WesternUnion WU

March 17, 2021

Craig Sharkey
Deputy General Counsel &
Chief Privacy and Data Governance Officer
7001 East Belleview Avenue, 8th Floor
Denver, CO 80237

Office of the Attorney General
600 East Boulevard Avenue, Department 125
Bismarck, ND 58505-0040

VIA UPS NEXT DAY AIR

To Whom It May Concern:

On February 22, 2021, the Kroger Company, a Western Union Retail Money Transfer Partner agent, informed Western Union that a file transfer service used by Kroger to transfer large data files associated with its money transfer operations, among other services, was compromised. Western Union's information systems were not affected by this incident, and we have no evidence that any money transfers were impacted.

The file transfer service was provided by Kroger's vendor, Accellion. Kroger used Accellion File Transfer Application (FTA) to transmit operational reports related to money transfers that were initiated or paid out in person at Kroger retail locations, as well as retail locations of additional Kroger-owned retail brands. The compromise resulted in an unauthorized party exfiltrating significant volumes of data and files from Kroger's Accellion FTA instance. Among other files taken from the Kroger FTA instance were compliance monitoring reports associated with Western Union money transfers initiated or paid out at Kroger and its subsidiaries' retail locations.

According to Kroger, Kroger learned of the unauthorized access on January 23, 2021 and the incident occurred between December 24, 2020 and December 29, 2020. Kroger notified the Cincinnati office of the Federal Bureau of Investigation of the incident on January 29, 2021. Kroger has also stated that its own information systems were not impacted. Finally, Kroger has assured us that it no longer uses the impacted service and has created a website for the incident (https://www.kroger.com/i/accellion-incident).

On February 25, 2021, Western Union began receiving the data from Kroger necessary to determine what personal information handled by Kroger was affected and which customers were impacted due to the compromise of Kroger's file transfer service. Our investigation revealed that the information affected may have included the following: first name, last name, address, phone number, date of birth, driver's license number or other government-issued identification, and Social Security Number. Notification letters are scheduled to be mailed to five affected residents of North Dakota on March 17,

210605

2021. A sample copy of the individual notification letter is enclosed. Western Union is offering those individuals complimentary access to Experian IdentityWorks for a period of two years. The IdentityWorks service includes identity restoration, credit monitoring, identity theft insurance, and fraud detection tools.

We take this matter very seriously and are fully committed to protecting the privacy and security of our customers' information. As noted above, after learning of this incident, we immediately initiated an investigation. We have confirmed that Kroger stopped using the affected file transfer service provided by Accellion. Although our own systems were not impacted and this event has no material impact on Western Union, we will be reviewing Kroger's security practices and monitoring the circumstances surrounding this event.

Sincerely,

Craig Sharkey
Western Union Financial Services, Inc.

Enclosure

WesternUnion WU

Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

March 17, 2021

G3105-L03-0000006 T00001 P001 *****AUTO**MIXED AADC 159
SAMPLE A. SAMPLE - L03 BASE
APT ABC
123 ANY ST
ANYTOWN, ST 12345-6789

Notice of Data Breach

Dear Sample A. Sample:

I am writing to make you aware of an incident involving your personal information.

What Happened

On February 22, 2021, The Kroger Co. informed us that a file transfer service used by Kroger to transfer large data files associated with its money transfer operations, among other services, was compromised. The file transfer service was provided by Kroger's vendor, Accellion. The compromise resulted in an unauthorized party stealing significant volumes of data and records from a large number of Accellion customers, including Kroger. According to Kroger, it learned of this unauthorized access on January 23, 2021. Kroger informed us that the unauthorized access likely occurred between December 24, 2020 and December 29, 2020. Kroger has assured us that it no longer uses the impacted service.

Kroger had been using Accellion to transmit operational reports related to Western Union money transfers that were initiated or paid out in person at Kroger retail locations, as well as retail locations of additional Kroger-owned retail brands. These Kroger-owned brands include Kroger, Dillons, Ralphs, King Scoopers, City Market, Smith's, Fred Meyer, Fry's, QFC, Roundy's, Mariano's, and Harris Teeter.

Upon receiving the necessary data from Kroger, we immediately began investigating to determine what personal information handled by Kroger was affected and which of our valued customers were impacted due to the compromise of Kroger's service provider. Our investigation determined that some of the affected reports included information about you.

I want to emphasize that Western Union's information systems were not affected by this incident and we have no evidence that any money transfers were impacted.

What Information Was Involved

Our investigation revealed that the information affected may have included [Data Elements].

What We Are Doing

We take this matter very seriously and are fully committed to protecting the privacy and security of our customers' information. As noted above, after learning of this incident, we immediately initiated an investigation. We have confirmed that Kroger stopped using the affected file transfer service provided by Accellion. Although our own systems were not impacted, we will be reviewing Kroger's security practices and monitoring the circumstances surrounding this event.

To help protect your identity, we are offering complimentary access to Experian IdentityWorks℠ for a period of two years.

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed, then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that Identity Restoration is available to you for two years from the date of this letter and does not require any action on your part at this time. The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration.

While identity restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorks as a complimentary two-year membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information, please follow the steps below:

- Ensure that you **enroll by** June 30, 2021 (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: https://www.experianidworks.com/3bcredit
- Provide your **activation code**: **ABCDEFGHI**

If you have questions about the product, need assistance with Identity Restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (855) 873-7643 by June 30, 2021. Be prepared to provide engagement number DB26000 as proof of eligibility for the Identity Restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR TWO-YEAR EXPERIAN IDENTITYWORKS MEMBERSHIP

A credit card is not required for enrollment in Experian IdentityWorks. You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARE™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **$1 Million Identity Theft Insurance**:** Provides coverage for certain costs and unauthorized electronic fund transfers.

