



MULLEN  
COUGHLIN<sub>LLC</sub>  
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426 W. Lancaster Avenue, Suite 200  
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January 25, 2021

**VIA E-MAIL**

Office of the Attorney General  
Consumer Protection and Antitrust  
Gateway Professional Center  
1050 E Interstate Avenue Suite 200  
Bismarck, ND 58503-5574  
E-mail: [ndag@nd.gov](mailto:ndag@nd.gov)

**Re: Notice of Data Event**

Dear Sir or Madam:

We represent National Western Life Insurance Company (“NWL”) located at 10801 North Mopac Expressway, Building 3, Austin, TX 78759, and are writing to supplement our previous notification to your office of an incident that may affect the security of some personal information relating to North Dakota 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**

As discussed in NWL’s preliminary notice to your office, 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. Concurrently, NWL internally reviewed their databases and on December 21, 2020, preliminarily determined the scope of impacted individuals as a result of this internal review. On January 21, 2021 NWL confirmed that four thousand seven hundred thirty-four (4,734) North Dakota residents were included in the impacted individuals identified through their preliminary internal review. This notice will be supplemented with additional information upon completion of the manual review.

The types of personal information potentially impacted vary by individual but at this time, include name and the following: life insurance or annuity policy number, Social Security Number, financial account information, and date of birth.

#### **Notice to North Dakota Residents**

On January 25, 2021, NWL began providing written notice of this incident to potentially affected individuals, which includes four thousand seven hundred thirty-four (4,734) North Dakota residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

#### **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 North Dakota residents access to twelve (12) months of free credit monitoring and identity protection services through CyberScout. NWL will also be providing impacted North Dakota 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

# **EXHIBIT A**



Return Mail Processing Center  
P.O. Box 6336  
Portland, OR 97228-6336

<<Mail ID>>  
<<Name 1>>  
<<Name 2>>  
<<Address 1>>  
<<Address 2>>  
<<Address 3>>  
<<Address 4>>  
<<Address 5>>  
<<City>><<State>><<Zip>>  
<<Country>>

<<Mail Date>>

**Re: Notice of Data Breach**

Dear <<Name 1>>:

National Western Life Insurance Company (“NWL”) is writing to notify you of an incident that may have impacted the security of your personal information. We want to provide you with information about the incident, our response, and steps you may take to better protect against possible misuse of your personal information, should you feel it necessary to do so.

**What Happened?** On August 15, 2020, NWL discovered a malware incident impacting certain company systems. We immediately launched an investigation, with the assistance of third-party investigators, to determine the nature and scope of this event. The investigation confirmed that certain data had been accessed and/or acquired by an unauthorized actor as a result of this event from August 7 to August 10, 2020. On December 21, 2020 we confirmed that personal information related to you was included in the impacted data.

**What Information was Involved?** The investigation and thorough review of the data that was impacted by this event is ongoing. To date, the investigation determined that your name and <<Data Elements>> may have been accessed and/or acquired by an unauthorized individual. The policy number for a current or former life insurance or annuity policy to which you may have been a party may have also been impacted by this event. As our investigation continues, should we learn that any additional types of sensitive data relating to you were impacted, we will update you to provide this additional information.

**What We Are Doing.** We take this incident and the security of personal information in our care very seriously. Upon learning of this incident, we moved quickly to investigate and respond to this incident, assess the security of our systems, restore functionality to our environment, and notify potentially affected individuals. As part of our ongoing commitment to the security of information, we notified federal law enforcement and are reviewing and enhancing existing policies and procedures to reduce the likelihood of a similar future event.

As a precautionary measure, we are notifying potentially affected individuals, including you, so that you may take further steps to best protect your personal information, should you feel it is appropriate to do so.

We regret any inconvenience or concern this incident may cause. As an added precaution, NWL is offering you access to <<CM Length>> months of free credit monitoring and identity protection services through CyberScout at no cost to you.

