



2007-171
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January 17, 2007

Office of Consumer Protection
235 South Berentania Street, 9th Floor
Honolulu, HI 96813

Re: Legal Notice of Information Security Breach Pursuant to Section 3(f) of Hawaii's Security Breach Notification Act of 2006

To Whom it May Concern:

As you are aware, Hawaii law requires notice to the Office of Consumer Protection in the event of an information security breach involving the personal information about Hawaii residents. In accordance with that requirement, we write to inform you of an information security breach that Towers Perrin, a vendor that provides consulting services to Prudential, first reported to Prudential on January 3, 2007.

On December 1, 2006, Towers Perrin learned that five laptops had been stolen from its offices in Manhattan. The laptops contained personal information about current and former Prudential employees, including their names and social security numbers, and certain other pension benefit calculation information. Towers Perrin has advised us that the laptops were not encrypted, but that the laptops and the email program were separately password protected. Towers Perrin has no information indicating the information has been misused. It reported the theft to the New York City Police Department (Mid-town South Precinct). The police report number is 2006-014-17855. Subsequently the District Attorney's Office for the County of New York requested that Towers Perrin delay notifying affected individuals until January 5, 2007.

We estimate that approximately 51 Hawaii residents were affected by this incident. We are in the process of notifying all affected customers of the possible information security breach via written letter to each affected individual. The letters were mailed yesterday and today, January 16 and 17, 2007. For your convenience, a copy of the notice is enclosed with this letter. As the notice indicates, Towers Perrin has committed to encrypt all laptops that contain Prudential information by the end of this month.

The notices describe (1) the general nature of the incident resulting in the potential information security breach, (2) the type of personal information that was the subject of the possible security breach, (3) the precautionary measures Towers Perrin is taking to protect personal information from further unauthorized access, (4) contact information for inquiries regarding the incident, (5) how to enroll in Equifax's credit monitoring service, which Towers Perrin is making

available to affected individuals free of charge for one year; and (6) advice that affected individuals consider placing an initial fraud alert on their credit files and that they review account statements and monitor free credit reports that are available to them.

If you have any questions or need further information regarding this incident, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "L. J. Sava", with a long horizontal flourish extending to the right.

Enclosure

Prudential Financial

TO: Certain current and former employees of Prudential

RE: Important notice about personal data

DATE: January 16, 2007

I am writing to let you know that on January 9 we learned that laptop computers containing information about you were stolen from Towers Perrin, a company that provides actuarial consulting services to Prudential. To perform this work, Towers Perrin had access to some personal information about you, including your name and Social Security number, which were on the stolen laptops. Further details concerning this incident are contained in the enclosed letter from Towers Perrin.

We are deeply troubled that this situation occurred and are acutely aware of the need to safeguard personal information. We routinely evaluate the information security programs of third party business partners that require personal information to provide services to our employees. In this case, the internal controls we understood to be in place at Towers Perrin did not operate as intended. We are carefully reviewing this incident and are working with Towers Perrin to evaluate and immediately implement additional data protection measures needed. For example, all laptop computers containing Prudential-related information will be encrypted by the end of January.

At this time, we have no knowledge that information about you has been used inappropriately. As a precaution, Towers Perrin has arranged, at no cost to you, for you to enroll in a credit watch service so that you can monitor the situation. Towers Perrin has provided information about this service in the enclosed letter. I encourage you to take advantage of this credit watch service.

Towers Perrin has established a hotline to handle any questions you may have. That number is (800) 788-2795. Once again, we sincerely regret any concern or inconvenience that this incident may cause.

Sincerely,



Sharon C. Taylor
Senior Vice President
Corporate Human Resources

January 16, 2007

Dear

On December 1, 2006, we learned that laptops containing information about you, including your name, Social Security number and some information used to calculate pension benefits, had been stolen from Towers Perrin's offices. We promptly reported the theft to law enforcement authorities, who subsequently requested that we delay notification to Prudential and you until January 2007 to avoid any possible impediment to their investigation.

