

**Nancy Baran**  
Vice President  
Privacy Office

**The Prudential Insurance Company of America**  
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November 30, 2007

Ms. Martha Coakley, Esq.  
Attorney General  
Office of the Attorney General  
One Ashburton Place  
Boston, MA 02108

Mr. Daniel Crane  
Director  
Office of Consumer Affairs and Business Regulation  
Ten Park Plaza, Suite 5170  
Boston, MA 02116

Dear Ms. Coakley:

We are writing to inform you about a recent security incident. A former Prudential employee who had authorized access to personal information to perform his job duties was arrested and has been charged with stealing personal information and identity theft. Prudential has worked closely with law enforcement authorities in the investigation of this matter. While Prudential has strong safeguards in place to protect the security of personal information, we are reviewing our safeguards to determine whether any changes should be made. Prudential is notifying all potentially affected individuals, including 954 Massachusetts residents, and offering them credit monitoring for two years.

If you have any questions, please feel free to call me at (973) 802-8133.

Very truly yours,

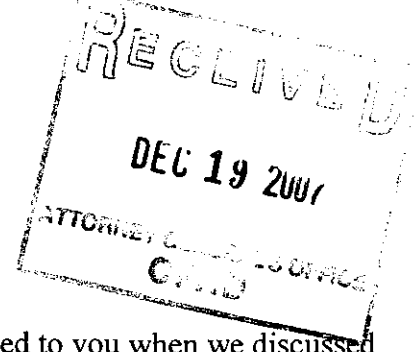


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December 18, 2007

Mr. Scott Schafer  
Consumer Protection Division  
Massachusetts Office of the Attorney General  
One Ashburton Place  
Boston, MA 02108



Dear Mr. Schafer:

This letter will provide you with a written copy of the information I supplied to you when we discussed the security breach regarding which Prudential notified the Attorney General's office by letter dated November 30, 2007.

The information that was the subject of the breach was the name, address, date of birth, social security number, and bank account information for certain Prudential customers and beneficiaries. The data was stored electronically, but the breach occurred when an individual wrote some of the information on paper, and printed copies of some of it.

The individual who took the data had authorized access to it in order to perform his job duties, and in fact handled such data routinely every day as part of his regular duties.

Prudential notified individuals of the breach using four letters, depending on the particular circumstances of the individual. A copy of the letter we sent most frequently is enclosed; the other three are substantially similar and can be provided if you would like them. Included as well with this letter is a copy of the enrollment instructions for the two years of free credit monitoring Prudential has offered to all individuals who were notified.

Prudential maintains strong safeguards to protect the security and confidentiality of personal information, including the information that was the subject of the security breach. In light of this matter, we will be commencing a review of our safeguards for that information in early January to determine if there is anything we should do differently.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

Enclosures:

- Letter to Massachusetts residents
- Enrollment instructions for credit monitoring



# Prudential

The Prudential Insurance Company of America  
PO Box 8769  
Philadelphia, PA 19176-8769

Name  
Address Line 1  
Address Line 2  
City, State Zip

Dear \_\_\_\_\_:

We are writing to inform you about a recent incident that might involve personal information about you. We were notified that a former Prudential employee is the subject of a criminal prosecution for stealing personal information and identity theft. Prudential is actively working with law enforcement authorities in their investigation of this crime. We deeply regret that this incident occurred.

We have reason to believe the former employee took personal information that includes an individual's name, address, date of birth, social security number, and bank account information. While this individual had access to Group Universal Life insurance certificate information, including information about you, to do his job, we have no indication that personal information about you was included in the information that was stolen or that it has been misused. However, we take our responsibility to safeguard personal information about you seriously, and we want to make you aware of the situation because we cannot rule out the possibility that information about you may have been compromised.

To enable you to protect personal information about you from unauthorized use or access, we are offering you 24 months of credit monitoring free of charge, provided by Equifax. Instructions for enrolling online or via a toll free telephone call are enclosed.

There are other steps you can take to further protect yourself against identity theft or other unauthorized use of personal information about you.

- We recommend that you remain vigilant and regularly review your credit card bills and your credit report for any unauthorized activity. Promptly report incidents of suspected identity theft or fraud to your local law enforcement agency, the Federal Trade Commission, your financial institution and to one of the three nationwide consumer reporting agencies listed below to have it removed from your credit file. You may wish to contact your credit card issuers and financial institution and inform them of the incident.
- You may contact the fraud departments of the three major credit reporting agencies to discuss your options. Under Massachusetts law, you have the right to place a security freeze on your credit file. You may request that a security freeze be placed on your consumer report by sending a request to a consumer reporting agency by certified mail, overnight mail or regular stamped mail to the address below. The following information should be included when

requesting a security freeze (documentation for both the spouse and the victim must be submitted when requesting the spouse's credit report): full name, with middle initial and any suffixes; social security number; date of birth (month, day and year); current address and previous addresses for the past two years; and applicable fee (if any) or incident report or complaint with a law enforcement agency or the Department of Motor Vehicles. The request also should include a copy of a government issued identification card, such as a driver's license, state or military ID card, and a copy of a utility bill, bank or insurance statement. Each copy should be legible, display your name and current mailing address, and the date of issue (statement dates must be recent). A security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent; however, using a security freeze may delay your ability to obtain credit. The consumer reporting agency may charge a reasonable fee of up to \$5.00 to place a freeze or lift or remove a freeze, unless you are a victim of identity theft or the spouse of a victim of identity theft, and have submitted a valid police report relating to the identity theft to the consumer reporting agency.

