

MERCER



MARSH MERCER KROLL
GUY CARPENTER OLIVER WYMAN

Jonathan Barry, F.S.A., E.A.
Partner

99 High Street
Boston, MA 02110
+ 1 617 747 9676 Fax +1 617 747 9501
jonathan.barry@mercer.com
www.mercer.com

Office of the Maine Attorney General
6 State House Station
Augusta, Maine 04333

May 13, 2010

CONSUMER PROTECTION DIVISION
RECEIVED
MAY 17 2010

OFFICE OF ATTORNEY GENERAL

To Whom It May Concern:

We are writing to advise you of an incident involving a mailing of an Annual Funding Notice containing certain personal information belonging to participants of the Eastern Connecticut Health Network, Inc. Pension Plan. As described below, Eastern Connecticut Health Network, Inc. (ECHN) first learned of this breach on April 29 and took immediate action to ensure that law enforcement was informed, determine what information may have been compromised and warn and offer solutions to the affected individuals.

Learning About the Breach. Mercer prepared and provided the Annual Funding Notice for the ECHN Pension Plan, which was mailed to participants on April 26, 2010. To print and mail the notices, Mercer sub-contracted a third party vendor and provided this vendor with a file that contained addresses and Social Security Numbers for plan participants. Unfortunately, the Social Security Numbers were inadvertently printed on the mailing label. Several participants contacted ECHN on and after April 29, 2010, informing ECHN that this personal information was contained on the mailing label.

Investigating the Disclosure. That same day (April 29), ECHN contacted Mercer to inform Mercer of the issue and Mercer began to take steps to address the issue. Within one day, we were able to determine the universe of individuals who were potentially affected. The total number of affected individuals was 3,178. Fortunately, neither ECHN nor Mercer has any knowledge or reason to believe that any information contained in the mailing has been accessed, misused or compromised in any way.

Communicating with Affected Individuals. Mercer takes privacy and information security seriously. In order to ensure that potentially affected individuals are able take immediate steps to protect themselves from possible identity theft or other damage, Mercer, on behalf of itself and ECHN, will be alerting these individuals about the situation in the next few days.

Services to Affected Individuals. Kroll Inc. has been retained to provide toll-free access to Kroll's Consumer Solutions Center, along with credit monitoring services and identity restoration services at no cost to the potentially affected individuals. We will alert individuals to remain vigilant by reviewing account statements and monitoring free credit reports.

MERCER



MARSH MERCER KROLL
GUY CARPENTER OLIVER WYMAN

Page 2
May 13, 2010
Office of the Maine Attorney General

Kroll will provide access to a credit report to affected individuals who enroll for the service. In addition, the enrolled individual's credit file will be monitored for critical changes, including address changes, inquiries, new trade-lines, derogatory notices and appearance of certain public records. Individuals will be informed of such changes by either post or electronic mail. If the person suspects or discovers fraudulent activity, Kroll, among other things, will provide affected individuals with a toolkit of resources to address issues they encounter and, if permitted, will work on their behalf to restore their credit or identity. We also believe the services we are offering to these participants will help them immediately respond to any threats of identity theft or other misuse of their data as a result of this isolated theft.

We hope that this letter and its enclosures provide you with all the information you need. Please let us know if you have further questions or if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Barry'.

Jonathan Barry, F.S.A., E.A.
Partner

Copy: Natalie Cook – ECHN



URGENT — Please Open Immediately.

<<FirstName>> <<MiddleName>> <<LastName>>
<<Address1>>
<<Address2>>(Place fields Address 3-5 below, if used)
<<City>>, <<State>> <<Zip>>
<<CountryId>>
<<POSTNET BARCODE>>

To: ECHN Pension Plan Participants

From: Deb Gogliettino, M.S. SPHR
Senior Vice President, Human Resources

Date: <<Date>>(Format: Month Day, Year)

Re: Recent correspondence from ECHN about your pension.

We are writing to inform you of a data security incident, involving our consulting group that occurred in April 2010. ECHN uses Mercer, a consulting group, which has served as the pension plan advisor to ECHN since 2002.

Mercer understands the seriousness of this incident and has written a letter of apology to you, which is enclosed with this memorandum. This letter also describes comprehensive identity theft safeguards, provided by Kroll Inc., which Mercer is also offering at no cost to you.

Such an error has never occurred in our relationship with Mercer.

Kroll is the world's leading risk consulting company and was founded in 1972, with an international reputation for specializing in security services with offices providing full service investigative, intelligence and security services in more than 25 countries.

Please take the time to read the letter from Mercer and follow the instructions provided for you to take advantage of the identity theft safeguards. Mercer has provided an 800 number to assist you with any questions or concerns.

If you have any general questions, you are welcome to contact the Human Resource Connection at 860-872-5180.

Thank you for your attention to this matter.

MERCER



<<FirstName>> <<MiddleName>> <<LastName>>
Membership Number: <<MembershipNumber>>
Member Services: 1-800-588-9839
9:00 a.m. to 6:00 p.m. (Eastern Time), Monday through Friday
If you have questions or feel you may have an identity theft issue,
please call ID TheftSmart member services.