We take seriously our commitment to safeguarding confidential information entrusted to us by our clients. As a result of this event, we are already encrypting Towers Perrin laptops containing any Prudential data. This is scheduled to be completed by the end of January. We deeply regret that this incident occurred and apologize for any concern or inconvenience this may cause.

Precautions You Can Take

Although we have no knowledge of any misuse of your information, we have arranged for you to enroll, at your option, in the Equifax Credit Watch™ Gold with 3-in-1 credit monitoring product at no cost to you for one year. The product will provide you with an early warning system for changes to your credit file and help you to understand the content of your credit file at the three credit reporting agencies. To enroll in this product, go to Equifax's website at www.myservices.equifax.com/tri and complete the enrollment process. During the "check out" process, provide the following promotional code: TWR-202356404 in the "Enter Promotion Code" box. (*Case sensitive, include the dash, no spaces before or after the code.*) After entering your code, press the "Apply Code" button and then the "Submit Order" button at the bottom of the page. This code eliminates the need to provide a credit card number for payment. Alternately, you may enroll in the U.S. Mail version of the product by completing and sending the enclosed form by mail or via fax to Equifax at the phone number or address shown on the form. Once you have enrolled, the Equifax Credit Watch™ Gold with 3-in-1 credit monitoring product will provide you with several valuable services including:

- Credit file monitoring of your Equifax, Experian, and TransUnion credit reports;
- Automatic notification of key changes to your credit files from any of the three agencies;

- Free 3-in-1 Credit Report and unlimited Equifax Credit Reports™; For those residing outside New York, \$20,000 in identity theft protection with \$0 deductible (subject to the terms, limitations and exclusions of the policy)†; and
- 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 to help you initiate an investigation of inaccurate information.

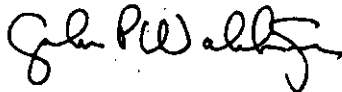
You may also want to consider placing an initial fraud alert on your credit file, which stays on your credit report for 90 days. You can do so by contacting one of the three credit reporting agencies listed below. A fraud alert tells creditors to contact you before they open any new accounts or change your existing accounts. As soon as one credit reporting company confirms your fraud alert, the others are notified to place a similar alert. When you place this alert on your credit report, you will receive information about ordering one free credit report from each of the credit bureaus.

- Equifax: 877-478-7625 www.equifax.com; P.O. Box 740241, Atlanta GA 30374-0241
- Experian: 888-397-3742 www.experian.com; P.O. Box 9532, Allen TX 75013
- TransUnion: 800-680-7289 www.transunion.com; Fraud Victim Assistance Division, P.O. Box 6790, Fullerton CA 92834-6790

Once you receive your reports, we urge you to review them carefully for inquiries from companies you did not contact, accounts you did not open, and debts on your accounts that you cannot explain. Verify the accuracy of your Social Security number, address(es), complete name and employer(s). Notify the credit bureaus if any information is incorrect. You should also be similarly vigilant in monitoring any consumer accounts you have for suspicious activity. Be sure to report suspected identity theft to the credit bureaus, to the company maintaining any compromised account and to the proper authorities. To learn more about how to protect yourself from identity theft, please visit www.consumer.gov/idtheft or call the Federal Trade Commission hotline phone number: 1-877-IDTHEFT (438-4338).

Again, we apologize for any inconvenience or concern this incident may cause. We are committed to assisting you in protecting yourself. If you have any questions or need additional information, please contact us at 800-788-2795.

Sincerely,



John P. Walsh, Jr. CISM
Towers Perrin – Chief Information Security Officer

† Identity FraudExpense Reimbursement Master Policy underwritten by Travelers Casualty and Surety Company of America and its property casualty affiliates, Hartford, CT 06183. Coverage for all claims or losses depends on actual policy provisions. Availability of coverage can depend on our underwriting qualifications and state regulations. Coverage not available for residents of New York.
Equifax's credit monitoring products are protected by U.S. Patent 7,208,052