



**Principal Life  
Insurance Company**

May 14, 2010

Michael A. Delaney  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

Re: Notice of Data Security Incident

Dear Attorney General Delaney:

I write to inform you of a recent data security incident identified by Principal Life Insurance Company ("Principal"). While investigating a few instances of fraudulent on-line activity, we identified similar on-line access to other accounts using the same Internet address used in the fraudulent activity. Based upon our forensic analysis, we believe that an unauthorized person using valid employer credentials (password and user name) gained access and viewed the group contract number, member name, Social Security Number, age, and employment status (active/terminated) of two (2) New Hampshire resident's in April. It is not clear how the employer's valid authorization credentials were compromised but our investigation continues.

Principal has taken several measures to help safeguard information on its website. Principal contacted the primary administrator for the employer group to re-establish valid and secure authorization credentials. We are also adding an additional Employer Access Code to the authentication process for employer administrators. This additional security measure further protects sensitive participant information available to employer administrators in the regular administration of their plan. Principal also sent a letter to the residents and is offering them one year of free credit monitoring through Equifax Personal Solutions, which includes toll-free customer service, 7-days a week, and \$25,000 in identity theft expense insurance (except in New York where such insurance is prohibited by law). Principal has provided information to the resident concerning the safeguarding of personal information, credentials and computers to avoid identity theft. A copy of the letter is attached.

Please do not hesitate to contact me if you have questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Gubbels", written over a light-colored rectangular background.

Rick Gubbels  
Chief Privacy Officer  
Principal Financial Group  
Des Moines, Iowa 50392-2250

Enclosure



## Sample Employee Letter – New Hampshire

Date

Consumer Name

Consumer Address

Consumer City, State, Zip Code

Promotion Code: #####

Dear

This letter is to inform you that someone who was not authorized by [ABC Company Name] appears to have gained access to [ABC Company Name] account online. This person may have gained unauthorized access to your personal information, including your name, group contract number, Social Security Number, age, employment status (active/terminated) and termination date if applicable. Please be assured that we continually evaluate our processes to best protect our customer's private information, and we are taking steps to ensure that an incident like this does not occur again.

The Principal Financial Group® takes the security and privacy of your personal information very seriously and wanted to inform you so that you can take proactive measures to prevent the potential for identity theft. ***Please read this letter carefully and in full, as it contains information important to you.***

To help safeguard your personal information, we have arranged with Equifax Personal Solutions to offer certain tools to assist you in protecting your identity and your credit information at no cost to you. Equifax Credit Watch™ Gold with 3-in-1 Monitoring identity theft protection will provide you with an "early warning system" to changes to your credit file and help you to understand the content of your credit file at the three major credit reporting agencies.

To sign up online for **online delivery** go to [www.myservices.equifax.com/tri](http://www.myservices.equifax.com/tri)

1. Consumer Information: complete the form with your contact information (name, address and e-mail address) and click "Continue" button. The information is provided in a secured environment.
2. Identity Verification & Payment Information: complete the form with your Social Security number, date of birth, telephone #s, create a User Name and Password, agree to the Terms of Use and enter the promotion code provided at the top of your letter in the "Enter Promotion Code" box and click "Continue" button. This code eliminates the need to provide a credit

card number for payment. The system will ask you up to two security questions. This is the Equifax Identity Verification Process.

3. Order Summary: click “Continue” button.
4. Order Confirmation: click “View My Product” to access your 3-in-1 Credit Report and other product features.

To sign up for **US Mail delivery**, dial 1-866-937-8432 for access to the Equifax Credit Watch automated enrollment process. Note that all credit reports and alerts will be sent to you via US Mail only.

1. Promotion Code: You will be asked to enter your promotion code as provided at the top of your letter.
2. Customer Information: You will be asked to enter your home telephone number, home address, name, date of birth and Social Security number.
3. Permissible Purpose: You will be asked to provide Equifax with your permission to access your credit file and to monitor your file. Without your agreement, Equifax can not process your enrollment.
4. Order Confirmation: Equifax will provide a confirmation number with an explanation that you will receive your Fulfillment Kit via the US Mail (when Equifax is able to verify your identity) or a Customer Care letter with further instructions (if your identity can not be verified using the information provided). Please allow up to 10 business days to receive this information.

There are other steps you can take to further protect yourself against identity theft or other unauthorized use of personal information if you are concerned.

- We recommend that you remain vigilant and regularly review your account statements, credit card bills and your credit report for any unauthorized activity. Promptly report incidents of suspected identity theft or fraud to your local law enforcement agency, your state Attorney General’s Office, the Federal Trade Commission, and your service provider and to one of the three nationwide consumer reporting agencies listed below to have it removed from your credit file.
- You may contact the fraud departments of the three major credit reporting agencies to discuss your options. You have the right to place a free 90-day fraud alert on your credit file. A fraud alert lets creditors know to contact you before opening new accounts. It also may delay your ability to obtain credit. To place a fraud alert on your credit report contact the three credit reporting agencies below.

Experian  
(888) 397-3742  
P.O. Box 9532  
Allen, TX 75013  
[www.experian.com](http://www.experian.com)

Equifax  
(877) 478-7625  
P.O. Box 740241  
Atlanta, GA 30374-0241  
[www.equifax.com](http://www.equifax.com)

TransUnion  
(800) 680-7289  
P.O. Box 6790  
Fullerton, CA 92834-6790  
[www.transunion.com](http://www.transunion.com)

- You can obtain a free copy of your credit report from each of the three nationwide consumer reporting agencies by calling 1-877-322-8228 or online at: [www.annualcreditreport.com](http://www.annualcreditreport.com).

Under federal law, you are entitled to one free copy of your credit report every 12 months from each of the three major credit reporting agencies. You may want to obtain copies of your credit report to ensure the accuracy of the report information.

- To learn more about protecting yourself from identity theft and to report incidents of identity theft, please contact the Federal Trade Commission:

**Federal Trade Commission**  
1-877-ID-THEFT (1-877-438-4338)  
Consumer Response Center  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
[www.consumer.gov/idtheft](http://www.consumer.gov/idtheft), or [www.ftc.gov/credit](http://www.ftc.gov/credit)

Be sure to secure your computer as well. For more information on computer security, please see <http://www.principal.com/privacy/customersecurity.htm>

Your privacy is important to us. We sincerely apologize for any inconvenience this may cause. If we can be of further assistance to you or provide you with any additional information, please do not hesitate to call us at **1-877-343-0478**.

Sincerely,

Rick Gubbels  
Chief Privacy Officer

† Insurance underwritten by member companies of American International Group, Inc. The description herein is a summary only. It does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for complete details of coverage and exclusions.

This product is not intended for minors (under 18 years of age).