

The Northern Trust Company
50 South LaSalle Street
Chicago, Illinois 60603



Northern Trust

July [], 2014

[First Name][Last Name]

[Street Address]

[City], [State] [Zip Code]

Subject: Important Security and Protection Notification Regarding Your Employee Benefits Plan.
After reading this entire letter, if you have any questions, please contact the Experian customer care team at (866) 579-5479

Dear [Name]:

The Northern Trust Company provides or previously provided payment services for an employee benefits plan or program in which you participate or participated through [Company Name]. In that capacity, Northern Trust is responsible for maintaining certain personal information about you as a participant of that plan. Regrettably, we are writing to inform you about an inadvertent disclosure by Northern Trust of some of that information. Although we believe that **there is minimal risk of misuse of your personal information due to this inadvertent disclosure now or in the future as described in further detail below**, we are making sure you are fully informed.

As part of normal procedures, Northern Trust sends participant information to record-keeping companies that assist in administering those benefit plans and programs. In late May, a Northern Trust employee transmitted a file containing your information to one of our record-keeping companies that was not responsible for the plan in which you participate(d). The information included your name, address, Social Security number, and benefits plan or program account number, as well as other information about your benefits plan or program account, such as your payment/deduction amounts and, in some situations, bank routing and account numbers used for direct deposits. In compliance with our policy, that file was transmitted in an encrypted format in order to prevent unauthorized disclosure. The recipient record-keeping company was authorized to receive this type of data for participants in programs and plans that it administers for other companies, but not for the particular plan in which you are a participant. The one employee of the record-keeping company who viewed the information is trained in handling and protecting personal information, and works with this same type of personal information for other participants.

Following a comprehensive investigation, we have determined that appropriate steps were taken to protect the information from misuse. As noted above, only one employee of the record-keeping company viewed the file. Upon realizing that the encrypted file from Northern Trust contained personal information that was transmitted in error, the employee promptly notified Northern Trust and followed protocol by permanently deleting the file. And, as confirmed in a sworn statement, the information was never forwarded to any other third party and was not retained on the information system of that record-keeper. **We have no indication whatsoever that any of your personal information is at risk of misuse.**

Nonetheless, as a courtesy, Northern Trust is offering you one year of free credit monitoring through Experian's ProtectMyID Alert product. This product monitors your credit accounts for fraud. Enclosed you will find information on how to begin credit monitoring, including your personal activation code. You will not need to provide a credit card or sign up for any other service provided by Experian in order to access this product.

There are also a number of steps you can take to protect yourself, such as placing a freeze on your credit report or contacting the appropriate authorities if you believe you have been the victim of identity theft. The enclosed "Identity Theft Protection Tips" describes some of these steps. Of course, it is always important that you remain vigilant by reviewing your financial account statements and credit reports for signs of fraud.

We deeply regret this incident and are committed to ensuring that your personal information remains protected. If you have any questions, please call the Experian customer care team seven days a week from 9:00am – 9:00pm EST Monday - Friday, and Saturday - Sunday from 11:00am – 8:00pm EST toll free at (866) 579-5479 or international number (479) 573-7373.

Sincerely,

Stacey C. Bolton
Senior Vice President, Global Compliance

Attachments: Identity Theft Protection Tips
Experian ProtectMyID activation information

IDENTITY THEFT PROTECTION TIPS

While we believe the risk of identity theft or further disclosure of your personal information is very small, you should consider taking the following steps to protect yourself and your identity:

- **Enroll in the Experian ProtectMyID credit monitoring product.** As explained above, Northern Trust is providing you pre-paid, one-year membership for credit monitoring from Experian. See the enclosed information regarding how to activate your membership. Please note that the activation code provided is specific to you and should not be shared with anyone. Please note also that only you can activate your membership. Northern Trust or your employer cannot activate in this product on your behalf.
- **Place a security freeze or fraud alert on credit files.** State laws permit you to place a security freeze on your credit files. The purpose of a freeze is to prevent credit cards, loans, or other forms of credit from being opened in your name without your permission by restricting access to your credit report. Depending on the applicable state laws, there may be a small charge for placing a freeze on your credit file.

You may also elect to place a fraud alert on your credit files. A fraud alert notifies lenders that you may be the victim of identity theft and requires them to take certain verification procedures before opening new accounts in your name.

For more information about placing a security freeze or fraud alert on your credit file, contact the following credit reporting agencies:

Equifax

PO Box 740256
Atlanta, GA 30374
www.equifax.com
800-525-6285

Experian

PO Box 9554
Allen, TX 75013
www.experian.com
888-397-3742

TransUnion

PO Box 6790
Fullerton, CA 92834
www.transunion.com
800-680-7289

- **Monitor your credit files, bank account statements, credit card statements, etc. closely for indications of identity theft or other misuse.**

If you believe you are the victim of identity theft, you should contact your local law enforcement and file a police report. You should also consider contacting the U.S. Federal Trade Commission's identity theft hotline at (877) 438-4338, or visit <https://www.consumer.ftc.gov/articles/0277-create-identity-theft-report> to file a report and to obtain more information about combating identity theft. You may also wish to contact your state Attorney General. Maryland residents can contact their AG at: (410) 576-6566; North Carolina residents can contact their AG at: (919) 716-6000; contact information for the other Attorneys General is available at: <http://www.naag.org/current-attorneys-general.php>.

How to Activate Pre-Paid 12-Month ProtectMyID Membership with Experian

1. ENSURE **That You Enroll By: October 31, 2014** (Your code will not work after this date.)
2. VISIT the **ProtectMyID Web Site to enroll: www.protectmyid.com/alert**
3. PROVIDE **Your Activation Code: [TO BE INSERTED]**

If you have questions or need an alternative to enrolling online, please call Experian customer care team at (866) 579-5479 and provide engagement # **XXXXXX**. **A credit card is not required for activation.**

Once your enrollment in ProtectMyID is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team toll free at (866) 579-5479 or international number (479) 573-7373.