

McKinnie, April

From: Allyson Weigand <aweigand@mullen.law>
Sent: Thursday, January 14, 2021 2:59 PM
To: Guyon, Stephanie
Cc: Vince Regan; Jennifer McKelvie; John Mullen
Subject: Preliminary Notice of Data Event - NWL - ID
Attachments: Notice of Data Event - NWL - ID.pdf

Dear Deputy Attorney General Guyon

Please see the attached Preliminary Notice of Data Event.

Thank you,

Allyson Weigand
Attorney
Mullen Coughlin LLC
426 W. Lancaster Avenue, Suite 200
Devon, PA 19333
(267) 930-4738 - Office
(484) 947-3848 - Mobile
aweigand@mullen.law



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MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

Vincent F. Regan
Office: (267) 930-4842
Fax: (267) 930-4771
Email: vregan@mullen.law

426 W. Lancaster Avenue, Suite 200
Devon, PA 19333

January 14, 2021

VIA E-MAIL

Deputy Attorney General Stephanie Guyon
Office of the Attorney General
Consumer Protection Division
954 W. Jefferson, 2nd Floor
Boise, ID 83720
E-mail: stephanie.guyon@ag.idaho.gov

Re: Notice of Data Event

Dear Deputy Attorney General Stephanie Guyon:

We represent National Western Life Insurance Company (“NWL”) located at 10801 North Mopac Expressway, Building 3, Austin, TX 78759, and are writing to notify your office of an incident that may affect the security of some personal information relating to Idaho residents. NWL is sharing confidential commercial and financial information. Should there be a request to share this information beyond the Department, we ask that you advise us of same. Disclosure of such information could harm or impair NWL’s private interest in controlling the availability of intrinsically valuable records, including records relating to security and business operations.

Nature of the Data Event

On August 15, 2020, NWL discovered a malware incident impacting certain company systems. NWL immediately launched an investigation, with the assistance of third-party investigators, to determine the nature and scope of this event. The investigation determined that certain files were accessed by an unauthorized actor as a result of this event. On or about September 29, 2020 a third-party firm was engaged to programmatically and manually review the files at issue to identify all impacted individuals and the types of data associated with those individuals. A significant number of files required review and that review is ongoing. However, we have a reasonable belief that notice will be required to Idaho individuals upon the completion of that review. As such, we are providing this preliminary notice of this event, and will update you once the total number of impacted Idaho residents and the data elements at issue for those Idaho residents are confirmed.

Other Steps Taken and To Be Taken

Upon learning of this incident, NWL moved quickly to investigate and respond to this incident, assess the security of its systems, and restore functionality to its environment. As part of its ongoing commitment to the security of information, NWL notified federal law enforcement and is reviewing and enhancing existing policies and procedures to reduce the likelihood of a similar future event.

As an added precaution, NWL will offer impacted Idaho residents access to 12 months of free credit monitoring and identity protection services through CyberScout. NWL will also providing impacted Idaho residents with guidance on how to better protect against identity theft and fraud. Such guidance includes information on how to place a fraud alert and security freeze on one's credit file, contact details for the national consumer reporting agencies, information on how to obtain a free credit report, reminders to remain vigilant for incidents of identity theft and fraud by reviewing account statements and monitoring free credit reports, and recommendations regarding how to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4842.

Very truly yours,



Vincent F. Regan of
MULLEN COUGHLIN LLC

VFR/amw
Enclosure