



July 27, 2023

BY EMAIL

**Office of the Attorney General
Hoover Building
1305 E. Walnut St.
Des Moines, IA 50319
consumer@ag.iowa.gov**

To Whom It May Concern:

On behalf of The Variable Annuity Life Insurance Company (“VALIC”), American General Life Insurance Company (“AGL”), The United States Life Insurance Company in the City of New York (“USL”), and VALIC Retirement Services Company (“VRSCO”), subsidiaries of Corebridge Financial, Inc. (collectively, “Corebridge”), and pursuant to Iowa Code Ann. § 715C.2(8), this letter provides notice of a third-party cybersecurity incident involving Iowa residents.

On June 5, 2023, Corebridge was made aware by its third-party service provider, Pension Benefit Information, LLC (“PBI”), that PBI was affected by the MOVEit zero-day security vulnerability. On June 16, 2023, Corebridge was notified by PBI that Corebridge customer data in their possession was obtained by an unauthorized third party. On June 26, 2023, following PBI’s investigation, PBI provided Corebridge with data files confirming that the event affected specific Corebridge customer records in PBI’s possession (the “PBI Incident”). PBI provides Corebridge with regulatory compliance and operational support services to determine whether certain account owners and policyholders are still living.

According to PBI, it discovered on June 2, 2023 that it had been a victim of the MOVEit zero-day vulnerability, and it completed the recommended patching and remediation steps on the same day. PBI notified law enforcement on June 3, 2023. PBI’s subsequent investigation has determined that a threat actor exploited the zero-day MOVEit vulnerability and accessed one of PBI’s servers between May 29 and May 30, 2023 and downloaded data. Corebridge understands that it is one of many of PBI’s business customers affected by this incident. In response to the PBI Incident, Corebridge has suspended all transmissions of data to PBI.

As of the time of writing, we have identified no indication of identity theft or fraud in relation to this event. Corebridge is still working with PBI to determine the exact scope of affected records. To date, our review has identified that personal information of approximately 39,870 Iowa residents was affected by the PBI Incident. PBI has also informed Corebridge that the acquired information included the personal information of

(1) Corebridge policyholders and account owners such as name, address, date of birth, and social security number, and (2) beneficiaries such as name, address, and date of birth.

On behalf of Corebridge, PBI is now notifying the individuals whose personally identifiable information was compromised by the unauthorized third party. Corebridge and PBI anticipate that they will begin providing notices by the end of July via U.S. mail.

A sample notification letter is enclosed. As stated in the attached sample notice, PBI, on Corebridge's behalf, is offering 24 months of complimentary credit monitoring, fraud consultation, and identity restoration services through Kroll.

Corebridge takes this matter very seriously and is committed to answering any questions you may have. If you have any questions regarding this submission, please do not hesitate to contact me at melissa.cozart@corebridgefinancial.com or 713-831-6371.

This correspondence, and any attachments, contains confidential, proprietary commercial or financial information, documentation, business plans, strategies, and other information that are not otherwise available to the public, and that, if disclosed, could cause substantial injury to the competitive position of Corebridge Financial and its affiliates. Accordingly, Corebridge Financial respectfully requests that this filing and its exhibits be afforded confidential treatment and be excepted from disclosure.

Respectfully yours,

Melissa H. Cozart

Vice President & Chief Privacy Officer

Corebridge Financial

2919 Allen Parkway, 3rd Floor, Houston, TX 77019

T (+1) 713.831.6371

melissa.cozart@corebridgefinancial.com | www.corebridgefinancial.com

Sample Individual Notification Letter



<< PO Box 9655
Amarillo, TX 79105-9655 >>

<<Name 1>> <<Name 2>>
<<Address 1>>
<<Address 2>>
<<Date>>
<<City>>, <<State>> <<Zip>>
<<Country>>

<<Notice of Data Breach>>

Dear <<Name 1>>:

We at Pension Benefit Information, LLC (“PBI”) are contacting you to provide important information about a recent data event. You are receiving this letter because PBI provides audit and address research services for insurance companies, pension funds, and other organizations, including Corebridge Financial, Inc.¹ (“Corebridge”). This letter is informing you of a global third-party software event that impacted PBI and may affect the security of your personal information. Although we have no indication of identity theft or fraud in relation to this event, we are providing you with information about the event, our response, and additional measures you can take to help protect your personal information. Please note that this incident is not the result of any breach at Corebridge. Corebridge’s information systems and operations were not impacted by this event, and Corebridge has successfully patched their respective instances of MOVEit in accordance with the latest best practices.