NATIONAL WESTERN LIFE INSURANCE COMPANY®  
PO Box 209080 | Austin, TX 78720-9080 | (Overnight Only) 10801 N Mopac Expy Bldg 3 | Austin, TX 78759-5415

www.nationalwesternlife.com | www.mynwl.com | 512-836-1010 | 800-922-9422

**What You Can Do.** Please review the enclosed *Steps You Can Take to Protect Your Information*, which contains information on what you can do to better protect against possible misuse of your information. We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. You will also find information on how to enroll in the credit monitoring services offered.

**For More Information.** We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call the dedicated assistance line that we have helped set-up at 800-599-9658 between 8:00 a.m. and 8:00 p.m. Central Time, Monday through Friday. You may also write to us at National Western Life Insurance Company Attn: CS 45, P.O. Box 209080, Austin, Texas, 78720-9080.

Again, we take the privacy and security of personal information in our care seriously, and sincerely regret any inconvenience or concern this incident may cause you.

Sincerely,

*National Western Life Insurance Company*

## *Steps You Can Take to Protect Your Information*

### **Enroll in Credit Monitoring**

We are providing you with access to these services at no charge: **Single Bureau Monitoring**, for <<CM Length>> months from the date of registration on Cyberscout HQ. You must authenticate your identity to begin receiving notifications and alerts related to your monitoring services. When changes occur to your Experian credit file, notification is sent to you the same day the change or update takes place with the bureau. In addition, we are providing you with proactive fraud assistance to help with any questions you might have. In the event you become a victim of fraud you will also have access remediation support from a Cyberscout Fraud Investigator. In order for you to receive the monitoring service described above, you must register and authenticate within 90 days from the date of this letter.

### **How do I enroll for the free services?**

To enroll in Monitoring\* services, please navigate to **<https://www.dataeventmonitoring.com>** and follow the instructions provided. When prompted, you are required to input the following Access Code to register on Cyberscout HQ:

<<Enrollment Code>>

Once registered on Cyberscout HQ, you must authenticate your identity to activate your services. Do this by selecting the Monitoring Services, “Use Now” link. Remember, in order for you to receive the monitoring services described above, you must register and authenticate within 90 days from the date of this letter.

### **Monitor Your Accounts**

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports 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](http://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.

You have the right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

**Experian**  
PO Box 9554  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

**TransUnion**  
P.O. Box 160  
Woodlyn, PA 19094  
1-888-909-8872

[www.transunion.com/credit-freeze](http://www.transunion.com/credit-freeze)

**Equifax**  
PO Box 105788  
Atlanta, GA 30348-5788  
1-888-298-0045

[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

To request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

**Experian**

P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/fraud/center.html](http://www.experian.com/fraud/center.html)

**TransUnion**

P.O. Box 2000  
Chester, PA 19016  
1-800-680-7289

[www.transunion.com/fraud-victim-resource/place-fraud-alert](http://www.transunion.com/fraud-victim-resource/place-fraud-alert)

**Equifax**

P.O. Box 105069  
Atlanta, GA 30348  
1-800-525-6285

[www.equifax.com/personal/credit-report-services](http://www.equifax.com/personal/credit-report-services)

**Additional Information**

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, [www.identitytheft.gov](http://www.identitytheft.gov), 1-877-ID-THEFT (1-877-438-4338). 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. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

*For District of Columbia residents*, the District of Columbia Attorney General can be contacted at 441 4th St. NW #1100 Washington, D.C. 20001; by phone at 202-727-3400; and by email at [oag@dc.gov](mailto:oag@dc.gov). You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

*For Maryland residents*, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-410-528-8662, [www.oag.state.md.us](http://www.oag.state.md.us).

*For New Mexico residents*, you have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; and you may seek damages from violators. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act by visiting [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf), or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

*For New York residents*, the Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; <https://ag.ny.gov/>.

*For North Carolina residents*, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6000, [www.ncdoj.gov](http://www.ncdoj.gov). You can obtain information from the Attorney General or the Federal Trade Commission about preventing identity theft.

*For Rhode Island Residents*, the Rhode Island Attorney General can be reached at: 150 South Main Street, Providence, Rhode Island 02903; [www.riag.ri.gov](http://www.riag.ri.gov), 1-401-274-4400. Under Rhode Island law, you have the right to obtain any police report filed in regard to this incident. There are 558 Rhode Island residents impacted by this incident.