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September 26, 2013

VIA OVERNIGHT DELIVERY

Office of the Attorney General
Consumer Protection and Antitrust Bureau
33 Capitol Street
Concord, NH 03301

Re: Security Breach Notification Letter

To Whom it May Concern:

We are writing on behalf of our client, Total System Services, Inc. ("TSYS"). On September 11, 2013, TSYS learned that an employee of Paragon Benefits, Inc., a third party claims administrator of the TSYS Employee Health Plan and the TSYS Retiree Health Plan, misappropriated a digital file from Paragon Benefits on September 5, 2013.

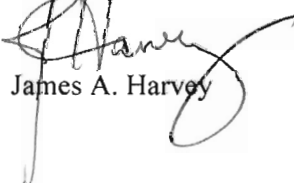
The file included names, address, birth dates and Social Security Numbers of a number of current and former TSYS employees. Based on the facts available to us today, no other personal information was misappropriated, including no banking, credit card, or healthcare treatment, diagnosis or payment information.

On September 27, 2013, TSYS, on behalf of the plans, will begin mailing the attached notification letter to the one potentially-affected individual in New Hampshire. In addition to notifying the potentially-affected individuals and the credit reporting agencies of this incident, TSYS has notified federal law enforcement.

In order to minimize any potential impact from this incident, TSYS is offering one year of credit monitoring, call center support and up to \$1 million dollars of identity protection insurance through Equifax Personal Solutions at no cost to each of the potentially-affected individuals.

If you have any questions regarding this incident, or if you desire further information or assistance, please call 404-881-7000 or email jim.harvey@alston.com.

Sincerely,



James A. Harvey

Attachment



Total System Services, Inc.
One TSYS Way
P.O. Box 2567
Columbus, GA 31902-2567
www.tsys.com

September __, 2013

[INSERT MERGE CODE FOR NAME]
[INSERT MERGE CODE FOR ADDRESS]

Dear [INSERT MERGE CODE FOR PREFERRED NAME],

On September 11, 2013, TSYS learned that an employee of Paragon Benefits, Inc., a third party claims administrator of the TSYS Employee Health Plan and the TSYS Retiree Health Plan, misappropriated a digital file from Paragon Benefits on September 5, 2013. This letter is delivered by TSYS on behalf of those plans.

The file included your name, address, birth date and Social Security Number. Based on the facts available to us today, no other personal information was misappropriated, including no banking, credit card, or healthcare treatment, diagnosis or payment information.

While federal law enforcement is actively investigating this incident, this notice was not delayed by the law enforcement investigation.

What are we doing to protect you?

TSYS has arranged for you to receive one year of free coverage under ID Patrol, an identity theft protection and credit monitoring product from Equifax. The actions you need to take to sign up for ID Patrol are set forth on the enclosed page labeled "Equifax ID Patrol Information." To obtain free coverage, you must use the following unique Activation Code to sign up for ID Patrol no later than December 31, 2013: [INSERT MERGE CODE FOR ACTIVATION CODE]. If you sign up for ID Patrol without using this Activation Code, you will have to pay for the service personally.

We are working with Paragon Benefits to improve its data security and management practices to reduce the likelihood of this occurring in the future. We have also advised the three major U.S. credit reporting agencies about this incident.

What can you do to protect yourself?

Regardless of whether or not you take advantage of the identity theft protection and credit monitoring services available from Equifax, please review the information in the enclosed Reference Guide to learn about additional steps you can take to monitor and protect against unauthorized use of your personal information. We also encourage you to file Form 14039 Identify Theft Affidavit with the IRS. More information is available at www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft. There is no cost to file Form 14039 with the IRS.

What should I do if I have any questions?

TSYS apologizes to you for this failure to protect the confidentiality of your personal information. If you have any questions regarding this incident, please review the Frequently Asked Questions (FAQs) found at www.tsys.com/ParagonFAQ. If you are a current TSYS team member, you may also access the FAQs through the Reference Center on www.benefitsolver.com. If the FAQs do not answer your questions, or if you need additional assistance, please call the TSYS Team Pay and Benefits Center between 8 a.m. and 7 p.m. Eastern Monday-Friday at +1.706.644.8747 or +1.877.644.8747.



Activation Code: INSERT MERGE CODE

ID Patrol Information

About the Equifax ID Patrol identity theft protection product ID Patrol 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. Note: You must be over age 18 with a credit file in order to take advantage of this product.

ID Patrol provides you with the following key features and benefits:

- o Comprehensive credit file monitoring and automated alerts of key changes to your **Equifax, Experian, and TransUnion** credit reports
- o Wireless alerts and customizable alerts available (available online only)
- o One 3-in-1 Credit Report and access to your Equifax Credit Report™
- o Ability to receive alerts if your Social Security Number or credit card numbers are found on Internet trading sites (available online only)
- o Ability to lock and unlock your Equifax Credit Report™ (available online only)
- o Up to \$1 million in identity theft insurance with \$0 deductible, at no additional cost to you †
- o 24 by 7 live agent Customer Service to assist you in understanding the content of your Equifax credit information, to provide personalized identity theft victim assistance and in initiating an investigation of inaccurate information.
- o 90 day Fraud Alert placement with automatic renewal functionality* (available online only)

How to Enroll: You can sign up online or over the phone

To sign up online for **online delivery** go to www.myservices.equifax.com/patrol

Welcome Page: Enter the Activation Code provided at the top of this page in the "Activation Code" box and click the "Submit" button.