<<Date>>(Format: Month Day, Year)

Dear <<FirstName>> <<MiddleName>> <<LastName>>,

As you are aware, Mercer discovered a data security incident that may have exposed some of your personal information. This letter also describes the services we are offering you, to help relieve concerns and restore confidence following this incident.

<<ClientDef1(Breach Details Variable Text)>><<ClientDef2(Breach Details Variable Text)>>(ClientDef1 and ClientDef2 fields combined into a single paragraph—Fields should flow from one to the other with no extra spaces or breaks between them. Text below should reflow depending on length.)

We assure you that we are committed to safeguarding your sensitive personal information, and have taken immediate steps to fortify the protective measures that were already in place.

Because securing your personal information is so important to us, we have engaged Kroll Inc., the world's leading risk consulting company, to provide its ID TheftSmart™ service. Kroll's Fraud Solutions team has **more experience than any other organization** when it comes to helping people who have experienced the unintentional exposure of confidential data. We are providing you FREE access to:

- **Enhanced Identity Theft Consultation and Restoration.** Licensed Investigators who truly understand the problems surrounding identity theft, are available to listen, to answer your questions, and to offer their expertise regarding any concerns you may have. And should your name and credit be affected by this incident, your investigator will help restore your identity to pre-theft status. The investigators do most of the work!
- **Current Credit Report.** Kroll offers you access to an up-to-date credit report from Experian. If you suspect fraudulent activity, please call the Kroll team.
- **Continuous Credit Monitoring.** Monitoring alerts make you aware of key changes, using data from all three major national credit repositories, in your credit file that could indicate the kind of unauthorized activity commonly associated with identity theft and fraud. Your authorization is required.

Please see the enclosed brochure for easy, simple instructions to take advantage of these Kroll Services. To receive online credit services, please visit www.idintegrity.com to complete your authorization. If you would prefer to order and receive your credit services through the mail, please fill out and return the enclosed *Consumer Credit Report and Credit Monitoring Authorization Form*. Note, however, that if you fill out and return the authorization form to receive credit services through the mail, you cannot sign up online.

Please note that to be eligible for the credit monitoring service, you need to be over the age of 18 with credit established in the U.S., have a Social Security number issued in your name, and have a U.S. residential address associated with your credit file.

If you meet the above criteria, please read the following instructions to start your credit services.

1. Go to www.idintegrity.com, where you need to:

- Provide the membership number included with this letter;
- Insert your last name; and
- Authenticate your online registration with the zip code from the address to which this letter was sent.
- If the letter was sent to a non-U.S. address, use "00000" for a zip code.

2. Once you click "continue" to sign up, please update your demographic information to your permanent residential U.S. address.

You may call 1-800-588-9839, 9:00 a.m. to 6:00 p.m. (Eastern Time), Monday through Friday, if you have any questions or feel you may have an identity theft issue.

We deeply regret that this happened. We trust that the quality and reliability of the support services being offered demonstrate our continued commitment to your security and satisfaction.

Sincerely,

Jonathan Barry, FSA, EA
Partner

U.S. State Notification Requirements

For residents of Hawaii, Iowa, Maryland, Michigan, Missouri, North Carolina, Oregon, Vermont, Virginia, West Virginia, and Wyoming:

It is required by state laws to inform you that you may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity. You may obtain a free copy of your credit report by contacting any one or more of the following national consumer reporting agencies:

Equifax

P.O. Box 740241
Atlanta, Georgia 30374
1-800-685-1111
www.equifax.com

Experian

P.O. Box 2002
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion

P.O. Box 2000
Chester, PA 19022
1-800-888-4213
www.transunion.com

For residents of Iowa:

State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of Oregon:

State laws advise you to report any suspected identity theft to law enforcement, as well as the Federal Trade Commission.

For residents of Maryland and North Carolina:

You can obtain information from the Maryland and North Carolina Offices of the Attorneys General and the Federal Trade Commission about steps you can take to avoid identity theft.

Maryland Office of the Attorney General

Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
www.oag.state.md.us

North Carolina Office of the Attorney General

Consumer Protection Division
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-566-7226
www.ncdoj.com

Federal Trade Commission

Consumer Response Center
600 Pennsylvania Avenue, NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)
www.ftc.gov/bcp/edu/microsites/idtheft/

For residents of Massachusetts and West Virginia:

It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft. You also have the right to place a security freeze on your credit report. A security freeze is intended 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.

To place a security freeze on your credit report, you need to send a request to a consumer reporting agency by certified mail, overnight mail, or regular stamped mail. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. The consumer reporting agency may charge a 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 you have submitted a valid police report relating to the identity theft incident to the consumer reporting agency.

Equifax Security Freeze

P.O. Box 105788
Atlanta, Georgia 30348
www.equifax.com

Experian Security Freeze

P.O. Box 9554
Allen, TX 75013
www.experian.com

TransUnion (FVAD)

P.O. Box 6790
Fullerton, CA 92834-6790
www.transunion.com