Experian  
(888) 397-3742  
P.O. Box 9532  
Allen, TX 75013  
[www.experian.com](http://www.experian.com)

Equifax  
877-478-7625  
P.O. Box 740241  
Atlanta, GA 30374-0241  
[www.equifax.com](http://www.equifax.com)

TransUnion  
(800) 680-7289  
P.O. Box 6790  
Fullerton, CA 92834-6790  
[www.transunion.com](http://www.transunion.com)

- The credit monitoring we are offering you will provide you with one copy of your 3-in-1 Credit Report and additional copies of your Equifax credit reports free of charge. There are other ways to obtain your credit reports without charge. Under federal law, you are entitled to one free copy of your credit report every 12 months from each of the three major credit reporting agencies. You may request your free annual credit report by visiting [www.annualcreditreport.com](http://www.annualcreditreport.com) or calling (877) FACTACT (1-877-322-8228). You may want to obtain copies of your credit report to ensure the accuracy of the report information.
- Identity theft is a growing concern. To learn more and to report incidents of identity theft, you can go to [www.consumer.gov/idtheft](http://www.consumer.gov/idtheft), or [www.ftc.gov/credit](http://www.ftc.gov/credit), or call 1-877-IDTHEFT (1-877-438-4338).

We regret the inconvenience or concern this incident may cause you and remain committed to protecting the privacy of personal information. If you have any questions about this situation, please do not hesitate to contact us by calling us at 1-800-357-1722 between the hours of 9am through 9pm ET, 7 days a week.

Very truly yours,



Robert Many  
Senior Vice President, Group Insurance

## Directions for Enrolling in Equifax Credit Watch™ Gold Offered by Prudential

### **Enroll in Equifax Credit Watch™ Gold with 3-in-1 Monitoring**

Equifax Credit Watch will provide you with an “early warning system” to changes to your credit file and help you to understand the content of your credit file at the three major credit reporting agencies. The key features and benefits are listed below.

Equifax Credit Watch provides you with a 2-year membership:

- Comprehensive credit file monitoring of your Equifax, Experian, and TransUnion credit reports with daily notification of key changes to your credit files from any of the three agencies.
- Wireless alerts and customizable alerts available
- One 3-in-1 Credit Report and unlimited access to your Equifax Credit Report™
- \$20,000 in identity theft insurance with \$0 deductible, at no additional cost to you †

† Identity Fraud Expense 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. This product is not intended for minors (under 18 years of age). Coverage not available for residents of New York. Equifax's credit monitoring products are protected by US Patent 7,028,052

- 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 in initiating an investigation of inaccurate information.

### **How to Enroll**

Equifax has a simple Internet-based verification and enrollment process that you can use, or you may enroll by calling the toll-free telephone number below. In either case, you will need to use the code below, which will be valid for your use through March 7, 2008.

**To enroll online, visit:** [www.myservices.equifax.com/tri](http://www.myservices.equifax.com/tri)

1. **Consumer Information:** complete the web form with your contact information (name, address and e-mail address) and click “Continue” button. The information is provided in a secured environment.
2. **Identity Verification:** complete the web form with your Social Security Number, date of birth, telephone #s, create a User Name and Password, agree to the Terms of Use and click “Continue” button. The system will ask you up to two security questions to verify your identity.
3. **Payment Information:** During the “check out” process, provide the following promotional code: **XXXXX-YYYYYYYYYY** in the “Enter Promotion Code” box. (no spaces, include dash.) 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.)
4. **Order Confirmation:** – Click “View My Product” to access your 3-in-1 Credit Report.

**To enroll by telephone** and sign up for US Mail delivery of the Equifax product, dial 1-866-937-8432 for access to the Equifax Credit Watch automated enrollment process. Note that all credit reports and alerts will be sent to you via US Mail only.

1. Promotion Code: You will be asked to enter your promotion code as shown above (no spaces, no dash)
2. Customer Information: You will be asked to enter your home telephone number, home address, name, date of birth and Social Security Number.
3. Permissible Purpose: You will be asked to provide Equifax with your permission to access your credit file and to monitor your file. Without your agreement, Equifax can not process your enrollment.
4. Order Confirmation: Equifax will provide a confirmation number with an explanation that you will receive your Fulfillment Kit via the US Mail (when Equifax is able to verify your identity) or a Customer Care letter with further instructions (if your identity can not be verified using the information provided).