1. Register: Complete the form with your contact information (name, gender, home address, date of birth, Social Security Number and telephone number) and click the "Continue" button.
2. Create Account: Complete the form with your email address, create a User Name and Password, check the box to accept the Terms of Use and click the "Continue" button.
3. Verify ID: The system will then ask you up to four security questions to verify your identity. Please answer the questions and click the "Submit Order" button.
4. Order Confirmation: This page shows you your completed enrollment. Please click the "View My Product" button to access the 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. Activation Code: You will be asked to enter your enrollment code as provided at the top of this 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 cannot 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.

† Identity theft insurance underwritten by subsidiaries or affiliates of Chartist Inc. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions. This product is not intended for minors (under 18 years of age)

* The Automatic Fraud Alert feature made available to consumers by Equifax Information Services LLC and fulfilled on its behalf by Equifax Consumer Services LLC

Reference Guide

We encourage you to take advantage of the protections offered by ID Patrol, an identity theft protection and credit monitoring service available from Equifax. Your Activation Code for one year of no cost coverage under ID Patrol is highlighted in yellow in the upper right-hand corner of the page labeled "Equifax ID Patrol Information." We also encourage you to file Form 14039 Identity Theft Affidavit with the IRS (more information is available at www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft).

Regardless of whether or not you take advantage of ID Patrol or file an Identity Theft Affidavit with the IRS, please remain vigilant for incidents of fraud and identity theft, including regularly reviewing and monitoring your credit reports and account statements. General information on obtaining copies of your credit reports, fraud alerts, credit freezes and services available through the Federal Trade Commission is set forth below. Note: some of the services described below are included in ID Patrol, the Equifax identity theft protection and credit monitoring service that TSYS is offering to you at no cost for 12 months.

Order Your Free Credit Report. To order your free annual credit report, call toll-free at (877) 322-8228, visit www.annualcreditreport.com, or complete the Annual Credit Report Request Form on the U.S. Federal Trade Commission's ("FTC") website at www.ftc.gov and mail it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281. The three credit bureaus provide free annual credit reports only through the toll-free number, website, or request form.

Upon receiving your credit report, review it carefully. Look for accounts you did not open. Look in the "inquiries" section for names of creditors from whom you have not requested credit. Some companies bill under names other than their store or commercial names; the credit bureau will be able to tell if this is the case. Look in the "personal information" section for any inaccuracies in information (such as home address and Social Security Number).

If you see anything you do not understand, call the credit bureau at the telephone number on the report. Errors may be a warning sign of possible identity theft. You should notify the credit bureaus of any inaccuracies in your report, whether due to error or fraud, as soon as possible so the information can be investigated and, if found to be in error, corrected. If there are accounts or charges you did not authorize, immediately notify the appropriate credit bureau by telephone and in writing. Information that cannot be explained should also be reported to your local police or sheriff's office because it may signal criminal activity.

Contact the U.S. Federal Trade Commission. If you detect any unauthorized transactions in any of your financial accounts, promptly notify the appropriate payment card company or financial institution. If you detect any incidence of identity theft or fraud, promptly report the matter to your local law enforcement authorities, state Attorney General and the FTC.

You can contact the FTC to learn more about how to protect yourself from becoming a victim of identity theft by using the contact information below:

Federal Trade Commission
Consumer Response Center
600 Pennsylvania Avenue, NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)
www.ftc.gov/idtheft/

Place a Fraud Alert on Your Credit File. To protect yourself from possible identity theft, consider placing a fraud alert on your credit file. A fraud alert helps protect against the possibility of an identity thief opening new credit accounts in your name. When a credit grantor checks the credit history of someone applying for credit, the credit grantor gets a notice that the applicant may be the victim of identity theft. The alert notifies the credit grantor to take steps to verify the identity of the applicant. You can place a fraud alert on your credit report by calling any one of the toll-free fraud numbers provided below. You will reach an automated telephone system that allows flagging of your file with a fraud alert at all three credit bureaus.

Equifax	Experian	TransUnion
1-877-478-7625 P.O. Box 740241 Atlanta, GA www.equifax.com	1-888-397-3742 P.O. Box 9532 Allen, TX 75013 www.experian.com	1-800-680-7289 Fraud Victim Assistance Division P.O. Box 6790 Fullerton, CA 92834-6790 www.transunion.com

Credit Freezes. You may have the right to put a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate a freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. In addition, you may incur fees to place, lift and/or remove a credit freeze. Credit freeze laws vary from state to state. The cost of placing, temporarily lifting, and removing a credit freeze also varies by state, generally \$5 to \$20 per action at each credit reporting company. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit bureau. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit bureaus at the numbers above to obtain more information.

U.S. State Notification Requirements

For Residents of Maryland. You may also obtain information about preventing and avoiding identity theft from the Maryland Office of the Attorney General:

Maryland Office of the Attorney General
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023 or 1-410-576-6550
www.oag.state.md.us

For Residents of North Carolina. You may also obtain information about preventing and avoiding identity theft from the North Carolina Attorney General's Office:

North Carolina Attorney General's Office
Consumer Protection Division
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-5-NO-SCAM or 1-919-716-6000
www.ncdoj.gov

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