What You Can Do

Please review the enclosed *Information about Identity Theft Protection and Additional Resources* for additional information on how to protect against identity theft and fraud. This section describes additional steps you can take to help protect yourself, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file. You may also take advantage of the complimentary identity protection services being offered.

Information about Identity Theft Protection and Additional Resources

Monitor Your Accounts

We recommend that you remain vigilant by regularly reviewing statements from your accounts and periodically obtaining your credit report from one or more of the national credit reporting companies to monitor your credit for unauthorized activity, especially for activity that may indicate fraud, identity theft, or errors. You may obtain a free copy of your credit report once every 12 months from each of the three nationwide credit reporting agencies. You can order your annual free credit report online at www.annualcreditreport.com, by calling toll-free 1-877-322-8228, or by mailing an Annual Credit Report Request Form (available at www.annualcreditreport.com) to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281. You may also purchase additional copies of your credit report by contacting one or more of the three national credit reporting agencies listed below.

Equifax®	**Experian**	**TransUnion®**
P.O. Box 740241	P.O. Box 9701	P.O. Box 1000
Atlanta, GA 30374-0241	Allen, TX 75013-9701	Chester, PA 19016-1000
1-800-685-1111	1-888-397-3742	1-800-888-4213
www.equifax.com	www.experian.com	www.transunion.com

When you receive your credit reports, review them carefully. Look for accounts or creditor inquiries that you did not initiate or do not recognize. Look for information, such as home address and Social Security number that is not accurate. If you see anything you do not understand, call the credit reporting agency at the telephone number on the report.

You may be able to obtain one or more (depending on the state in which you reside) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s). Fees may be required to be paid to credit reporting agencies in certain circumstances.

Credit Freeze

You have the right to put a security freeze, also known as a credit freeze, on your credit file, free of charge, so that no new credit can be opened in your name without the use of a Personal Identification Number (PIN) 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 access your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. Pursuant to federal law, you cannot be charged to place or lift a credit freeze on your credit report. Should you wish to place a credit freeze, please contact all three major consumer reporting agencies listed below.

Equifax	**Experian**	**TransUnion**
P.O. Box 105788	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30348-5788	Allen, TX 75013-9554	Chester, PA 19016-2000
1-800-685-1111	1-888-397-3742	1-888-909-8872
www.equifax.com/personal/	www.experian.com/	www.transunion.com/
credit-report-services	freeze/center.html	credit-freeze

You must separately place a credit freeze on your credit file at each credit reporting agency. The following information should be included when requesting a credit freeze:

1) Full name, with middle initial and any suffixes;
2) Social Security number;
3) Date of birth (month, day, and year);
4) Current address and previous addresses for the past five (5) years;
5) Proof of current address, such as a current utility bill or telephone bill;
6) Other personal information as required by the applicable credit reporting agency;

If you request a credit freeze online or by phone, then the credit reporting agencies have one (1) business day after receiving your request to place a credit freeze on your credit file report. If you request a lift of the credit freeze online or by phone, then the credit reporting agency must lift the freeze within one (1) hour. If you request a credit freeze or lift of a credit freeze by mail, then the credit agency must place or lift the credit freeze no later than three (3) business days after getting your request.

Fraud Alerts

You also have the right to place an initial or extended fraud alert on your file at no cost. An initial fraud alert lasts 1-year and 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 7 years. Should you wish to place a fraud alert, please contact any one of the agencies listed below. The agency you contact will then contact the other two credit agencies.

Equifax	Experian	TransUnion
P.O. Box 105788	P.O. Box 9554	P.O. Box 2000
Atlanta, GA 30348-5788	Allen, TX 75013-9554	Chester, PA 19016-2000
1-888-766-0008	1-888-397-3742	1-800-680-7289
www.equifax.com/personal/ credit-report-services	www.experian.com/ fraud/center.html	www.transunion.com/fraud-victim-resource/place-fraud-alert

Additional Information

You can further educate yourself regarding identity theft and the steps you can take to protect yourself, by contacting your state Attorney General or the Federal Trade Commission. Instances of known or suspected identity theft should be reported to law enforcement, your Attorney General, and the FTC.

The Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
1-877-ID-THEFT (1-877-438-4338)
TTY: 1-866-653-4261
www.ftc.gov/idtheft

For Washington, D.C. residents: You may contact the Office of the Attorney General for the District of Columbia, 400 6th Street, NW, Washington, D.C. 20001, https://oag.dc.gov/, 202-727-3400.

For Maryland residents: You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, https://www.marylandattorneygeneral.gov/, 1-888-743-0023.

For North Carolina residents: You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov, 1-877-566-7226.

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/.

Reporting of identity theft and obtaining a police report.

For Iowa residents: You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

For Oregon residents: You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.

For More Information

If you have further questions or concerns, or would like an alternative to enrolling online, please call (855) 873-7643 toll-free Monday through Friday from 8 am – 10 pm Central, or Saturday and Sunday from 10 am – 7 pm Central (excluding major U.S. holidays). Be prepared to provide your engagement number DB26000.

Protecting your information is important to us. We trust that the services we are offering to you demonstrate our continued commitment to your security and satisfaction.

Sincerely,

Jean Claude Farah
President – Global Network
Western Union Financial Services, Inc.

7001 E. Belleview Avenue
Denver, CO 80237

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.