. We are enclosing helpful information to help you protect against identity theft and fraud. You can also enroll to receive the free year of credit monitoring and identity restoration services we are offering. Please see the enclosed Notice of Privacy Safeguards for enrollment instructions.

Columbian apologizes for any inconvenience or concern that this may cause. We remain committed to the security of personal information for our policyholders and their beneficiaries. We have established a confidential call line to assist you with questions regarding the incident, this letter and steps you may take to protect your information. This confidential call line can be reached at (877) 238-2151, Monday through Friday, 9:00 a.m. to 7:00 p.m. EST. The reference number for this incident is 5344041015.

Sincerely,

Thomas E. Rattmann
Chairman Of The Board
President And Chief Executive Officer
Columbian Mutual Life Insurance Company

0123456



As described in our enclosed Notice of Privacy Safeguards, you have privacy rights under a state law that protects personal information. You may find out more about your privacy rights, safeguarding your identity, and enrolling in the complementary membership to Experian's® ProtectMyID® Alert by reading the enclosed Notice.

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**COLUMBIAN MUTUAL LIFE INSURANCE COMPANY
NOTICE OF PRIVACY SAFEGUARDS**

Columbian takes this matter, and the security of personal information entrusted to it, very seriously. In order to help further safeguard against any potential misuse of your personal information, we are offering you access to a complimentary one-year membership of Experian's® ProtectMyID® Alert. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate ProtectMyID Now in Three Easy Steps

1. ENSURE that you enroll by: [date] (Your code will not work after this date.)
2. VISIT the ProtectMyID Web Site to enroll: www.protectmyid.com/alert
3. PROVIDE your Activation Code: ABCDEFGHI

If you have questions or need an alternative to enrolling online, please call [800-xxx-xxxx] and provide engagement #: [engagement number].

Once your ProtectMyID membership is activated, you will receive the following features:

- ◆ Free copy of your Experian credit report
- ◆ Surveillance alerts for daily bureau credit monitoring and alerts of key changes & suspicious activity found on your Experian credit report.
- ◆ Identity Theft Resolution & ProtectMyID ExtendCARE: Toll-free access to US-based customer care and a dedicated Identity Theft Resolution agent who will walk you through the process of fraud resolution from start to finish for seamless service. They will investigate each incident; help with contacting credit grantors to dispute charges and close accounts including credit, debit and medical insurance cards; assist with freezing credit files; contact government agencies.
- ◆ ProtectMyID ExtendCARE: It is recognized that identity theft can happen months and even years after a data breach. To offer added protection, you will receive ExtendCARE™, which provides you with the same high-level of Fraud Resolution support even after your ProtectMyID membership has expired.
- ◆ \$1 Million Identity Theft Insurance*: Immediately covers certain costs including, lost wages, private investigator fees, and unauthorized electronic fund transfers.

Once your enrollment in ProtectMyID is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-297-7780.

In addition to enrolling and receiving the monitoring services described above, we encourage you to remain vigilant, to review your account statements, and to monitor your credit reports and explanation of benefits forms for suspicious activity. 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.

(OVER PLEASE)

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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 can further educate yourself regarding identity theft, security freezes, and the steps you can take to protect yourself, by contacting the Federal Trade Commission or your state Attorney General. For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, (888) 743-0023, www.oag.state.md.us. For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, (919) 716-6400, www.ncdoj.gov. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580; www.ftc.gov/bcp/edu/microsites/idtheft/, 1-877-ID-THEFT (877-438-4338); TTY: 866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. Instances of known or suspected identity theft should also be reported to law enforcement. Please note that this notice was not delayed because of law enforcement.