What Happened? On or around May 31, 2023, Progress Software, the provider of MOVEit Transfer software disclosed a vulnerability in their software that could be exploited by an unauthorized third party. PBI utilizes MOVEit in the regular course of our business operations to securely transfer files. PBI promptly launched an investigation into the nature and scope of the MOVEit vulnerability’s impact on our systems. Through the investigation, we learned that an unauthorized third party accessed one of our MOVEit Transfer servers on May 29, 2023, and

¹ References to Corebridge Financial, Inc. include its subsidiaries, which include American General Life Insurance Company, The United States Life Insurance Company in the City of New York, and The Variable Annuity Life Insurance Company.

May 30, 2023 and downloaded data. We then conducted a manual review of our records to confirm the identities of individuals potentially affected by this event and their contact information to provide notifications. We recently completed this review and have concluded that your personal information was involved in the incident. PBI has also notified law enforcement about this event.

What Information Was Involved? Our investigation determined that your personal information was impacted by this event and may have included: name, Social Security number, policy/account number, date of birth, and/or address.

What We Are Doing. PBI takes this event and the security of information in our care seriously. Upon learning about this vulnerability, we promptly took steps to patch servers, investigate, assess the security of our systems, and notify potentially affected customers and individuals associated with those customers. In response to this event, we are also reviewing and enhancing our information security policies and procedures.

While we are unaware of any identity theft or fraud as a result of this event, as an additional precaution, PBI is offering you access to 24 months of complimentary credit monitoring and identity restoration services through Kroll. Details of this offer and instructions on how to activate these services are enclosed with this letter.

What You Can Do. We encourage you to remain vigilant against incidents of identity theft and fraud by reviewing your account statements, monitoring your free credit reports for suspicious activity and to detect errors, and reporting any unusual activity to your financial institution. Please also review the enclosed *Steps You Can Take to Help Protect Personal Information*, which contains information on what you can do to safeguard against possible misuse of your information. You can also enroll in the credit monitoring and identity restoration services that we are offering.

For More Information. If you have additional questions, you may call our toll-free assistance line at <<**Kroll Call Center Number**>> Monday through Friday from 9:00 am to 6: 30 pm Eastern time (excluding U.S. holidays). You may also write to PBI at 333 South Seventh Street, Suite 2400, Minneapolis, MN 55402.

Sincerely,

John Bikus
President
Pension Benefit Information, LLC

STEPS YOU CAN TAKE TO HELP PROTECT PERSONAL INFORMATION

Enroll in Kroll's Monitoring Services

To help relieve concerns and restore confidence following this event, we have secured the services of Kroll to provide identity monitoring at no cost to you for 24 months. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Fraud Consultation, and Identity Theft Restoration.²

Visit <<IDMonitoringURL>> to activate and take advantage of your identity monitoring services.

You have until <<Date>> to activate your identity monitoring services.

Membership Number: <<Member ID>>

For more information about Kroll and your Identity Monitoring services, you can visit info.krollmonitoring.com.

Additional Information

- Credit Monitoring. You will receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll fraud specialist, who will be able to help you determine if it is an indicator of identity theft.
- Fraud Consultation. You have unlimited access to consultation with a Kroll fraud specialist. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.
- Identity Theft Restoration. If you become a victim of identity theft, an experienced Kroll licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and can do most of the work for you. Your investigator will be able to dig deep to uncover the scope of the identity theft, and then work to resolve it.

Monitor Your Accounts

Under U.S. law, a consumer is entitled to one free credit report annually from each of the three major credit reporting bureaus, Equifax, Experian, and TransUnion. To order a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. Consumers may also directly contact the three major credit reporting bureaus listed below to request a free copy of their credit report.

² Kroll's activation website is only compatible with the current version or one version earlier of Chrome, Firefox, Safari and Edge. To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.

Consumers have the right to place an initial or extended “fraud alert” on a credit file at no cost. An initial fraud alert is a one-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 consumers are the victim of identity theft, they are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should consumers wish to place a fraud alert, please contact any of the three major credit reporting bureaus listed below.

As an alternative to a fraud alert, consumers have the right to place a “credit freeze” on a credit report, which will prohibit a credit bureau from releasing information in the credit report without the consumer’s express authorization. The credit freeze is designed to prevent credit, loans, and services from being approved in a consumer’s name without consent. However, consumers should be aware that using a credit freeze to take control over who gets access to the personal and financial information in their credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application they make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, consumers cannot be charged to place or lift a credit freeze on their credit report. To request a credit freeze, individuals may need to provide some or all of the following information:

1. Full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. Addresses for the prior two to 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, etc.); and
7. A copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft if they are a victim of identity theft.

Should consumers wish to place a credit freeze or fraud alert, please contact the three major credit reporting bureaus listed below:

Equifax	Experian	TransUnion
https://www.equifax.com/personal/credit-report-services/	https://www.experian.com/help/	https://www.transunion.com/credit-help
1-888-298-0045	1-888-397-3742	1-800-916-8800
Equifax Fraud Alert, P.O. Box 105069 Atlanta, GA 30348-5069	Experian Fraud Alert, P.O. Box 9554, Allen, TX 75013	TransUnion Fraud Alert, P.O. Box 2000, Chester, PA 19016
Equifax Credit Freeze, P.O. Box 105788 Atlanta, GA 30348-5788	Experian Credit Freeze, P.O. Box 9554, Allen, TX 75013	TransUnion Credit Freeze, P.O. Box 160, Woodlyn, PA 19094

Additional Information

Consumers may further educate themselves regarding identity theft, fraud alerts, credit freezes, and the steps they can take to protect your personal information by contacting the consumer reporting bureaus, the Federal Trade Commission, or their state attorney

general. The Federal Trade Commission may be reached at: 600 Pennsylvania Avenue NW, Washington, D.C. 20580; www.identitytheft.gov; 1-877-ID-THEFT (1-877-438-4338); and TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. Consumers can obtain further information on how to file such a complaint by way of the contact information listed above. Consumers have the right to file a police report if they ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, consumers will likely need to provide some proof that they have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and the relevant state attorney general. This notice has not been delayed by law enforcement.

For District of Columbia residents, the District of Columbia Attorney General may be contacted at: 400 6th Street, NW, Washington, D.C. 20001; 202-727-3400; and oag.dc.gov.

For Maryland residents, the Maryland Attorney General may be contacted at: 200 St. Paul Place, 16th Floor, Baltimore, MD 21202; 1-410-528-8662 or 1-888-743-0023; and <https://www.marylandattorneygeneral.gov/>.

For New Mexico residents, consumers have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in their credit file has been used against them, the right to know what is in their credit file, the right to ask for their credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting bureaus must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to consumers' files is limited; consumers must give consent for credit reports to be provided to employers; consumers may limit "prescreened" offers of credit and insurance based on information in their credit report; and consumers may seek damages from violators. Consumers 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 consumers to review their rights pursuant to the Fair Credit Reporting Act by visiting 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 New York Attorney General may be contacted at: Office of the Attorney General, The Capitol, Albany, NY 12224-0341; 1-800-771-7755; or <https://ag.ny.gov>.

For North Carolina residents, the North Carolina Attorney General may be contacted at: 9001 Mail Service Center, Raleigh, NC 27699-9001; 1-877-566-7226 or 1-919-716-6000; and www.ncdoj.gov.